

**BEFORE HEARING COMMISSIONERS
FOR THE PALMERSTON NORTH CITY COUNCIL**

**I MUA NGĀ KAIKŌMIHANA WHAKAWĀ
MO TE KAUNIHERA O PAPAIOEA**

IN THE MATTER of the Resource Management Act 1991

AND

IN THE MATTER of proposed Plan Change I: Increasing Housing
Supply and Choice to the Palmerston North District
Plan

**SECTION 42A TECHNICAL REPORT OF SARAH JENKIN
ON BEHALF OF PALMERSTON NORTH CITY COUNCIL**

PLANNING

Dated 25 July 2025

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A. EXECUTIVE SUMMARY

1. This report considers submissions received by Palmerston North City Council (the Council) in relation to the relevant provisions of Plan Change I (notified on 20 November 2024) to the Operative District Plan for Palmerston North (PC:I).
2. A total of 814 submission points and 69 further submission points were made on PC:I. The matters raised by submissions were wide-ranging. The following key issues were raised and are covered in this report:
 - Issue 1: The principle of residential intensification in Palmerston North.
 - Issue 2: Effects of residential intensification.
 - Issue 3: Whether the zone boundary is in the right place.
 - Issue 4: Whether 17 Summerhays Street and the Huia Street Reserve should be rezoned to MRZ.
 - Issue 5: Whether the objectives set an appropriate outcomes framework for residential intensification.
 - Issue 6: Whether the policies set an appropriate framework for how residential intensification will be achieved.
 - Issue 7: Whether the rules are appropriately drafted to manage effects of residential intensification.
 - Issue 8: Whether the notification provisions in the relevant rules are set appropriately.
 - Issue 9: Whether the standards applying to residential intensification are appropriate.
3. The Council received several other categories of submissions: those I consider beyond the scope of PC:I, as they are not 'on the plan change', submissions addressing 'general' matters, submissions on consequential amendments to the ODP, submissions on definitions and submissions that apply to PC:I as a whole.

4. I recommend various amendments to PC:I in response to submissions. My analysis of the submissions on each topic or issue forms part of the s 32AA evaluation, in accordance with s 32AA(1)(d)(ii) of the RMA.
5. I consider PC:I meets the necessary statutory tests in the RMA:
 - (a) PC:I gives effect to the NPS-UD and NPS-FM;
 - (b) PC:I gives effect to the Horizons Regional Council Regional Policy Statement.
6. The housing supply enabled by PC:I will make a meaningful contribution towards the demand for infill housing in Palmerston North.
7. As part of preparing this s 42A report I attended pre-hearing meetings, on a without prejudice basis, with a number of submitters. These meetings were helpful in helping me understand the relief sought by the relevant submitters and they resulted, in my opinion, in a meaningful narrowing of some issues.
8. Arohanui Hospice Ltd (submitter number SO204) withdrew their submission prior to completion of this s 42A report. I do not, therefore, consider the relief sought by this submitter.
9. I have provided as **Appendix 1**, a table setting out the relevant submission points. In that table I have identified whether I accept, accept in part or reject the submission point sought by the submitters. I explain my reasons in this report.
10. I have provided as **Appendices 2 - 5**, the recommended amendments to PC:I in response to submissions:
 - (a) **Appendix 2** – Redline version of Chapter 10A – Medium Density Residential Zone
 - (b) **Appendix 3** – Redline version of Chapter 7B – Subdivision in the Medium Density Residential Zone
 - (c) **Appendix 4** – Redline version of Chapter 4A – Definitions
 - (d) **Appendix 5** – Recommended changes to Consequential Amendments

11. For the reasons set out in the s 32AA evaluation included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate way to:
- (a) Give effect to the requirements of relevant higher order documents, in particular the NPS-UD, and overall give effect to the sustainable management purpose of the RMA where it is necessary to revert to Part 2, in respect to the proposed objectives; and
 - (b) Achieve the relevant objectives of PC:I.
12. I therefore recommend that the Hearing Panel accept, accept in part, or reject submissions (and associated further submissions) as outlined in this report and that PC:I is amended in accordance with the changes I recommend in response to submissions.

B. INTRODUCTION

13. My name is Sarah Lea Jenkin. I am a self-employed planning consultant trading as Navigatrix. Prior to mid-July 2023 I was a Technical Director – Planning at GHD Limited based in Wellington, where I had been employed for nine years.
14. I hold a Bachelor of Resource and Environmental Planning (Honours) from Massey University, and I am a full member of the New Zealand Planning Institute (NZPI). I was a member of the NZPI Board between 2015 and 2021, and I am an accredited hearing commissioner.
15. I have nearly 30 years' experience as a practising planner across consultancy, local and central government, in New Zealand and in the UK. During this time, I have reviewed and developed district, regional and national policy, critiqued policy written by others, authored s 32 and s 42A reports, prepared submissions to planning policy, and prepared and presented expert evidence on behalf of councils and submitters.
16. Most recently I appeared as a Section 42A author for Greater Wellington Regional Council at its RPS Change 1 hearings, and I mentored Section 42A authors for RPS Change 1 and the 2023 Wellington City Council District Plan Review (including peer review of their reports and rebuttal evidence). In 2024 I

gave evidence on behalf of Port Nelson Limited to Nelson City Council's housing intensification Plan Change 29.

17. I have been engaged by the Council to prepare Plan Change I: Increasing Housing Supply and Choice (PC:I), respond to submissions and further submissions, and to prepare and present this s 42A report. I led drafting of the notified version of PC:I and I authored the s 32 report and the Accessibility and Demand Assessment. I co-authored the Development Capacity Assessment with Stacey Andrews – the Council's City Economist. As part of preparing the notified plan change, I met (alongside Mr Mori, a Principal Planner from the City Planning Team) with a number of key stakeholders and with Rangitāne o Manawatū (Rangitāne) to understand issues and inform plan change development.
18. I began my involvement with PC:I in May 2024. While I was not involved in earlier preparation of the plan change that went out for public consultation in 2022 (including setting the overall approach to determining the MRZ boundary or the methodology for determining theoretical and feasible development capacity), I have reviewed this previous work as part of preparation of the notified plan change and s 32 report.

C. CODE OF CONDUCT

19. I confirm that I have read and agree to comply with the Code of Conduct for Expert Witnesses in the Environment Court Practice Note 2023. I confirm that I have stated the reasons for my opinions in this report and have considered all the material facts that might alter or detract from those opinions.
20. Statements expressed in this report are within the scope of my expertise, except where I rely on the technical advice I have referred to in paragraph 15 of this report.
21. I have all the information necessary to assess the application within the scope of my expertise and am unaware of any gaps in the information or my knowledge.

D. SCOPE

22. This s 42A report addresses all submissions to PC:I. In relation to submissions concerning subdivision matters, I had the assistance of Mr Simon Mori.

23. I have provided as **Appendix 1**, a table setting out the relevant submission points. In that table I have identified whether I accept, accept in part or reject the submission point sought by the submitters. I explain my reasons in this report.
24. I have provided as **Appendices 2 - 5**, the recommended amendments to PC:I in response to submissions:
- (a) Appendix 2 – Redline version of Chapter 10A – Medium Density Residential Zone
 - (b) Appendix 3 – Redline version of Chapter 7B – Subdivision in the Medium Density Residential Zone
 - (c) Appendix 4 – Redline version of Chapter 4A – Definitions
 - (d) Appendix 5 – Recommended changes to Consequential Amendments
25. In preparing this report, I have reviewed:
- (a) All submissions to PC:I
 - (b) The Resource Management Act 1991
 - (c) National Policy Statement for Freshwater Management 2020 (updated January 2024) (NPS-FM)
 - (d) National Policy Statement for Urban Development 2020 (updated May 2022) (NPS-UD)
 - (e) National Planning Standards 2019 (NPS)
 - (f) Operative Horizons One Plan, incorporating Plan Change 3: Urban Development
 - (g) Statements of evidence from
 - (i) Mr Jonathan Ferguson-Pye – Strategic Overview
 - (ii) Mr Andrew Burns – Urban Design
 - (iii) Ms Harriet Fraser – Traffic and Transportation

- (iv) Mr David Charnley – Landscape
- (v) Ms Mary Wood - Stormwater
- (vi) Mr David Watson – Climate Change
- (vii) Ms Stacey Andrews – Economics
- (viii) Mr Sean Syman – Noise
- (ix) Mr Aaron Phillips – Parks

E. PRE-HEARING MEETINGS

26. As part of preparing this s42A report I attended pre-hearing meetings with a number of submitters, the purpose being to attempt to narrow the issues. The following paragraphs describe the outcomes of those meetings.
- (a) **SO78 – The Fuel Companies** - confirmation that the recommended amendments to MRZ-O5, MRZ-P11, MRZ-S3 and a new definition of reverse sensitivity are likely to sufficiently address the relief sought by the Fuel Companies.
 - (b) **SO107 – Powerco Limited** – confirmation that the concerns raised by Powerco in their submission are anticipated to largely be addressed by the relevant s 42A report recommendations. Powerco will confirm whether they still wish to appear at the hearing following release of the s 42A report.
 - (c) **SO166 – PNCC** - confirmation that the Council is not pursuing submission points SO166.32 and SO166.36.
 - (d) **SO194 - Horizons Regional Council** – understanding that there is agreement to the Council's approach reconciling the modelling approach in the Housing and Business Needs Assessment (HBA) and PC:I.
 - (e) **SO195 – Age-Friendly Palmerston North** – understanding that not all of Age-Friendly Palmerston North's relief can be achieved through PC:I, and that some of the notified provisions, and those recommended for

amendment in response to other submissions, will contribute to achieving some of the relief sought.

- (f) **SO196 – Ministry of Education** – I discussed the relief sought with MoE. As of 25 July 2025, there has been no agreed resolution.
- (g) **SO199 – Kāinga Ora** – I discussed the relief sought with Kāinga Ora. As of 25 July 2025, there has been no agreed resolution.
- (h) **SO201 - Natural Hazards Commission**
 - (i) Agreement that a liquefaction overlay and related rules are no longer sought; and
 - (ii) Understanding that the relevant objectives, policies, rules and standards in PC:I represent 'appropriate mitigation' as sought by Objective MRZ-O5.
- (i) **SO202 – New Zealand Defence Force** – I discussed the relief sought with NZDF. As of 25 July 2025, there has been no agreed resolution.
- (j) **SO204 - Arohanui Hospice Limited** – submission subsequently withdrawn.

F. ERRATA

- 27. At paragraph 1.3 of the s 32 report the spatial extent of PC:I was reported as being 815m² in area rather than the correct figure of 815ha.

G. STATUTORY CONSIDERATIONS

Resource Management Act 1991

- 28. PC:I has been prepared in accordance with the RMA and in particular the requirements of:
 - (a) Section 73 – preparation and change of district plans;
 - (b) Section 74 – matters to be considered by territorial authority;
 - (c) Section 75 – contents of district plans;

- (d) Schedule 1, Part 1 – preparation, change, and review of policy statements and plans;
- (e) NPS-UD; and
- (f) NPS-FM.

National Direction

29. The following paragraphs summarise the relevant national direction applying to PC:I. A more detailed description is provided in Section 4.2 of the [s 32 report](#).

NPS-UD

30. The NPS-UD is designed to improve the responsiveness and competitiveness of land and development markets and directs councils to remove overly restrictive planning rules and plan for growth. It requires local authorities to open up more development capacity, so more homes can be built in response to demand. Section 2.1 of the [Accessibility and Demand Assessment](#) (ADA) sets out the relevant NPS-UD objectives and policies applying to PC:I and how PC:I gives effect to those policies. In particular, Policy 2 requires PNCC to “*at all times, provide at least sufficient development capacity to meet the expected demand for housing and for business land over the short term, medium term, and long term.*” Policy 5 requires district plans to enable heights and density of urban form commensurate with the greater of accessibility or relative demand.
31. Section 3 of the [Development Capacity Assessment](#) (DCA) describes how PC:I gives effect to the Policy 2 and Clause 3.2 requirement for sufficient development capacity to meet the expected demand for housing.

NPS-FM

32. The NPS-FM sets the direction for freshwater management in New Zealand through the framework of Te Mana o te Wai, which is described as the fundamental concept for the NPS-FM, recognising that protecting the health of fresh water protects the health and wellbeing of the wider environment.
33. Clause 3.5(4) requires PNCC to “*include objectives, policies and methods in the ODP to promote positive effects, and avoid, remedy or mitigate adverse effects*”

(including cumulative effects), of urban development on the health and well-being of water bodies, freshwater ecosystems, and receiving environments".

Section 32AA

34. In accordance with s 32AA I have undertaken an evaluation of the recommended amendments to provisions since the initial s 32 evaluation.
35. The s 32AA evaluation for changes proposed as a result of my consideration of submissions and further submissions is contained within the assessment of the relief sought in submissions and/or further submissions in section H of this report, as required by s 32AA(1)(d)(ii).
36. In my view, the s 32AA further evaluation contains a level of detail that corresponds to the scale and significance of the anticipated effects of the changes that have been made. Recommendations on editorial, minor, and consequential changes that improve the effectiveness of provisions without changing the policy approach are not re-evaluated.

Trade competition

37. Trade competition is not a relevant matter for PC:I. No trade competition issues have been identified in submissions or further submissions.

H. RESPONSE TO SUBMISSIONS AND FURTHER SUBMISSIONS

38. A total of 814 submission points and 69 further submission points were made on the provisions addressed in this s42A report.¹ I have identified the following key issues:
 - (a) Issue 1: The principle of residential intensification in Palmerston North.
 - (b) Issue 2: Effects of residential intensification.
 - (c) Issue 3: Whether the zone boundary is in the right place.

¹ Including SO204 (two submission points) and FS04 (two further submission points) - withdrawn on 11 July 2025.

- (d) Issue 4: Whether 17 Summerhays Street and the Huia Street Reserve should be rezoned to MRZ.
- (e) Issue 5: Whether the objectives set an appropriate outcomes framework for residential intensification.
- (f) Issue 6: Whether the policies set an appropriate framework for how residential intensification will be achieved.
- (g) Issue 7: Whether the rules are appropriately drafted to manage the effects of residential intensification.
- (h) Issue 8: Whether the notification provisions in the relevant rules are set appropriately.
- (i) Issue 9: Whether the standards applying to residential intensification are appropriate.

39. I address these key issues in turn below. The remainder of this section addresses submissions relating to scope, 'general' submissions, submissions on the notified consequential amendments arising from PC:I, submissions on definitions and submissions that apply to the entire plan change.

Submissions with no relief sought

40. There are a number of submission points where there is an inconsistency or lack of information about either the position or the relief sought. I have confirmed the following:

- (a) Rangitāne o Manawatu - SO137.7 and SO137.25 – should be 'support'.
- (b) Horizons Regional Council - SO194.2 – 21, SO194.42 – 43 and SO194.45 – relief sought should be 'retain as notified'.

Out of scope submissions

41. There are 19 submission points and three further submissions that I consider either fall outside the scope of PC:I (not being sufficiently 'on' the plan change) or raise other jurisdictional matters beyond the Council's powers.

42. Samuel Hill (SO48.2) seeks that the process for vegetation clearance and soil disturbance is amended to require submission of ecological strategies, carbon footprints and climate change mitigation plans and policies. This is opposed by Kāinga Ora (FS06.4). The Council's reporting officer on the issue of climate change, Mr Watson, does not support requiring carbon footprint calculations for development or a climate change mitigation plan as he is concerned this would deter residential intensification as a result of additional costs.² I rely on his opinion that residential intensification is inherently more carbon efficient. Amending Rule R6.3.6.1 in Section 6 of the ODP (which permits earthworks (and hence vegetation clearance) up to 500m² per every 12 months as requested by this submitter is out of scope of the plan change. I therefore recommend rejecting SO48.2 and accepting FS06.4.
43. David Bunckenburg (SO102.1) seeks that PC:I is re-written so it can be read by code and Artificial Intelligence (AI). I recommend this submission is rejected as PNCC is separately progressing with the conversion of the ODP into an e-plan format – this will address the readability of PC:I and other district plan provisions by code and AI.
44. Roanne Hautapu (SO129.5) requests that school capacity is a consideration for increasing density, especially with regard to primary school capacity, while Kevin and Ngaire Smidt (SO116.20) and Robert and Gill Norris (SO191.20) seek that new educational facilities should be required to indicate the number of pupils to be educated (Rule MRZ-R12). School capacity is a matter for MoE (including the number of pupils) – the submission is not within the ambit of PNCC's roles and responsibilities under Section 31 of the RMA. The existing controls in MRZ-R12, such as a restriction on building coverage and controls on noise levels, are sufficient in my opinion to address concerns about inappropriate density, noise and neighbourhood disturbance. I therefore recommend rejecting these submissions.
45. Horizons Regional Council (Horizons RC) (SO194.46 and 47) and Gillian Rapson (SO214.4) variously seek amendments to water and wastewater matters in Palmerston North. I have confirmed with Horizons RC that these points were not intended to be submissions – they were matters to note. With regard to SO214.4, there are specific health and building compliance issues associated with

² Statement of Evidence of David Watson, dated 25 July 2025, paragraphs 13-19.

separating and treating grey water from sewage for re-use,³ which are regulated outside the RMA. I therefore recommended rejecting these submission points.

46. Geneva Housing Ltd (SO76.1) seeks the removal of 353 and 355 Albert Street from the MRZ and re-zoning as Local Business Zone (currently zoned Residential). Nigel Hughes (SO118.1) seeks the inclusion of a property on the corner of Tutaki and Kelvin Grove roads in the MRZ (currently zoned Rural), which is opposed by Palmerston North Airport Limited (FS05.1).
47. In my opinion these submissions are not sufficiently 'on the plan change' as required by cl 7 of Schedule 1 RMA.⁴ Consideration of alternative zones for the identified properties should form part of a future review of the relevant zones (i.e. Residential Zone or Institutional Zone). Alternatively, property owners can pursue a private plan change or resource consent application. I understand this approach is being taken with the request to re-zone 353 and 355 Albert Street. Accordingly, I recommend rejecting SO76.1, SO118.1 and SO197.1.
48. Janet Shepherd (SO108.1 and 2) seeks the retention of the 9m maximum permitted activity height in Ashhurst, and for properties in Ashhurst to have sufficient room for on-site carparking (in relation to Rule MRZ-R7). As the plan change excludes Ashhurst, I recommend rejecting these submissions. As an aside, under the NPS-UD, PNCC is unable to include objectives, policies, rules or assessment criteria that would require a minimum number of on-site car parks for a particular development in the District Plan.⁵
49. Susanne Aldrich (SO114.2) seeks heritage protection for an increased number of properties, while Vicki Worker (SO182.2) seeks more direction about building materials and maintenance for three storey developments. Tayte Cozens (SO25.1) requests that Council identifies which properties are heritage properties. This is opposed by Kāinga Ora (FS06.3). Whether or not properties should have a heritage protection is a matter for a future review of ODP Section 17: Cultural and Natural Heritage. Prescribing building maintenance requirements for heritage buildings is also outside the ambit of PNCC's functions in s 31 of the RMA - it is a matter for the Building Act 2004 where required by that legislation for

³ [esr-risk-framework-evaluate-greywater-reuse-consents.pdf](#)

⁴ See *Palmerston North City Council v Motor Machinists* [2013] NZHC 1290.

⁵ NPS-UD, Clause 3.38(1).

purposes such as fire protection or noise mitigation. Accordingly, I recommend rejecting these submissions and accepting FS06.3.

50. Kāinga Ora (SO199.2) seeks the rezoning of a significant number of properties from Residential Zone to MRZ – if accepted this would increase the zone extent by nearly 16% or an additional 1,743 properties. Informed by legal advice from CR Law, who will address this matter in legal submissions, I recommend rejecting the relief sought as not being 'on' the plan change.
51. Only 26% of the properties are owned by Kāinga Ora. This creates a natural justice issue which reinforces why the submission is not 'on' the plan change associated with the relief sought – the owners of these properties may not know of the relief sought in the Kāinga Ora submission and will not have had the opportunity to comment on whether they should be in, or out, of the MRZ. Relying on the further submission process as the mechanism for that is insufficient, per *Motor Machinists Limited*.
52. I recommend rejecting SO203. 2 as the amendments sought by Enviro NZ are not 'on' the plan change – they seek relief in relation to Rule 10.6.3.3 which applies to the Residential Zone only.

In scope submission

53. Crest Hospital (SO197.1) seeks rezoning of 21 Carroll Street from Residential to Institutional Zone. This property is an anomaly insofar as approximately 75% of the site is currently zoned Institutional with the remaining 25% zoned as Residential. The Residentially zoned part of the property forms part of Crest Hospital. The site is occupied by a reception building for the hospital, for which a resource consent was granted on 29 May 2014. I consider there is merit in considering the relief sought by this submitter as it could be argued the submission is sufficiently 'on the plan change'.
54. The relief sought is for a property that is within the plan change extent. The property is already used for an 'institutional' purpose, and the change in zoning sought by SO197.1 would reflect the existing land use, rather than a desired future land use. A review of the ODP provisions confirms that the building envelope for the Institutional Zone where it adjoins the Residential Zone is smaller than for the MRZ. Accordingly, the scale of potential effects on adjoining residentially zoned

properties would be less if this part of the site was zoned Institutional rather than MRZ.

55. The s 32 report accompanying PC:I did not consider rezoning this property. In doing so an assessment under s 32AA of the RMA is required. Based on the above analysis I consider it would be more efficient and effective to rezone the relevant part of the site to Institutional Zone than to retain the notified proposal of rezoning to MRZ. I consider there are no natural justice issues as the site is owned by the submitter and there are no further submissions opposing the relief sought. There are no additional potential adverse effects as the site is already operating as a hospital. Any future, larger, building would need to comply with the ODP building height and recession planes which are less generous than the MRZ. Accordingly, I recommend accepting the relief sought by SO197.1.

General submissions

56. There are 12 submission points, and two further submissions that can be best described as 'general' submission points, as they cover a variety of topics.
57. **RMA alignment** - I recommend rejecting SO143.3 and SO181.1. Part 4 of the NPS-UD directs PNCC to change its district plan to enable intensification and this is the purpose of PC:I. While the government has signalled changes to the NPS-UD as part of its Resource Management reform programme these are yet to be proposed or gazetted.⁶ I consider PC:I is aligned with the RMA as the Council has given effect to the NPS-UD by implementing Policy 5 (as set out in the ADA) and enabling an appropriate height and density of development. Accordingly, PNCC has met the requirement in s 75(3) of the RMA.
58. **Section 32 analysis – meeting long-term housing demand** – Horizons (SO194.1) is concerned that PC:I will not enable sufficient infill capacity in the long-term to meet the demand identified in the Housing and Business Needs Assessment (HBA), and this could result in a failure to meet the Housing Bottom Lines (HBL) for Palmerston North in the One Plan RPS Policy UFD-P2 as replicated in Table 1 below. Horizons is also concerned about discrepancies between the HBA

⁶ See the commentary at paragraph 26 of this report.

numbers and PC:I. The HBA predicted a demand for 4,251 dwellings provided through infill (see Table 26 in the HBA).

Table 1 Housing bottom lines* for Palmerston North, 2023-2053

Housing bottom lines* (number of dwellings)	
Short- to medium-term July 2023 – June 2033 Includes an additional margin of 20%	Long-term July 2033 – June 2053 Includes an additional margin of 15%
3,993	5,891

59. Using the development capacity model developed to support PC:I, the DCA concluded there would be 'feasible and reasonably expected to be realised' development capacity in PC:I of 1,521 additional dwellings (including 85 from re-zoning 17 Summerhays Street, the Huia Street Reserve and 216 Ferguson Street). This assessment was based on the MfE guidance for determining such capacity, using historic building consent data. It is important to note that PC:I does not enable a set number of dwellings. Rather, the modelling predicts a particular capacity within the zone extent.
60. Appendix A of the DCA describes the model assumptions and limitations, and Appendix B of that document describes the outcome of sensitivity testing of the model to understand how the predicted feasible development capacity might change. In the DCA the Council acknowledged that the predicted capacity, as notified, was conservative, and there were limitations in the approach that had been applied to identify this capacity.
61. In response to the Horizons' submission, Ms Andrews revisited the PC:I modelling and assumptions, and undertook further sensitivity testing of the model outputs.⁷ In these paragraphs she also explains the difference between the HBA assessment of development capacity and the PC:I assessment of development capacity.
62. The results of her sensitivity testing are set out in Tables 3 and 4 in her evidence. Ms Andrews concludes that the theoretical development capacity in the MRZ could range from 3,213 additional dwellings to 6,426 additional dwellings, depending on the lot size (Table 3). The 'feasible and realistically expected to be

⁷ Statement of evidence of Stacey Andrews, dated 25 July 2025, paragraphs 17 – 38.

realised capacity is set out in Table 4. This table shows the potential range of capacity, depending on how the capacity is calculated and the average lot size. The MRZ is predicted to contribute between 60% and 75% of the HBA demand for infill development.

63. I rely on Ms Andrews opinion, at paragraph 37, that the HBA modelling approach provides a clearer estimate of infill development relative to the original PC:I approach.
64. Horizons is correct that the feasible development capacity in the MRZ does not meet the entire demand for infill as identified in the HBA, which represents a proportion of the HBL in the RPS, although Ms Andrews' revised modelling shows that the expected contribution in the MRZ is significant higher than originally predicted. I also note that the MRZ is not the only source of infill development. Residential intensification is still expected in the Residential Zone and this will make a contribution to supply, a point also made by Mr Ferguson-Pye.
65. Uptake of the enabled development capacity will also be driven by whether the market chooses to engage in residential intensification at the level anticipated by the notified provisions. There are several market factors driving this, many of which are outside the Council's control. Accordingly, the role of Council monitoring will be critical in understand whether the enabled capacity ultimately converts to the provision of new dwellings and whether the demand remains as originally predicted.
66. As Mr Ferguson-Pye confirms in paragraphs 26 - 29 of his evidence, Council has a variety of tools at its disposal to determine this:
- (a) Monitoring of plan effectiveness and efficiency, under s 35 of the RMA;
 - (b) Annual monitoring of the HBA indicators, including supply of new dwellings (This will come from monitoring the number of resource and building consents granted for infill development, both within and outside the MRZ);
 - (c) Three-yearly updates to the HBA and the Future Development Strategy.
67. I also understand that the City Planning Team is anticipating a review of the Residential Zone soon – this is an opportunity to review the provisions in that zone

to determine if more enabling residential intensification rules and standards are required.

68. Given the results of the updated modelling and sensitivity testing presented in Ms Andrews' evidence, I consider the concerns identified by Horizons about whether PC:I provides sufficient development capacity are addressed. Following helpful discussions at a pre-hearing meeting with Horizons, I understand that Horizons accepts these points. I therefore recommend accepting in part SO194.01 insofar as evidence has been provided to demonstrate there is sufficient development capacity.
69. In my opinion, further changes to the MRZ extent are not required to provide additional development capacity.
70. **Section 32 – climate adaptation scenarios** – Horizons (SO194.44) considers that the s 32 evaluation should use both SSP2-4.5 and SSP5-8.5 climate adaptation scenarios, as required by the National Adaptation Plan.⁸ The modelling underpinning the stormwater overlay uses RCP 6.0. As part of a pre-hearing meeting with Horizons, Mr Watson, Ms Wood and I met with the regional council's climate change specialist Andrew Watt to discuss the climate change scenarios underpinning PC:I.
71. Mr Watson describes the different climate change scenarios in paragraphs 20 – 24 of his evidence and he concludes, at paragraph 26, that use of climate change scenario RCP 6.0 is appropriate for the flood modelling and hence to underpin PC:I. I rely on his evidence in this regard. As the RMA does not require an update to s 32 reports in response to submissions, and Mr Watson considers that "*assessment against SS5-8.5 was not necessary for determining rules for all new developments within the MRZ ...*"⁹, I recommend rejecting SO194.44.
72. I discuss the direct application of climate change scenarios to PC:I when assessing the relief sought to MRZ-S11 – Minimum Floor Levels, in paragraphs 533 - 539 of this report.

⁸ [Urutau, ka taurikura: Kia tū pakari a Aotearoa i ngā huringa āhuarangi | Adapt and thrive: Building a climate-resilient New Zealand](#)

⁹ Statement of Evidence of David Watson, dated 25 July 2025, paragraph 27.

73. **Section 32 – correct version of One Plan RPS-UFD chapter** – Horizons is correct that the evaluation in Appendix B of the s 32 report was based on an older version of the RPS Urban Form and Development (RPS-UFD) chapter of the One Plan. I do not consider this error to be a material issue for decision-making on PC:I, as Horizons' submission confirms that relevant objectives and policies in PC:I align with RPS-UFD-O1, RPS-O3, RPS-O4, RPS-UFD-O5, RPS-UFD-P1, RPS-UFD-P2,¹⁰ RPS-UFD-P4, UFD-P6 and RPS-P8.¹¹ However, for the sake of completeness and to ensure that the requirement in Section 75(3) of the RMA to give effect to any regional policy statement is met, I have assessed PC:I against the correct version of RPS-UFD. This assessment is provided in **Appendix 5** of this report. On this basis, I recommend accepting SO194.45.
74. **Chapter 10A Introduction** – there are three submission points on the Introduction wording. Intensification in existing urban areas means that there is already walking, cycling and public transport infrastructure in place, rather than potentially needing to construct new infrastructure as part of greenfield development. Accordingly, I recommend rejecting SO129.4. I recommend accepting SO203.3's proposed amendment to the Chapter 10A introduction as I agree that denser residential development should incorporate space for waste and waste recycling. I also recommended accepting SO137.1 as no changes are proposed to the relevant paragraph in the chapter Introduction. A s 32AA evaluation is not required, as this is a minor amendment which does not change the policy intent of the chapter.
75. **Requirement for trees and other vegetation** - with regard to SO48.3, as notified, MRZ-S5 requires a landscaped area of at least 20% for each residential unit, papakāinga or community house, which includes at least one specimen tree. MRZ-P8 requires incorporation of water sensitive design methods for developments of four or more residential units. Constructed wetlands are a potential water sensitive design solution although they are more likely, in my understanding, to be appropriate for larger developments. For this reason, I recommend accepting in part SO48.3 and accepting FS06.5.

¹⁰ Subject to SO194.1.

¹¹ RPS-UFD-O2 and RPS-UFD-P3 not relevant because they relate to urban growth on HPL and noting that at the time of writing this s42A report, Plan Change 3 to the One Plan is partially operative, as there are appeals to UFD-I3, UFD-O3 and UFD-P4.

76. **Implementation** - I recommend accepting SO167.1 in part insofar as it relates to implementation, as I agree this is critical. As with other plan changes, Council officers will need to consider how the plan change will be implemented and monitor implementation in accordance with the Council's s 35 of the RMA responsibilities.¹² Lack of integration with public transport has been addressed in identifying the zone extent – there is a criteria related to distance from bus stops. Increases in on-street car parking is not an RMA matter. This is managed by the Council's Transport and Parking Bylaw, under the Land Transport Management Act 2013.
77. **Development cost barriers** - with regard to SO181.2, I recommend accepting in part the submission point insofar as it relates to removing development cost barriers. PC:I enables residential intensification up to three residential dwellings in the MRZ without a resource consent (unless the property is located in the Stormwater Overlay) and this removes development cost barriers. PC:I retains the requirement for a subdivision consent in the MRZ, to enable consideration of relevant site-specific matters. PC:I enables building heights to 11m (equivalent to a three-storey building) but it does not require buildings to be constructed to that height, so is nothing preventing the continued development of two storey infill housing. I note however that continuing historic dwelling typologies alone will not achieve the desired increase in housing supply and choice.
78. **Implementing the National Planning Standards** - Palmerston North City Council (PNCC) (SO166.38) proposes to amend the words "lot" and "lots" to "allotment" and "allotments" throughout chapter 7B, as "allotment/s" is defined in the National Planning standards, which the Council is required to implement. Accordingly, I recommend accepting SO166.38.

¹² See Section 25: Monitoring, of the ODP.

79. I recommend the following amendments

Introduction

...

Palmerston North's climate is changing – in the future the city will be warmer and drier, and rainfall events will be more intense. Denser residential *development**, which is connected to active and public transport, and energy efficient housing, which optimises solar access, provides shade, manages on-site stormwater, incorporates space for waste and waste recycling and incorporates appropriate landscaping, will help reduce greenhouse gas emissions and create resilient housing and communities.

80. I consider that these amendments to be more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions and they provide context for subsequent provisions in the MRZ. There are no additional environmental, economic, social or cultural costs arising from these amendments.

Submissions on consequential amendments

81. There are six submissions on the consequential amendments to other parts of the ODP which are required to give effect to PC:I.

82. Karen Wilton (SO74.3) supports the inclusion of the medium density zone within Section 6 of the ODP as it relates to signage requirements. I recommend accepting the relief sought.

83. Powerco Ltd (Powerco) (SO107.5) supports retention of the proposed reference to Powerco Limited in Section 5.4(d) of the ODP. I recommend accepting this submission.

84. Rangitāne o Manawatu (SO137.42) supports the definition of 'Ancestral land', as proposed for introduction in Chapter 4A of the District Plan, and requests that the definition should apply across all zones by including the definition within the definitions section of the ODP. The term 'ancestral land' is nested within the definition of papakāinga proposed for amendment in Chapter 4 (via consequential amendment). As a result, I consider the outcome sought by SO137.42 is likely to be achieved and I recommend accepting SO137.42. In doing so, I consider a minor amendment would be required to the definition of 'papakāinga', to italicise 'ancestral land' so that it's clear that it is a defined

term. In the box at paragraph the notified changes as underlined or ~~strike through~~. The proposed consequential amendment is red underline.

85. Rangitāne o Manawatu (SO137.43) supports the revised definition of 'papakāinga' on the basis that it will enable such developments on Māori and whānau land that is not in multiple ownership. In my opinion a definition does not, in and of itself, enable papakāinga development. The discretionary activity status for papakāinga in the Residential Zone (Chapter 10 of the operative District Plan (ODP)) would remain.¹³ What would change as a result of PC:I is a consistently applied definition across the ODP. I therefore recommend accepting SO137.43.
86. Enviro NZ (SO203.1) seeks further amendments to the list of information required to be submitted with an application for resource consent, to include waste storage. I agree this information should be included with any land use consent application and therefore recommend accepting the relief sought. I consider there are further consequential amendments required to this section of the ODP to reflect the additional requirements for intensification in the MRZ, to enable an understanding of matters such as stormwater attenuation, outdoor living areas and outlook space and vehicle accesses. The recommended drafting is included in the table in paragraph 86. The notified text is underlined, while the additional text is red underlined.
87. Kāinga Ora (SO199.47) opposes the notified amendment to the Chapter 10 – Residential Zone Introduction, on the basis this suggests a prevention of intensification within the Residential Zone. I disagree this is the outcome. There remain rules in the Residential Zone for intensification (i.e. 10.6.4.3) and these are not changing. I consider removing this text from the Introduction 'levels the playing field' insofar as there is no longer a reference to intensification being an issue and the text would no longer focus on the perceived negative effects of intensification. I therefore recommend rejecting SO199.47.

¹³ I do not support the discretionary activity status but acknowledge that changing this is out of scope of PC:I.

88. I recommend the following amendments:

Definition of papakāinga

Papakāinga means one or more residential units and associated social and cultural activities established on **ancestral land** by an iwi, hapū or whānau of the Palmerston North district that enables the occupation by members of the same whānau, hapū or iwi. is a form of housing development which occurs on multiply owned Maori or ancestral land. Traditionally, the literal meaning of Papakāinga housing is, 'a nurturing place to return to'.

Section 5.4(c) Proposed Development Information and Plans

Where relevant, the applicant must provide the following information and plans of the proposed development, including:

- i. A description of the activity for which consent is sought and its location.
- ii. Details of the appearance of any buildings.
- iii. Floor plans.
- iv. A calculation of site coverage, permeable surface and landscaping coverage, and the area of each building and structure in square meters, including accessory buildings.
- v. Location of outdoor living space
- vi. All landscape design, site planting and fencing.
- vii. Location and size of any stormwater attenuation devices.
- viii. Location of proposed activities, including vehicle crossing(s), vehicle and cycle parking, loading, circulation and manoeuvring areas, ~~and~~ provision for pedestrian and vehicle access and rubbish and recycling storage and collection areas.
- ix. Elevations of any buildings and structures showing their relationship to the street and any buildings on adjacent sites, including the location and measurements of outlook space.
- x. Height relative to existing ground level.

89. I consider that these amendments to be more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions and ensure there is sufficient information provided with land use consent applications to enable assessment against the relevant provisions in the MRZ. There are no additional environmental, economic, social or cultural costs arising from these amendments.

Definitions

90. There are six submission points and one further submission point on definitions.
91. Kāinga Ora (SO199.3) supports Chapter 4A and seeks that all changes to definitions as informed by the National Planning Standards (NPStds) are retained. I recommend accepting in part this submission point, as I have recommended changes (albeit minor) to Chapter 4A definitions to response to other submissions.
92. I recommend the following submission points are accepted.
- (a) **Rail corridor** – PNCC (SO166.51) seeks a minor amendment to this definition, to replace DP with District Plan.
 - (b) **Education Facility** – MoE (SO196.1) seeks this is retained as notified.
93. I recommend accepting in part submission points SO184.8 and SO184.23 (Chris Teo-Sherrell) as I see benefit in including a definition of 'infrastructure' in Chapter 4A of the District Plan (DP), which I propose is the same as in the RMA.¹⁴ This addresses Mr Teo-Sherrell's concern about the type of infrastructure intended to be covered by MRZ-O5 and MRZ-P11.
94. Infrastructure is also referred to in MRZ-O2, but the RMA definition is not appropriate in this context because the existing and planned infrastructure referred to in MRZ-O2(g) is 'development infrastructure', as per the NPS-UD cl 3.4(3) requirement for development capacity to be infrastructure-ready. I have also considered whether introducing a definition for 'infrastructure' would have unintended consequences for the remainder of the ODP. In my opinion this would not be the case, as the definitions in Chapter 4A apply only to Chapters 10A and 7B. The ODP does not include a definition for infrastructure – where this term is referenced the RMA definition would apply.
95. To avoid expanding MRZ-O2(g) beyond its intended scope I consider the following consequential amendments are required as a result of including a definition for infrastructure in PC:l:

¹⁴ There is no definition in the National Planning Standards 2019.

- (a) Include a definition for 'development infrastructure' in Chapter 4A – this definition would be the same as the NPS-UD, and
 - (b) Amend MRZ-O2(g) to refer to development infrastructure only.
96. MoE (SO196.2) (supported by Crest Hospital Limited (FS02.1) seeks the addition of a definition for 'additional infrastructure' to provide clarity to plan users, and to support MOE submission SO196.4 to amend MRZ-O2(g). In paragraph 145 I recommend rejecting SO194.4 as I consider this would expand the scope of MRZ-O2(g) beyond that intended by the drafting and hence I consider the definition is not required. I therefore recommend rejecting SO196.2 and FS02.1.
97. I recommend the following amendments:

Infrastructure has the same meaning as section 2 of the Resource Management Plan (set out in the box below)

- a) pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, or geothermal energy:
- b) a network for the purpose of telecommunication as defined in section 5 of the Telecommunications Act 2001:
- c) a network for the purpose of radiocommunication as defined in section 2(1) of the Radiocommunications Act 1989:
- d) facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person—
 - i) uses them in connection with the generation of electricity for the person's use;
and
 - ii) does not use them to generate any electricity for supply to any other person:
- e) a water supply distribution system, including a system for irrigation:
- f) a drainage or sewerage system:
- g) structures for transport on land by cycleways, rail, roads, walkways, or any other means:
- h) facilities for the loading or unloading of cargo or passengers transported on land by any means:
- i) an airport as defined in section 2 of the Airport Authorities Act 1966:
- j) a navigation installation as defined in section 2 of the Civil Aviation Act 1990:
- k) facilities for the loading or unloading of cargo or passengers carried by sea, including a port related commercial undertaking as defined in section 2(1) of the Port Companies Act 1988:
- l) anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166.

Development Infrastructure has the same meaning as in Clause 1.4 of the National Policy Statement for Urban Development 2020 (set out in the box below) means the following, to the extent they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002): network infrastructure for water supply, wastewater, or stormwater land transport (as defined in section 5 of the Land Transport Management Act 2003).

MRZ-O2 Built development* in the Medium Density Residential Zone

Built development* in the Medium Density Residential Zone positively contributes to achievement of a predominantly residential urban environment that:

...

- g. Integrates with existing and planned development infrastructure;

...

98. I consider these amendments are the most appropriate way to achieve the purpose of the RMA. They will assist plan users with interpreting the relevant plan provisions and they are consistent with higher order documents. There are no additional environmental, economic, social or cultural costs arising from the recommended change.

Submissions on the entire plan change

99. There are 15 submissions and two further submissions that have been classified as applying to the entire plan change.¹⁵ I make the following recommendations:

- (a) Reject the request to include a requirement for accessible homes (SO01.1, SO129.6 and SO152.1), accept FS06.16, FS06.26 and accept in part FS01.1 insofar as it relates to there being other methods for achieving accessibility. There is no requirement in the RMA nor the NPS-UD to provide a percentage of accessible housing – there are other methods under other legislation such as the Building Act to achieving accessibility. PC:I gives effect to the NPS-UD Policy 1 requirement to enable a variety of homes through MRZ-O1 and MRZ-O2, which both refer to the MRZ being characterised by a mix of building typologies and heights, and this could include accessible homes. There is no requirement in the ODP for

¹⁵ **SO01.1**, Patricia Cardinelli-Wayne; **FS01.1**, Leith Consulting; **SO48.1**, Samuel Hill; **SO94.1**, Ronald Raghwan; **SO99.1**, Gladys Vining; **SO103.1**, Doug Strachan; **SO128.1**, Jordan Neall; **SO129.6**, Roanne Hautapu; **FS06.16**, Kāinga Ora; **SO129.6**, Roanne Hautapu; **SO132.1**, Janet Stirling; **SO138.1**, Christine Rynhart; **SO141.1**, Deidre Southee; **SO144.1**, Karen Nistor; **SO145.1**, Shraddha Dabholkar; **SO148.1**, Emily Doody; **SO154.1**, Katreena Collins; **SO195.1**, Age-Friendly Palmerston North.

accessible parking for residential dwellings – the existing accessible parking standards apply to non-residential activities.

- (b) Age-Friendly Palmerston North (SO195.1) sought greater recognition in PC:I for the housing needs of older people and those living with mobility issues. This submitter also raised environmental concerns such as loss of permeable areas and trees. I have addressed the relief sought by this, and other submitters, with regard to accessible homes in the preceding paragraph.
- (c) With regard to the other concerns raised by SO195.1, the loss of permeable areas and trees is addressed by the requirements in MRZ-S9 for a minimum permeable area and MRZ-S5 for a specimen tree, and the requirement in MRZ-S16 and SUB-MRZ-S4 to avoid the loss of street trees when forming a new vehicle access. I have recommended changes in response to the relief sought by other submitters, to MRZ-S3, to require a 5.5m minimum setback from the front boundary for any parking area, and MRZ-S16, to introduce pedestrian visibility splays for vehicle accesses. These will assist in addressing concerns about safety and accessibility for older people more generally. I therefore recommend accepting SO198.1 in part, insofar as some of the relief sought is either already part of the notified provisions or has been addressed via recommended amendments.
- (d) SO195.1 also raised concerns about parking – as I have discussed elsewhere in this report, Council cannot set a minimum on-site parking requirement.
- (e) Reject SO48.1 because requiring a resource consent for all residential intensification (as required in the ODP), does not enable residential intensification. I do not agree that PC:I sets a "worrying precedent" as the requirement to enable intensification applies to Tier 1 and Tier 2 councils across the motu as a result of the government's direction in the NPS-UD.
- (f) Reject SO94.1 as there is no heritage height control within the notified standards.

- (g) Reject SO103.1 and SO128.1 – the [Transport Assessment](#) which forms part of the evidence supporting PC:I concluded there would be minor positive impacts on traffic congestion from residential intensification (section 6.2). As the Council cannot impose minimum parking requirements for development it cannot require garages or visitor parking – it is up to developers to determine how they manage on-site parking.
- (h) Accepting SO140.1 and rejecting SO154.1, SO141.1, SO144.1, SO145.1 and SO148.1 – PNCC is required by the NPS-UD to implement this plan change. Withdrawing it and keeping medium density to specific areas as proposed by SO154.1, in greenfield areas or in newer areas, does not address the need for housing to meet the City's existing and future housing needs. The concerns raised by submitters like increased crime, poorer health outcomes and impacts on property values are not RMA matters. The remaining issues are appropriately addressed by the notified standards.
- (i) Rejecting SO138.1, which is concerned about the suitability of soils in Dittmer Drive for intensification. Foundation design for different soil conditions is a matter for the Building Act 2004 and the Building Code rather than the RMA. At the building consent stage Council building officers will assess whether a geotechnical and/or liquefaction potential assessment is required. A geotechnical and/or liquefaction assessment may also be required at the subdivision stage if there is considered to be a significant risk of natural hazards, such as from earthquakes.
- (j) SO99.1 sought better info from the Council to make a submission in particular in relation to the maps. The Council's website included an interactive map which enabled potential submitters to identify whether their property was in or out of the proposed MRZ. The website also included a visualisation of the proposed MRZ standards.¹⁶ I therefore recommend rejecting this submission.

¹⁶ [Proposed Plan Change I: Increasing housing supply and choice | Palmerston North City Council](#)

I. ISSUE 1: THE PRINCIPLE OF RESIDENTIAL INTENSIFICATION IN PALMERSTON NORTH

100. There are 72 submissions regarding the principle of residential intensification in Palmerston North, of which 42 oppose PC:I,¹⁷ 11 seek amendments¹⁸ and 19 support PC:I.¹⁹ There is one further submission, from Kāinga Ora (FS06.12). I have grouped my responses according to these submitter positions.
101. Submitters opposing PC:I seek that the plan change is deleted or that limitations are applied to intensification which either retain the status quo in the ODP or make development more restrictive (for example limit housing to one storey when the ODP allows for housing up to 9m as a permitted activity²⁰). There are also several submitters who do not identify particular relief.
102. Main themes of opposing submitters include concerns about the effects of intensification, such as loss of privacy and sunlight access, increased noise, negative impacts on street character, increased demand for on-street parking, traffic and congestion, loss of property value, increased flooding and stormwater, increased rates to pay for more infrastructure and anti-social effects and/or increases in crime, and impacts on heritage values. Some submitters consider that intensification is not required and that the Council should focus on greenfield expansion instead.

¹⁷ **SO06.1**, John Mullinger; **SO08.1**, Ruichen Li; **SO09.1**, Aya Al-Ibousi; **SO10.1**, Holly Scott; **SO12.1**, Goodwin Family; **SO16.1**, Kathryn Stowell; **SO16.5**, Kathryn Stowell; **SO19.1**, Rob Belchamber; **SO24.1**, Susan Swan; **SO29.1**, Lisa Greer; **SO35.1**, Hayden Giles; **SO36.1**, Mark and Zelda Anderson; **SO39.1**, Steve Billington; **SO44.1**, Angela Oliver; **SO50.1**, Con Fraser; **SO59.1**, Donna Cummerfield; **SO73.1**, Kathriona Benvie; **SO75.1**, Chris Robertson; **SO89.1**, Mai Wiki-Holland; **SO101.1**, Miranda Sage; **SO104.1**, Hern Teo-Sherrell; **SO115.1**, Sarah Ruawai; **SO115.2**, Sarah Ruawai; **SO115.3**, Sarah Ruawai; **SO123.1**, Nicola Wardlaw; **SO124.1**, Karina Hapeta; **SO127.1**, Rachelle Tangi; **SO130.1**, Fraser Abernethy; **SO134.1**, Wisanu Srichantra; **SO136.1**, Bella Deacon; **SO143.4**, Joanne and Robert Wilson; **SO146.1**, David Hill; **SO147.1**, Renee Thurston; **SO149.1**, Steve Carter; **SO156.1**, Andrew and Julie Phillips; **SO157.1**, Pamela Bridewell; **SO168.1**, Ivan Johnstone; **SO173.1**, Vanesa Gonzalez Freijo; **SO190.1**, Russell Gibson; **SO198.1**, Brett Hill and Tom Santing; **SO201.1**, Jonathan and Jill Hogg; **SO212.1**, Brett Alcock, Cindy Tan and June Alcock; **SO213.1**, Andrea and Justin Coker.

¹⁸ **SO104.1**, Hern Teo-Sherrell; **SO104.5**, Hern Teo-Sherrell; **SO105.3**, Murray Kidd; **SO122.1**, Chris Price; **SO143.1**, Joanne and Robert Wilson; **SO143.2**, Joanne and Robert Wilson; **SO153.1**, Tania Kopytko; **SO159.3**, John and Margaret Wood; **SO179.2**, Rosemary Watson; **SO214.8**, Gillian Rapson

¹⁹ **SO02.1**, Carolyn Bashford; **SO05.1**, Jaskaran Singh; **SO18.1**, Shane Telfer; **SO20.1**, Ruth Jackson; **SO23.1**, Graeme Fenemor; **SO37.1**, Roman Konopka; **SO38.1**, Lillian Obonyo; **SO40.1**, Amardeep Singh; **SO45.1**, Eru Henare-Findlay; **SO64.1**, Yen Cher Koh; **SO97.1**, Rajwinder Harike; **SO98.1**, Richard Prasad; **SO125.1**, Shari Scanlon; **SO126.1**, Kevin Guan; **SO133.1**, Keegan Leask; **SO140.1**, Spencer Lilley and Penelope Tucker; **SO174.1**, Connie and Kerry Zuppich; **SO188.1**, Te Pū Harakeke—Community Collective Manawatū; **SO205.1**, Ben Foster.

²⁰ ODP Rule R10.6.1.1 – performance standard (a).

103. Most of the submissions seeking amendments to PC:I have not identified either a specific PC:I provision they consider requires amendment or any specific relief. However, their reasons for seeking amendments generally relate to concerns about the effects of intensification.

Response to submissions/recommendations

104. **Opposing submitters** - the NPS-UD applies to all Tier 1 and Tier 2 local authorities with an urban environment in their city or district.²¹ PNCC is a Tier 2 local authority and Palmerston North city meets the definition of an urban environment. Tier 2 local authorities are required by the NPS-UD to notify a plan change to enable heights and density of urban form commensurate with the greater of the level of accessibility or relative demand for housing.²² Policy UFD-P2 in the One Plan requires PNCC to provide sufficient development capacity to meet the housing bottom lines for Palmerston North.²³ Section 75(3) of the RMA requires that the PNCC district plan must give effect to any national policy statement and regional policy statement. Accordingly, declining to proceed with PC:I would fail to give effect to the NPS-UD as required by section 75(3).
105. I acknowledge concerns about the potential effects of residential intensification. Intensification will change the environment for existing residents. Policy 6 of the NPS-UD recognises that intensification may result in significant changes to an area, and that these changes may both detract from and improve amenity values. Importantly, the policy clarifies that changes in amenity values are not, of themselves, an adverse effect. The status quo would also not address One Plan Policy UDS-P2 or meet the demand identified in the PNCC's most recent [Housing and Business Development Capacity Assessment](#) (HBA).
106. Some of the effects identified by submitters as being caused by intensification are not matters that can be properly considered under the RMA (i.e. loss of property values, enablement of anti-social behaviour/increases in crime, effects on on-street parking). Those effects which are relevant RMA matters would be

²¹ Defined as any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that:

(a) is, or is intended to be, predominantly urban in character; and

(b) is, or is intended to be, part of a housing and labour market of at least 10,000 people.

²² NPS-UD – Policy 5.

²³ 5,046 additional dwellings between 2021 and 2031, and 7,925 additional dwellings between 2021 and 2051.

managed via the MRZ standards – these set an envelope within which development has been determined to have acceptable effect on adjoining properties, including in relation to sunlight access, shadowing, flooding and stormwater, minimum permeable areas etc.

107. Several submitters raised concerns about infrastructure capacity, primarily in relation to three waters infrastructure, and I acknowledge that this is an existing issue in Palmerston North. The infrastructure servicing assessments prepared to support PC:I addressed this concern and concluded that, where there are existing capacity issues, there is funding in the Long Term Plan (LTP) to address these.²⁴
108. Submitter concerns about on-street parking, including loss of parking, suggestions for prohibiting over-night on street parking, concerns about increases in use of on-street parking or reduced safety for children playing in streets cannot be directly addressed through PC:I. On-street parking is managed by PNCC via the Transport and Parking Bylaw, under the Land Transport Management Act 2003. Ms Fraser advises that PNCC can develop a Comprehensive Parking Management Plan to manage parking if parking pressures arise from the removal of minimum parking. I rely on Ms Fraser's opinion that additional demands on kerbside parking as a result of PC:I can be accommodated without the need for such a management plan.²⁵
109. SO93.5 supports a focus on greenfield development areas such as Kikiwhenua and Kākātangiata and borrowing against development contributions and future rates to fund infrastructure. Relying on greenfield development areas is insufficient to meet the overall housing bottom lines in One Plan Policy OFD-P2 or the housing demand identified in the HBA. Table 26 of the HBA shows that while there is a 30-year predicted demand for 5,138 dwellings in greenfield areas, there is also a 30-year predicted demand for 4,251 dwellings provided through infill. PNCC is also required by the NPS-UD to enable residential intensification, which is the purpose of PC:I. On this basis, I recommend this submission is rejected.

²⁴ [Stormwater Servicing Assessment](#), [Wastewater Servicing Assessment](#) and [Water Servicing Assessment](#)

²⁵ Statement of Evidence of Harriet Fraser, dated 25 July 2025, paragraph 16(g) and 16(h).

110. SO143.2 raised considers that the population growth statistics do not reflect the actual population growth in Palmerston North over the last 24 years. SO75.1 considers the predicted growth will not occur in Palmerston North, while SO181.1 considers that the city's population is in decline. In paragraphs 51 – 56 of her evidence, City Economist Ms Andrews describes the current and historic population statistics. I rely on her evidence that the city's population and housing growth in recent years has exceeded historical growth, and I therefore recommend rejecting these submissions.
111. There are no specific heritage protections for Manapouri Crescent and Elmira Avenue in the ODP. As a result, there is no justification for applying different standards to this part of the MRZ as sought by SO16.1. PC:I does not require intensification, rather it provides an enabling pathway for intensification should a property owner decide to pursue it. It will be up to individual landowners to determine if and when), they may wish to sell or develop their properties (if at all).
112. On the basis of the above analysis, I recommend rejecting all opposing submissions considered in this issue, either because withdrawing the plan change would fail to give effect to the NPS-UD requirements for residential intensification, the matters raised are either not RMA matters, or the MRZ standards will appropriately manage the relevant RMA effects within the proposed envelope for a permitted activity.
113. Finally, I note that a resource consent will still be required for development of more than three units, or for development in the Stormwater Overlay. I have addressed submissions seeking that all residential intensification should require a resource consent and the adjoining neighbours be notified under Issue 8, at paragraph 516 of this report.
114. **Submitters seeking amendments** – the amendments sought by submitters include requesting the introduction of controls regarding playing music, number of pets, blocking of streets to create cul-de-sacs to facilitate street activities, introducing compensation for owners of adjacent properties who experience a loss of capital and enjoyment value, no overnight on-street parking, minimal impact on street character and requirements for a mix of housing. Kāinga Ora (FS06.12) opposes any relief relating to requiring a mix of housing (in SO104.1).

115. I recommend rejecting these submissions for the same reasons as for submitters opposing the plan change. With the exception of a request to limit the height of multi-storey units to no more than two storeys – none of these controls are relevant matters under the RMA or within the scope of PNCC's functions. I therefore recommend rejecting these submissions and accepting FS06.12.
116. **Submitters supporting PC:I** – given my recommendations to reject the submissions opposing or seeking amendments to PC:I, I recommend accepting all but one of the submissions supporting PC:I. While SO125.1 supports PC:I, the relief sought also seeks to control who would be entitled to live in infill housing. This is not an RMA matter and so I recommend this submission is rejected.

J. ISSUE 2: WHETHER THE MRZ BOUNDARY IS IN THE RIGHT LOCATION

117. There are 58 submission points on the extent of the MRZ. Of these, 50 oppose the zone extent or seek amendments to it,²⁶ while 8 support the zone extent as notified²⁷. There is one further submission – Kāinga Ora supports SO22.1 (FS06.2).
118. Submissions either opposing or seeking amendments to the zone extent generally address the following themes:
- (a) Various properties and/or areas should be excluded from the zone.
 - (b) The zone extent should be reduced because of concerns about increases in on-street parking and congestion, impacts on property value, impacts on character, potential future occupants, capacity of

²⁶ **SO03.1**, Collette Martin; **SO07.1**, Robert Goddard; **SO11.1**, Michael Mccavana; **SO13.1**, Aous Al-Ibousi; **SO16.3**, Kathryn Stowell; **SO17.1**, David Brooks; **SO26.1**, Adrian Morgan; **SO27.1**, Carole Hill; **SO28.1**, Kell and Antonio Wood; **SO30.1**, Jean Tipping; **SO41.1**, Bev McKay; **SO42.1**, Ikap Holdings Limited; **SO49.1**, Melissa Viviers; **SO52.1**, Hayley Steele; **SO57.1**, Philip Robins; **SO58.1**, Sarah Harris; **SO63.1**, Allan Anderson; **SO66.1**, Jan Schmid; **SO74.4**, Karen Wilton; **SO77.1**, Rachel O'Dea; **SO79.4**, Stephen Haslett; **SO80.1**, Martin Diprose; **SO90.1**, Neil Stirling; **SO95.1**, Sandra Powell; **SO106.1**, David Jochem Investments Ltd; **SO112.1**, David Hillary; **SO117.1**, Ash Garstang; **SO139.1**, Ian Craig Stevens; **SO142.1**, Ben van der Spuy; **SO144.1**, Karen Nistor; **SO145.1**, Shraddha Dabholkar; **SO148.1**, Emily Doody; **SO149.2**, Steve Carter; **SO150.1**, Raewyn Greenlees; **SO154.1**, Katreena Collins; **SO155.1**, Rose Ogrian; **SO162.1**, Peter French; **SO169.1**, Jennifer Orange; **SO171.1**, Anne Allan; **SO172.1**, Warren Walton; **SO179.1**, Rosemary Watson; **SO187.1**, Fiona Wilson; **SO189.1**, Therese McManus; **SO192.1**, Rex Voelkerling; **SO207.1**, Mary Pattie; **SO208.1**, Development Nous; **SO211.1**, Ben Gadsby; **SO214.1**, Gillian Rapson.

²⁷ **SO16.4**, Kathryn Stowell; **SO22.1**, Nate Sextus; **SO33.3**, Paul J Moughan; **SO60.1**, Dhaval Sevak; **SO83.1**, Taine Leader; **SO93.5**, Grant Binns; **SO100.1**, Olesia Apostolova; **SO164.2**, David Lane.

Council infrastructure, capacity of schools, GPs etc, lack of future building maintenance, shading, effects of stormwater and increases in crime.

(c) The criteria used to determine the zone extent should be revised, primarily because of disagreement about public transport accessibility.

119. Supporting submissions on zone extent do not appear to have a consistent message for the purpose of summary. For example, some submitters who express support for the zone extent, on closer reading of their submission, appear to be seeking amendments or opposing the zone extent.

Response to submissions/recommendations

120. I have reviewed all submissions seeking that specific properties and/or areas are excluded from the MRZ and I recommend rejecting the majority of the relief sought, as set out in the Accept/Reject table in **Appendix 1**. The streets and areas requested to be excluded all meet the Council's accessibility criteria as set out in the ADA.

121. The zone has been explicitly defined to include only existing Residential-zoned land. Areas close to The Square have been excluded because they are zoned as either Inner or Outer Business and rezoning these as Medium Density Residential may undermine the commercial heart of Palmerston North. The age of housing, whether it is considered to be so old as to benefit from redevelopment or too new to be included in the zone, is not a driver of the zone extent.

122. Ms Fraser considered accessibility and frequency of bus services in her [Transport Assessment](#), which informed the preparation of the plan change, and she has assessed the requests for zone extent changes from a parking and transport perspective in Table 1, row 14 of her evidence. Her conclusions inform my recommendations. In response to concerns about public transport accessibility and congestion, I rely on paragraph 16(b) of her evidence, that PC:I is predicted to result in a small reduction in congestion, because it is focused closer to the city centre and local amenities.

123. In response to requests to reduce the zone extent because of the increased number of vehicle crossings and numbers of vehicles, I note that proposed MRZ-S16 control the number of vehicle crossings per site. However, there are no controls over the number of vehicles per property in the MRZ, just as there are no such controls for existing development within the Residential Zone.
124. There are two submissions seeking the removal of the MRZ from parts of the city which are not proposed for inclusion:
- (a) SO11.1 – exclude Whiskey Creek (Mātangi) floodplain - this area was subject to a private plan change which became operative in 2023.²⁸ I recommend accepting the relief sought because this location is not included in the proposed MRZ extent. Issues relating to developing in this location, including flood risk considerations, has already been assessed as part of that private plan change process. I recommend the relief sought is accepted, on the basis that this location is not proposed for inclusion in the MRZ.



Figure 1: Location of Mātangi plan change area

²⁸ [Mātangi \(Whiskey Creek\) residential area private plan change | Palmerston North City Council](#)

- (b) SO77.1 seeks the exclusion of Hobson Street, Takaro, until stormwater problems are fixed. Hobson Street is not proposed for inclusion in the MRZ, and on that basis I recommend accepting the relief sought.
125. There are several submitters seeking the exclusion of Elmira Crescent and Manapouri Street (including SO16.3 and SO57.1) on the basis this area is identified as a 'garden suburb' and densification would impact on property values and amenity and character, and Tyne Street as it is on a heritage trail. SO16.2 seeks a requirement for resource consent for any building or alterations in Elmira Crescent and Manapouri Street because of their heritage values. These properties are not identified as a garden suburb in the ODP and there are no existing planning protections on these streets that would warrant different treatment under PC:I. The impact of intensification on property values is not an RMA matter. Policy 6 of the NPS-UD is clear that a reduction in "aesthetic attractiveness" or amenity values is not, of itself, an adverse effect when making decisions that affect urban environments, such as PC:I.
126. Several submitters seek the removal of properties in the Lakemba Park subdivision from the MRZ (Royal Oak Drive and Rosebank Avenue) on the basis there is an existing covenant preventing subdivision (SO139.1, SO150.1, SO172.1). Covenants are a civil agreement between the developer and the purchaser. The Council is not responsible for enforcing this covenant, and therefore this is not a reason to exclude properties on these streets from the MRZ. As I understand it, however, if the covenant remains enforceable, it will continue to apply regardless of the zoning under the District Plan.
127. Concerns about impacts on character, potential future occupants, lack of future maintenance and school capacity are also not matters considered under the RMA.
128. Regarding shading concerns, Mr Burns addresses concerns about increased shading from residential intensification in his evidence at paragraph 50(a), concluding that the proposed MRZ standards reduce potential shading compared to the MDRS.

129. Regarding zone boundaries, Mr Burns also addresses SO117.1, which seeks a zone extent amendment, so it does not cut through the middle of residential blocks. I rely on Mr Burns' conclusion that "*mid-block zone boundaries allow for a back-to-back relationship*" and that application of the ODP Height In Relation to Boundary ("**HIRB**") will appropriately manage effects on properties adjoining the zone. I rely on Mr Burns' view that it is appropriate to have a mid-block zone boundary to enable coherent street environments.²⁹
130. While school capacity is not an RMA matter, I note that as part of preparing the Future Development Strategy for Palmerston North, the Ministry of Education confirmed that there is sufficient capacity within the existing school network and new schools are not required to support growth over the next 30 years.³⁰
131. Concerns about on-street parking management and some aspects of road safety are primarily addressed through the Council's existing [Traffic and Parking Bylaw](#) under the Land Transport Management Act 2003. Ms Fraser, the Council's Transport and Traffic Planning expert, considers that any additional demands on kerbside parking as a result of PC:I can be managed through existing mechanisms.³¹
132. On a related matter, a requirement for on-site parking for residential development is no longer something the Council can include in the district plan. The NPS-UD required PNCC, and other Tier 1, 2 and 3 territorial authorities, to remove any objectives, policies, rules or assessment criteria that required minimum on-site car parking.
133. In response to submitters concerned about infrastructure capacity, whether it is three waters or open space, the Three Waters servicing assessments confirmed there was either sufficient capacity in the network or programmed and funded upgrades to improve capacity and performance, as set out in Table 2 in the Development Capacity Assessment. The [Parks Servicing Assessment](#), prepared to support the s 32 assessment, concluded that additional reserves would be required to meet a 400m walking distance level of service and that the uptake of medium density housing across the various suburbs in the MRZ should be

²⁹ *Ibid*, paragraph 148 – 149.

³⁰ [future-development-strategy-2024-web.pdf](#) – page 67.

³¹ Statement of Evidence of Harriet Fraser, dated 25 July 2025, paragraph 16(h).

monitored to determine when the additional reserves might be required (Section 8).

134. A number of submitters raised concerns about existing stormwater issues (SO30.1, SO42.1 SO63.1, SO65.1, SO79.4 and SO179.1). Concerns about existing stormwater issues are not, of themselves, a reason to exclude properties from the zone, for example Bodell Street and adjacent houses along Featherston Street. Ms Wood has responded to these submission in paragraphs 32 – 40 of her evidence. I rely on her conclusion, at paragraph 40, that she does not believe the Stormwater Overlay boundary should be altered. Issues with potential erosion of stopbanks are a matter for the regional council as these are a regional council asset.
135. SO80.1 seeks the removal of 158-170A Victoria Avenue from the MRZ, on the basis these properties are not within 800m of a neighbourhood centre. Mr Charnley notes that this property is within 800m of the Outer Business Zone, which includes neighbourhood amenities.³² I therefore recommend rejecting this relief.
136. Submissions requesting the inclusion of properties in the MRZ have been assessed against the accessibility criteria set out in Section 3.2.1 of the ADA.
- (a) 800m from land zoned as the city centre, a Large Neighbourhood Centre or the Roslyn neighbourhood centre;
 - (b) 400m from an open space reserve;
 - (c) 600m from a bus stop; and
 - (d) 800m from a primary or intermediate school.
137. SO22.1 seeks the extension of the zone boundary to include Anderson Street in Hokowhitu. This submission is supported by Kāinga Ora (FS06.02). While this property meets the accessibility criteria for a neighbourhood centre and primary/intermediate school, only part of the street is located 400m from the closest open space and it is located further than 600m of the closest bus stop with a frequent bus service. Accordingly, properties in Anderson Street do not

³² Statement of evidence of David Charnley, dated 25 July 2025, paragraph 20.

meet the Council's accessibility criteria. On this basis, I recommend this submission and FS06.02 is rejected.

138. Generally, it is appropriate to acknowledge that zone boundaries inevitably create distinctions between properties that may have similar characteristics. However, consistent application of the accessibility criteria is necessary in my view to ensure a defensible and coherent approach to zone extent, even where this results in some properties falling just outside the boundary.
139. SO95.1 seeks the inclusion of 29 Parata Street in the zone – this property is located on the corner of Parata and Anderson Streets. I have reviewed the submitter's assessment of the property against the Council's accessibility criteria and recommend it is rejected for the same reason as SO22.1
140. SO33.3's support for the plan change on the basis it will increase housing supply and choice and make better use of infrastructure is noted. The relief sought is a reduction in the MRZ extent to areas contiguous with The Square. I recommend this submission point is rejected, as such a reduction would not be consistent with the direction in Policy 5 of the NPS-UD. The ADA identified the zone extent that would appropriately give effect to this national direction.
141. SO60.1 seeks the inclusion of Drake Street (Awapuni) in the MRZ, on the basis that the low height restricts development. I assume this means the existing permitted activity height limit of 9m. Drake Street is already included in the notified MRZ (which has a permitted activity height standard of 11m), noting that it is subject to the proposed Stormwater Overlay. No change is required, and I therefore recommend accepting this submission.
142. The relief sought by SO66.1 is to allow medium density housing throughout the city, on the basis that market forces should determine where intensification occurs. I acknowledge the submitter's point about market forces. I considered the option of applying the MRZ to the entire city in the s 32 assessment, as Option 4. However, there are significant infrastructure capacity constraints across parts of the city (as demonstrated in the servicing assessments). I concluded that the requirements in the NPS-UD for development to be infrastructure-ready would not be met and as a result it would not be as efficient or effective as the proposed MRZ.

143. With regard to other points made by this submitter, residential intensification is not prevented outside the MRZ – there remains a consenting pathway for multi-unit housing in the Residential Zone. Further, the use of walkable distance accessibility metrics to determine the zone extent is consistent with MfE guidance about implementing the NPS-UD requirements and advice from McIndoe Urban Limited when preparing the plan change.
144. SO83.1 seeks the retention of Roslyn in the zone extent. As Roslyn is already included in the zone, and I am not proposing changes to the zone extent in this area, I recommend accepting this submission.
145. SO100.1 seeks the inclusion of 22 Haydon Street in the MRZ. While this property meets three out of four accessibility criteria, it is located approximately 925m from the closest primary/intermediate school – this is further than the 800m walkability metric. Accordingly, this property (and the rest of the southern side of Haydon Road) do not meet the Council's accessibility criteria and I recommend this submission is rejected. consistent application of all four accessibility criteria is necessary to maintain the integrity of the zoning approach.
146. SO106.1 seeks the inclusion of 525 Ruahine Street in the MRZ, on the basis it is immediately adjacent to the MRZ, and inclusion would result in a more harmonious integration between different housing typologies. A review of the Council's zone extent shows this property is not immediately adjacent to the MRZ and it is approximately 1,250m from the Hokowhitu neighbourhood centre – this is more than the 800m walkability metric.
147. SO164.1 seeks retention as notified and potential expansion to other areas such as Fitzherbert Avenue. The MRZ extent already includes properties on Fitzherbert Avenue, up to Marne Street on the eastern side of the street and Park Road on the western side. Properties to the south of these locations do not meet the Council's accessibility criteria and so no change is proposed. I therefore recommend accepting this submission in part, to the extent that the MRZ is retained as notified.
148. The inclusion of areas such as Hunter Street, Catlins Crescent, Kaituna and Clearview has been considered. These areas meet all accessibility criteria other

than the distance from a neighbourhood centre. I recommend rejecting SO149.2.

149. I disagree with SO169.1 that 68 Fitzroy Street is an island in the proposed zone extent. Mr Charnley considers this request at paragraph 21 of his evidence. I rely on his conclusion that the current boundary forms a logical edge for the zone and therefore recommend rejecting the relief sought.

150. I disagree with submitter SO207.1's reasons for including 567 and 567A Featherston Street in the MRZ. These properties do not meet all the Council's accessibility criteria – they are approximately 1,300m from a neighbourhood centre, which exceeds the Council's 800m walkability metric. Including these properties would be an outlier in the zone as they are also not contiguous – they are approximately 330m from the closest MRZ boundary to the west and 430m to the east.

K. ISSUE 3: SHOULD 17 SUMMERHAYS STREET AND THE HUIA STREET RESERVE BE REZONED TO MRZ?

151. There are four submission points on this issue. Annette Nixon (SO178.3) supports rezoning (noting that the PNCC Depot site on Albert Street is not proposed for rezoning as part of PC:1). David White (SO43.1), Fiona Wilson (SO187.3) and Gillian Rapson (SO214.2) oppose rezoning.

Response to submissions/recommendations

152. I acknowledge the opposing submitters' concerns about the need to retain reserves to support housing intensification. The Huia Street reserve and 17 Summerhays Street were previously used for an organised sport (bowls) which no longer occupy the sites. The reserves are surplus to the Council's requirements (as demonstrated through Council's public consultation process in 2021 and 2022^{33,34}) and there are no current or future reserves use identified for either property.

³³ [The future use of 17 Summerhays Street | Palmerston North City Council](#)

³⁴ [The future use of Huia Street Reserve | Palmerston North City Council](#)

153. The [Rezoning Report](#) provided as part of the evidence base for PC:I set out the public consultation undertaken by PNCC since 2019 for changing the use to medium density housing, including as part of the Future Development Strategy (FDS).
154. With regard to 17 Summerhays Street, in my opinion the resolutions passed by the Council on 7 April 2021 and the adoption of the FDS (which identifies this site as being for residential development) established the principle of residential development for the site has been established prior to notification of PC:I. Given that Council has already determined through a separate process that this site is appropriate for residential development public consultation and strategic planning processes, it would be inefficient to reach a different conclusion through PC:I without compelling reasons. The FDS represents considered strategic planning that should inform district plan provisions to ensure consistency across Council's planning framework.
155. I have the same opinion with regard to the Huia Street reserve. Converting part of the Huia Street reserve to residential was consulted on as part of preparing the FDS and the adopted FDS identifies Huia Street as being a housing growth location. Adopting a different approach in PC:I would create inconsistency between strategic planning documents and could undermine the integrated planning approach that is required here.
156. The [Parks Servicing Report](#), authored by Aaron Phillips, Council's Activity Manager - Parks and provided as part of the evidence base for PC:I, evaluated the existing parks capacity within the City's existing urban area in the context of proposed residential intensification. This report identified an increased demand on reserves as the number of people living within the catchment of each reserve increases, which submitters have also raised as a concern. However, the assessment did not recommend retention of either 17 Summerhays Street or the Huia Street reserve to meet this increased demand.
157. As Mr Phillips describes in his evidence, he concluded that a small neighbourhood reserve was required in the Terrace End/Hokowhitu to support residential intensification. He proposed this should be located at the Council's Albert Street Depot.³⁵ Mr Phillips is of the view that any public reserve

³⁵ Evidence of Aaron Phillips, dated 25 July 2025, paragraph 15.

development at 17 Summerhays Street would have poor visibility to the general public given the site location behind existing houses. If the Albert Street Depot redevelopment does not proceed, he considers an appropriate alternative is delivering a small reserve with strong frontage on to Summerhays Street.³⁶

158. With regard to the Huia Street reserve, I rely on Mr Phillips' evidence, at paragraph 26, that retaining this reserve would not address the gap in Hokowhitu and nor would its development cause any new reserves deficit.
159. The purpose of PC:I is to now change the zoning for both reserves to one that is enabling of residential development, to give effect to the Council resolutions and the FDS. I therefore recommend accepting S178.3 and rejecting SO43.1, SO187.3 and SO214.2.

L. ISSUE 4: WHETHER THE PROPOSED STORMWATER OVERLAY IS IN THE CORRECT LOCATION

160. There are seven submissions seeking either deletion of the overlay (Kāinga Ora – SO199.1) or amendments to the location and/or approach (Audrey Aird – SO67.1, Grant Binns – SO93.3, Murray Kidd – SO105.2, Brent Norrish – SO111.3, Shivarn Stewart – SO083.1 and Gillian Rapson – SO214.3).
161. The Kāinga Ora submission (SO199.1) suggests that the s 32 report includes a statement to the effect that the evidence and modelling associated with the overlay has not been completed. The submission does not provide a reference for this text, and I have been unable to find the relevant text myself. The modelling which underpins the proposed Stormwater Overlay was provided in the Stormwater Assessment, which formed part of the evidence base for PC:I – this was publicly notified at the same time as the s 32 report and the proposed provisions – it is therefore publicly available.
162. It is possible that Kāinga Ora is referring to the city-wide Stormwater Strategy – if so, this strategy is in preparation. However, its completion is not required in order to progress PC:I. The Stormwater Strategy is a strategic planning document that will guide future infrastructure investment and policy development. PC:I addresses immediate intensification requirements under the NPS-UD using the

³⁶ *Ibid*, paragraph 19.

best available information, while the Strategy will inform longer-term planning processes.

163. Ms Wood has reviewed the Stormwater Assessment and the modelling which underpins it. I rely on her opinion that this modelling provides an appropriate level of detail for PC:I and further modelling is not required at a city-wide level.³⁷ On this basis, I therefore disagree with Kāinga Ora that the Stormwater Overlay should be deleted. The mapping has been completed and review prior to its inclusion in the District Plan. I therefore recommend rejecting the relief sought in SO199.1.
164. I note that the Council has an obligation under section 6(h) of the RMA to manage significant risks from natural hazards, and the Stormwater Overlay is a key mechanism for giving effect to this direction.
165. The relief sought by the remaining submitters relates to matters outside the scope of PC:I. These stormwater-related concerns are addressed through other mechanisms, as Council regularly reviews its stormwater network to determine required updates, the city-wide Stormwater Strategy will assist with identifying strategic outcomes for stormwater, and the responsibility for opening flood gates rests with Horizons rather than Council.
166. I acknowledge Ms Rapson's concern about equitable costs. Ms Wood considers the approach in PC:I represents "*a balanced, pragmatic approach to manage future risk associated with intensification whilst enabling development*".³⁸ Relying on Ms Wood's evidence, in my opinion there should be no change to the proposed approach – the effects of or on a development from stormwater will depend on what is proposed at the time and the site-specific risk and the cost of mitigating those effects should fall on the developer.

M. ISSUE 5: WHETHER THE PROPOSED OBJECTIVES SET AN APPROPRIATE OUTCOMES FRAMEWORK FOR RESIDENTIAL INTENSIFICATION

167. There are 43 submissions and two further submissions on the proposed Chapter 10A objectives and six submissions and one further submission on the proposed Chapter 7B objectives. My analysis groups the submissions according to the

³⁷ Statement of evidence of Mary Wood, dated 25 July 2025, paragraphs 48-52.

³⁸ Statement of evidence of Mary Wood, dated 25 July 2025, paragraph 77.

relevant objectives for the MRZ and then the relevant objectives for subdivision in the MRZ.

Chapter 10A – MRZ objectives

MRZ-O1

168. The majority of submitters support the wording of MRZ-O1 as notified, including Mr Teo-Sherrell (SO184.1). However, he also seeks the deletion of “*and do not compromise the existing hierarchy of business zones within the city*” from MRZ-O1(b) (SO184.2). While I agree with his reasons for seeking a ‘car-light life’ I consider that retaining this wording actually supports that goal. Maintaining the business zone hierarchy helps concentrate services in accessible centres, and avoids the types of effects seen in Tauranga, where non-residential activities have been allowed to proliferate in highly accessible residential areas, such as in the Avenues and along Cameron Road. As a result, the traditional Tauranga CBD has been significantly undermined, the actual CBD could be argued to extend for at least two km along Cameron Road, and there are not the housing opportunities in close proximity to the CBD that there once were. Rather than support a car-light life, this pattern forces people into cars to access services and amenities. Accordingly, I do not support the relief sought by Mr Teo-Sherrell in SO184.2. I therefore recommend rejecting SO184.2 and accepting SO137.2, SO151.1, SO184.1, SO185.1, SO194.2, SO196.3 and SO199.5.

MRZ-O2

169. Of the 11 submissions to this objective, four seek that the objective is retained as notified. The remainder seek amendments. Objective MRZ-O2 describes the outcome of a predominantly residential MRZ to give effect to Objective 1 of the NPS-UD – that New Zealand has well-functioning urban environments and Policy 1 – that planning decisions contribute to well-functioning urban environments, and to One Plan OFD-O3 and OFD-P5.
170. Kāinga Ora (SO199.16) is seeking an extensive amendment to MRZ-O2, to remove matters (a)-(j) and simplify the objective. Mr Burns and I discussed these amendments at length. I agree with Mr Burns' analysis in paragraph 38 of this evidence and consequently recommend rejecting the majority of the relief sought in this submission point. I do agree with Kāinga Ora about deleting MRZ-

O2(d) as there is limited certainty about what “adaptable and healthy” might mean as an outcome. Accordingly, I recommend accepting in part SO199.16 insofar as it relates to that point.

171. While Mr Teo-Sherrell (SO184.5) seeks the replacement of ‘reasonable’ in MRZ-O2(e) with an alternative, he makes no alternative suggestion. I acknowledge concern that ‘reasonable’ can mean different things to different people, however the term ‘reasonable’ in this context is given specific meaning by the supporting policies and provisions. The examples he provided however, about footpath blockages, are not about amenity in my opinion but about safety and accessibility. I therefore recommend rejecting the relief sought.
172. On the other hand, I recommend accepting SO184.4 – I agree with Mr Teo-Sherrell that the meaning of “adaptable” is not clear in the context and I recommend the removal of text from MRZ-O2, consistent with my recommendation in response to SO199.16. I recommend accepting in part SO184.3 as I am recommending amendments to MRZ-O2 (g). I would note that “behavioural rules” for noise are already part of the ODP, in Section 6: General Rules. Vehicle use is not an RMA matter.
173. I disagree with the relief sought by MoE (SO196.4) and Enviro NZ (SO203.4) seeking to add references to additional infrastructure and waste storage and collection respectively to MRZ-O2(g). As I said in paragraph 75 of this report, MRZ-O2(g) is intended to refer to development infrastructure, which does not include additional infrastructure or waste storage and collection and I recommended amending this objective to only refer to development infrastructure (paragraph 70(b)).
174. I would note that the NPS-UD does not require that additional infrastructure is either adequate or funded. Clause 3.5 simply requires that PNCC is “satisfied that the additional infrastructure is likely to be available” at the time of the plan change, as does One Plan policy UFD-P4(1)(d). Further, I do not consider that change is required to signal that the MRZ is a suitable location for additional infrastructure, including schools. MoE is a requiring authority for educational facilities, and it is thus able to designate regardless of the zone and (consistent with the Residential Zone), MRZ-R12 provides for educational facilities as a

permitted activity. Accordingly, I recommend rejecting the relief sought by SO196.4 and SO203.4 and FS02.2.

175. Stephen Haslett (SO79.1) sought an amendment to MRZ-O2(i) but it is unclear from his submission what that should be. On that basis I have recommended rejecting this relief. Mr Haslett's concern about the lack of reference to floods in the plan change is addressed in paragraph 111 of this report.
176. Rangitāne (SO137.3) seeks amendments to the objective so it refers to supporting a reduction in greenhouse gas emissions as well as energy efficiency. I consider amendments are not required as point (f) of the objective already achieves the relief sought. Enabling mode shift is a mechanism for reducing greenhouse gas emissions and the zone extent has been determined based on walkability and access to public transport. This is consistent with the NZ Emission Reduction Plan (see Chapter 7). Horizons Regional Council also considers this objective as notified aligns with the RPS UFD-O5 (see S194.3). The Council's Climate Change Advisor, David Watson, does not support the inclusion of any additional provisions.³⁹ I therefore recommend rejecting SO137.3. I understand that following a pre-hearing meeting, Rangitāne is no longer pursuing this relief, but this will require confirmation.
177. Taking account of the above analysis, I therefore recommend accepting in part the submissions supporting the objective as notified. This is because I have recommended a change to MRZ-O2(d) and to MRZ-O2(g) as a consequential amendment in response to submissions on definitions from Mr Teo-Sherrell (SO184.8 and SO184.23), as set out in paragraph 90 of this report.
178. I recommend the following amendments:

MRZ-O2 Built development* in the Medium Density Residential Zone

Built *development** in the Medium Density Residential Zone positively contributes to achievement of a predominantly residential urban *environment* that:

- a. Comprises well-designed *buildings, sites, streets, and neighbourhoods*;
- b. Supports safe and secure environments that align with Crime Prevention through Environmental Design (CPTED) principles;
- c. Is characterised by an increased *building density, a mix of building typologies, and building heights* up to (and including) three storeys;
- ~~d. Is adaptable and healthy;~~

³⁹ Statement of Evidence of David Watson, dated 25 July 2025, paragraphs 13 – 19.

- e. Provides a reasonable level of amenity for residents, adjoining residential properties and the street;
- f. Enables mode shift to public transport and active transport modes;
- g. Integrates with existing and planned development infrastructure;
- h. Connects with open space and the natural environment;
- i. Is resilient to the effects of climate change and natural hazards; and
- j. Is energy efficient.

179. I consider these amendments are the most appropriate way to achieve the purpose of the RMA. They will assist plan users with interpreting the relevant plan provisions and they are consistent with higher order documents. There are no additional environmental, economic, social or cultural costs arising from the recommended change.

MRZ-O3

180. There are four submissions on this objective. Rangitāne (SO137.4), Phocus Planning (SO185.3) and Horizons (SO194.12) support the objective. Chris Teo-Sherrell (SO184.6) seeks the replacement of 'Manawatū Awa' with 'Manawatu River (Manawatū Awa)', on the basis that PC:l is "overwhelmingly written in English, text should be in English with any Māori language being used parenthetically and defined in Chapter 4 where it isn't a direct translation of the preceding English word".

181. Te reo Māori is one of two official languages in New Zealand – the other is New Zealand Sign Language. Under the Māori Language Act 2016 the Māori language is recognised as a language that is valued by New Zealand and the Government supports revitalisation of te reo Māori. Te Taura Whiri i Te Reo Māori (the Māori Language Commission) is responsible for coordinating the Maihi Karauna, which is focused on "creating conditions for te reo Māori to thrive and ensuring government systems support this".⁴⁰ The Government has adopted three goals to be achieved by 2040:

- (a) 85% of New Zealanders (or more) will value te reo Māori as a key part of national identity.

⁴⁰ [Māori Language Strategy - Te Taura Whiri i te Reo Māori](#) – accessed 12 June 2025

(b) 1 million New Zealanders (or more) will have the ability and confidence to talk about basic things in te reo Māori.

(c) 150,000 Māori aged 15 and over will use te reo Māori as much as English.

182. While the Council is not a central government agency, as a territorial authority it is part of the wider government system in New Zealand. The Council has an official partnership with Rangitāne o Manawatū,⁴¹ uses reo Māori in signage and other public spaces and promotes the use and appreciation of te reo Māori in everyday life. This includes the correct spelling of Manawatū and use of the kupu 'awa'. Awa is in common use in New Zealand, as part of an increasing number of Māori kupu forming part of the common lexicon in Aotearoa New Zealand, and part of the normalised, daily use in community and professional contexts. I consider therefore that the use of Manawatū Awa is a suitable inclusion into the objective and I recommend rejecting SO184.6 and accepting SO137.4, SO185.3 and SO194.12. Standard 14 – Definitions of the NPStds requires that reo Māori terms used in rules must be defined or translated into English in the Definitions chapter. This does not apply to kupu used in objectives or policies.

MRZ-O4

183. All submissions to MRZ-O4 either support the objective as notified or seek amendments. There are no submissions opposing the objective.

184. Chris Teo-Sherrell (SO184.7) and the Natural Hazards Commission Toka Tū Ake (NHC) (SO210.3) question what is meant by “*appropriately mitigated*” and request that this be defined – neither submitter provides suggested drafting although the NHC provided an example of assessment criteria. In my opinion the policies, rules and standards in the chapter already provide sufficient guidance on the meaning of the phrase “*appropriately mitigated*” in this context, for example:

(a) MRZ-P6 – sets the minimum requirements for all development in the zone in terms of adverse effects of flooding and stormwater;

⁴¹ [We partner with Rangitāne o Manawatū | Palmerston North City Council](#) – accessed 12 June 2025

- (b) MRZ-P7 – requires a stormwater management plan for any development in the Stormwater Overlay – the matters in this policy are the equivalent of the criteria identified in the NHC submission point;
- (c) MRZ-R7 – all permitted activity residential development needs to meet the permeable standard, stormwater attenuation and minimum floor level requirements, or else a Restricted Discretionary Activity (“**RDA**”) resource consent is required. If a resource consent is required, MRZ-P6 is explicitly one of the matters over which discretion is reserved;
- (d) MRZ-R8 – again, where development requires a resource consent, MRZ-P6 is one of the matters of discretion;
- (e) MRZ-R10 – a resource consent is required for all development in the Stormwater Overlay and the matters of discretion are reflective of the criteria the NHC has identified in its submission point;
- (f) MRZ-S9 – this is a requirement for a minimum permeable surface area. If this is not met, the matter of discretion is the effect of increased impervious surfaces on stormwater discharges and stormwater flows;
- (g) MRZ-S10 – a requirement for minimum volume of stormwater attenuation. If this is not met, the matters of discretion are the effect of reduced on-site attenuation and whether this is an acceptable alternative solution; and
- (h) MRZ-S11 – requirement for minimum floor levels. If this is not met, the matter of discretion is the effect on the site and on upstream and downstream properties of floor levels which are below the required standard.

185. In my opinion a definition is not required, and moreover, would be potentially duplicative of the above provisions. I recommend accepting in part SO184.7 and 201.3 insofar as I have provided more clarity in this s 42A report about what ‘appropriately mitigated’ means.

186. Mr Teo-Sherrell also sought the replacement of *“the on-site and off-site effects of flooding (including from stormwater) on people, property and the environment as a result of residential intensification are appropriately mitigated”*

with 'there is no net increase in stormwater yield or rate from a site compared with prior to intensification. This amendment would, in my opinion, limit the objective to stormwater-related outcomes only. I disagree with Stephen Haslett (SO79.2) that the objective as notified only refers to stormwater – however amending the wording as requested by Mr Teo-Sherrell would result in that outcome. Flooding in Palmerston North arises not just from overland stormwater flows, but from the various rivers and streams in the city.

187. Mr Teo-Sherrell makes a good point that the objective relates to residential intensification, rather than all development within the zone. As the stormwater management standards (MRZ-S9, S10 and S11) need to apply to both residential and non-residential development, I consider it appropriate that this is covered in the objective. I therefore recommend accepting SO184.7 insofar as it relates to this point.
188. Kāinga Ora (SO199.17) seeks amendments to MRZ-O4 to replace 'avoid' with 'ensure', on the basis that 'avoid' implies a prohibited activity status. I disagree. The objective uses 'avoid'... 'unless' rather than simply 'avoid'. This wording provides a clear pathway: effects should be avoided, but if they cannot be avoided, they must be appropriately mitigated. This is particularly important for a Restricted Discretionary Activity (RDA) status (as applies to development in the Stormwater Overlay) as it sets the scope of Council's discretion and provides grounds to refuse applications where effects are not appropriately mitigated.
189. On the basis of the above analysis, I recommend rejecting SO79.2 and SO199.17, accepting in part SO137.5, SO185.4 SO184.7, SO194.13 and SO210.3.
190. I recommend the following amendments to MRZ-O4:

MRZ-O4 Effects of flooding in the Medium Density Residential Zone

Avoid ~~residential intensification use and development~~* unless the on-site and off-site effects of flooding (including from stormwater) on people, property and the environment as a result of ~~residential intensification use and development~~* are appropriately mitigated.

191. I consider these amendments are the most appropriate way to achieve the purpose of the RMA. They will assist plan users with interpreting the relevant plan provisions and they are consistent with higher order documents. There are no

additional environmental, economic, social or cultural costs arising from the recommended change.

192. **MRZ-O5** – there are six submissions seeking retention of this objective as notified (SO107.1, SO137.6, SO185.5, SO194.14, SO194.18 and SO209.1) and two seeking amendments (SO184.8 and SO202.2). Kāinga Ora opposes SO202.2 (FS06.42).
193. I have already addressed the amendment sought by Mr Teo-Sherrell in SO194.8 (see paragraph 76 of this report) – my recommendation is accept in part.
194. The New Zealand Defence Force (NZDF) (SO202.2) seeks to amend MRZ-O5 so that effects of development on infrastructure and physical resources of regional or national significance are avoided. I have sympathy for the NZDF's position – there is an increasing tension between ongoing operation of existing regionally and/or nationally significant infrastructure and residential intensification and generally support the inclusion of controls in a district plan which manage the potential for reverse sensitivity issues and conflicts. However, I disagree with NZDF that Linton Army camp is located “*in the vicinity of proposed medium density residential zoning*” and therefore that a reverse sensitivity issue may arise.
195. There is nearly 1.6km between the closest edge of Linton Army camp and the boundary of the MRZ at Akaroa Avenue (See Figure 2). I do not consider this to be ‘in the vicinity of’. I consider MRZ-O5 as notified gives effect to the RPS (as confirmed by Horizons in SO194.18) and it provides appropriate protection against adverse reverse sensitivity effects. I therefore recommend rejecting SO202.2 and accepting FS06.42.
196. However, I note that Kāinga Ora's further submission incorrectly suggests the MRZ is not near infrastructure of regional or national importance. The MRZ is in the vicinity of the railway network and state highway network, both of which are infrastructure of regional/national importance. Significantly, KiwiRail did not submit on MRZ-O5's drafting, and NZTA supports the drafting as notified (SO209.1), indicating these infrastructure providers are satisfied with the objective's wording.
197. I recommend accepting in part the submissions supporting the drafting as notified. While I do not recommend amendments to MRZ-O5 in response to submissions on this objective, I do recommend changes as a consequential amendment in response to SO78.1 (see paragraphs 222 - 226).

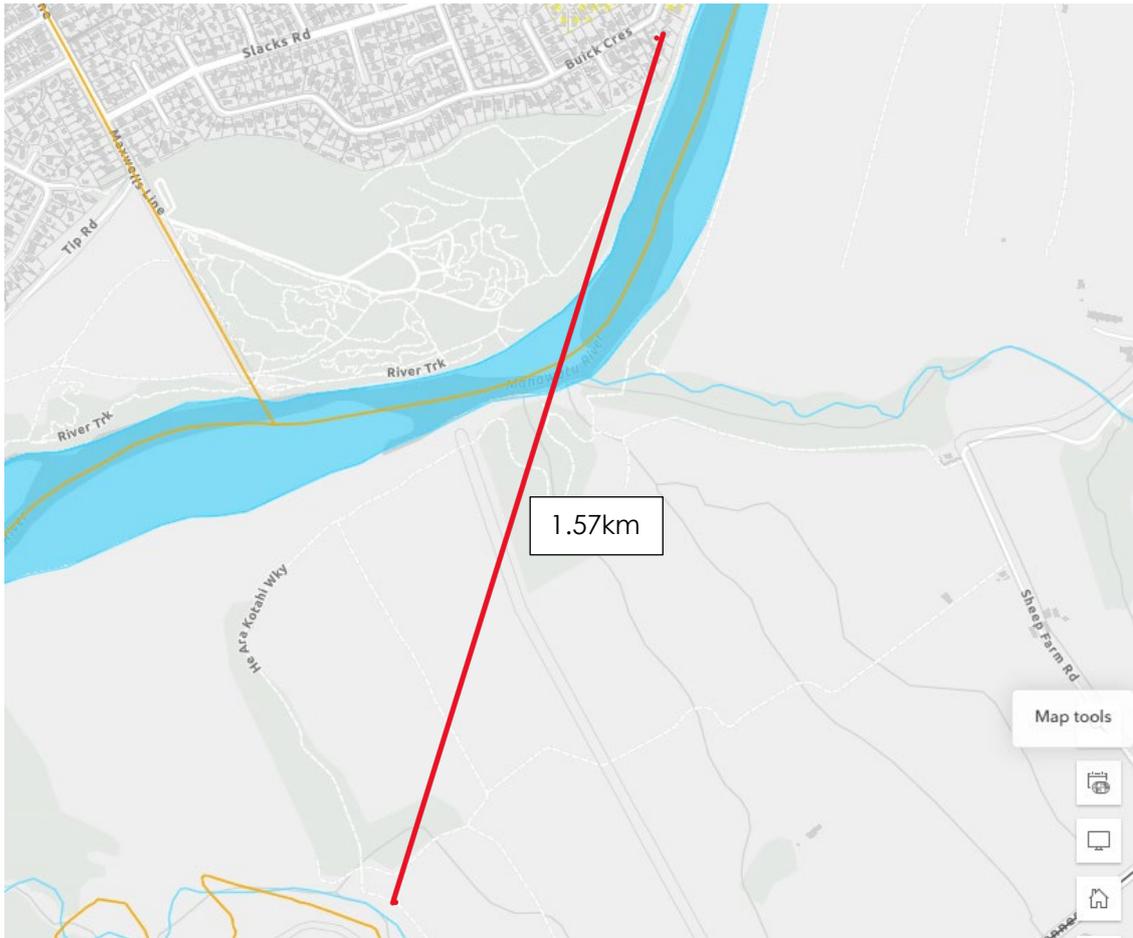


Figure 2: Distance between Linton Army Camp and MRZ boundary (source: extract from PNCC GIS, 11 April 2025)

MRZ-O6

198. There are four submissions supporting this objective (Rangitāne - SO137.7, Phocus Planning - SO185.6, Horizons - SO194.4 and Kāinga – Ora - SO199.18) and two seeking amendments (Chris Teo-Sherrell - SO184.9 and 184.10). I would note that position of SO137.7 was recorded as 'support in part' – I have confirmed this should be 'support'.
199. I disagree with Mr Teo-Sherrell's relief sought in SO184.9 that 'whenua Māori', 'tangata whenua' and 'whenua' should be replaced with English; reo Māori kupu should be included in parentheses; and that MRZ-O6 could give rise to conflict and undermine zone integrity.

200. While 'tangata whenua' is already a defined term in the ODP in my opinion this is unnecessary – tangata whenua are kupu that are part of the common lexicon in Aotearoa New Zealand. I consider there is no issue with the use of 'whenua Māori' as different types of land ownership is not a relevant factor for any rules in the chapter. I have discussed the appropriateness of using reo Māori in the district plan in paragraphs and of this evidence.
201. I do not agree that MRZ-O6 has the potential to cause conflict as I see no conflict between Māori cultural values and aspirations and the remainder of the plan – when intending to undertake activities controlled by Chapters 7B and 10A, Rangitāne would be required to comply with the relevant provisions in Chapters 7B and 10A just like anyone else. Further, the Council is required by s 74(1)(a) of the RMA to prepare and change the ODP in accordance with the provisions of Part 2 of the RMA, which includes the s 6(e) matter of national importance "*the relationship of Maori [sic] and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga*". Council has many other documents where Māori values are recognised, and this does not cause conflict. I therefore recommend rejecting SO184.9.

Chapter 7B – Subdivision in the MRZ objectives

SUB-MRZ-O1

202. There are six submission points regarding objective SUB-MRZ-O1. Of these, four support the objective as notified (SO137.36, SO194.23, SO194.27 and SO199.4), SO185.66 supports in part and SO210.15 proposes an amendment. Kāinga Ora (FS06.41) opposes SO185.66.
203. Phocus Planning (SO185.66) considers the objective needs to make it clear that the MRZ allows for other types of residential development besides medium density subdivision is appropriate in the MRZ. The purpose of the MRZ, as set out in the MRZ chapter, is to enable a variety of housing types and sizes (MRZ-01). There is no compulsion for any landowner to intensify and no minimum density requirement in either the objectives, policies or rules. I therefore do not consider it necessary to amend the SUB-MRZ-O1 drafting to achieve the relief sought by SO185.66. In my view, doing so would potentially misdirect the purpose of the zone. Accordingly, I recommend rejecting SO185.66 and accepting FS06.41.

204. The Natural Hazards Commission (NHC) (SO210.15) seeks inclusion of a definition and/or a metric to determine what natural hazard risk is deemed “significant” by the Council. In my opinion whether a natural hazard risk is significant will vary depending on a number of factors, including the type of hazard, area that may be affected and the scale of the effect. A consideration of risk also takes into account events of low probability but high consequence.
205. The primary natural hazard risks in the MRZ are associated with flooding and liquefaction after an earthquake. Flood risk has been addressed through introduction of the Stormwater Overlay and controls on development within that overlay (see SUB-MRZ-P4 and SUB-MRZ-R1A). In practice, an applicant for subdivision of land subject to the Stormwater Overlay will be subject to expert assessment in relation to that risk and this includes a consideration of the extent of flood hazard. The Council has a process for managing liquefaction risk, which the NHC has agreed via pre-hearing discussion is an appropriate way of managing this risk. This being the case I do not consider it necessary to have a definition or metric that defines the significant risk reference in SUB-MRZ-O1. I therefore recommend accepting in part SO210.15 insofar as the relief sought is already addressed, in my opinion, in the notified drafting.
206. As I am recommending SUB-MRZ-O1 is retained as notified, I recommend accepting SO137.36, SO194.23, SO194.27 and SO199.4.

N. ISSUE 6: WHETHER THE PROPOSED POLICIES SET AN APPROPRIATE FRAMEWORK FOR RESIDENTIAL INTENSIFICATION

207. There are 94 submissions and 11 further submissions on the notified Chapter 10A policies. There are 27 submissions and two further submissions on the notified Chapter 7B policies. My analysis groups the submissions according to the relevant policies for each chapter.

Chapter 10A – MRZ policies

MRZ-P1

208. There are seven submissions to this policy, all but one of which support the drafting and seek that it is retained as notified.⁴² SO191.1 and SO194.1 did not specify relief sought – since they are supporting the policy I assume they wish to retain the policy as notified. Kevin and Ngairé Smidt (SO116.1) oppose the policy on the grounds that the wording is too vague and it covers too much of the city. They are concerned about the effects of intensification and effects on quiet enjoyment.
209. The purpose of MRZ-P1 is to clearly signal to plan users the Council's expectations for how MRZ-O1 will be implemented. The planned built form of the zone is described in Policy MRZ-P3. This is not vague in my opinion – compatibility in planning terms means activities can co-exist without one undermining the primary purpose or character of the other. In this context, it means non-residential activities must not generate effects (such as traffic, noise, or visual impacts) that would compromise the residential environment the zone is designed to provide. For reference, the Pocket Oxford Dictionary definition of compatible is "*capable of co-existing or being true at the same time*".
210. The proposed rules and standards in the MRZ (and the ODP where relevant), set the acceptable effects envelope for permitted activities, and this includes in relation to noise and setbacks from adjacent properties. The types of non-residential activities signalled as being acceptable in the MRZ are the same as in the Residential Zone – an underlying principle of the plan change was to create a generally consistent approach between the MRZ and the residential zone as to how non-residential activities are treated so that neither zone is preferred or incentivised over the other. I consider that amendments are not required to MRZ-P1 as the issues raised by the Smidt's are either already addressed elsewhere in PC:I or they are not relevant in terms of the matters requiring evaluation here.
211. Based on the above analysis I recommend rejecting SO116.1 and accepting all submissions seeking to retain MRZ-P1 as notified.

⁴² **SO137.8**, Rangitāne; **SO184.11**, Chris Teo-Sherrell; **SP195.7**, Phocus Planning; **SO191.1**, Robert and Gill Norris; **SO194.5**, Horizons; **SO196.5**, MoE.

MRZ-P2

212. There are three submissions supporting MRZ-P2 as notified (Rangitāne – SO137.9, Phocus Planning – SO185.8 and Horizons – SO194.6). Kevin and Ngaire Smidt (SO116.2) and Robert and Gill Norris (SO191.2) oppose the policy, and two submitters seek amendments. Chris Teo-Sherrell (SO184.12) seeks amendments to more clearly limit the degree of non-compliance – although he does not provide suggested drafting. The Fuel Companies (SO78.1) seek the inclusion of “*and avoid reverse sensitivity effects on existing non-residential activities on adjoining sites*”. This is opposed by Kāinga Ora (FS06.6).
213. The purpose of MRZ-P2 is to provide the policy for residential activities and buildings that would require a resource consent. This includes one to three dwellings where one or more permitted activity (PA) standards are not met, and four or more dwellings. The policy signals that residential activities and buildings requiring a resource consent are likely to be acceptable if they are well-designed and compatible with the planned built form.
214. SO116.2 and SO191.2 appear to suggest that residential development should be prohibited if it doesn't meet permitted activity standards. I disagree. The resource consent process provides the mechanism to assess potential effects where these requirements and standards are not met, and the ability to decline a resource consent if appropriate. The policy wording references MRZ-P3, which describes the planned built form anticipated for the MRZ and this is what residential activities requiring a resource consent will be assessed against. I do not recommend any changes in response to SO116.2 and SO191.2 and hence recommend the submissions are rejected.
215. Mr Teo-Sherrell raises concerns about subjectivity in the phrase ‘well designed and compatible’. While some subjectivity is inherent in design assessment, Policy MRZ-P3 provides the planned built form framework that limits this subjectivity by establishing clear expectations for development. Without alternative drafting being proposed and given that MRZ-P3 provides sufficient guidance in my opinion, I recommend rejecting SO184.12.

216. The Fuel Companies (SO78.1) are seeking amendments to MRZ-P2 to include a reference to avoiding reverse sensitivity effects on non-residential activities, which Kāinga Ora opposes (FS06.06). The Fuel Companies are also requesting related amendments to MRZ-S3 and MRZ-S4, which I address in paragraphs 457 and 464 respectively.
217. I agree with SO78.1 that a reference to reverse sensitivity effects for non-residential activities is appropriate within PC:I, although I do not agree to the inclusion of the terminology 'avoid' in this context. The key issue is where such a reference should be located. As notified, the purpose of MRZ-P2 is to provide the policy for applications for residential land use activities and buildings - making it inappropriate for non-residential reverse sensitivity provisions as sought by this submitter. As notified, MRZ-O5, MRZ-P11 and MRZ-R18 – R20 are focused on reverse sensitivity effects on infrastructure. However, the definition of infrastructure in the RMA (and as proposed for inclusion in PC:I) does not include service stations and I do not consider it appropriate to extend the well-tested RMA definition in PC:I.
218. Following a pre-hearing meeting with The Fuel Companies, I consider that amending MRZ-P11 to include a reference to existing non-residential activities would appropriately achieve the relief sought in SO78.1, provided there is a reference to 'lawfully established'. I am therefore recommending that MRZ-P11 be broadened to cover all existing lawfully established non-residential activities, not just infrastructure. I considered whether a new policy was the most effective and/or efficient option but discounted this as infrastructure is a sub-set of 'existing lawfully established non-residential activities' and I do not want to create potential future interpretation issues for plan users about which policies apply in which circumstances.
219. This new aspect of Policy MRZ-P11 would be given effect to through an amendment to the matters of discretion in MRZ-S3 (see paragraph 447). A new rule is not required as the potential reverse sensitivity effects of concern (noise and lighting) are a function of the extent of any setback from the side or rear boundary, which is controlled via this standard. I understand that The Fuel Companies support the approach I am recommending in response to their submission.

220. I consider two consequential amendments are required to support this new policy:
- (a) Firstly, an amendment to MRZ-O5, to expand the scope to set the outcome for the new policy. I consider mirroring the proposed language in MRZ-P11 would be an appropriate addition, i.e. *“existing lawfully established non-residential activities”*; and
 - (b) Secondly, a new definition of ‘reverse sensitivity effects’. This would assist plan users to understand the scope of MRZ-O5 and MRZ-P11 and consideration of reverse sensitivity. The proposed definition is *“means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained”*. The definition is the same as in the Wellington City District Plan.
221. In my opinion these amendments are within the scope of The Fuel Companies’ original submission, and there are no natural justice issues, because:
- (a) The original submission included a reference to *“alternative relief that achieves the same outcomes”*. In my opinion my proposed drafting amendments are alternative relief which achieve the same outcomes;
 - (b) Inclusion of a new definition is a consequential amendment; and
 - (c) The inclusion of a reference to ‘lawfully established’ and removal of the reference to ‘avoid’ narrows and reduces the effect of the proposed change compared to the original submission.
222. I would note that the above amendments do not preclude the owners and/or operators of existing, lawfully established, non-residential activities from complying with the s 16 RMA duty to avoid unreasonable noise and the s 17 RMA duty to avoid, remedy or mitigate adverse effects. The proposed amendments do not licence unreasonable noise or other effects.
223. On the basis of the above analysis, I recommend accepting in part SO78.1. Kāinga Ora (FS06.6) opposes inclusion of ‘avoid’ policies and the amendment to MRZ-P2 as originally sought by SO78.1. I recommend accepting FS06.6 as my
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recommended response to SO78.1 does not involve amending MRZ-P2 and nor does it involve the use of 'avoid'.

224. Based on the above analysis I recommend accepting submissions SO137.9, SO185.8 and SO194.6 as I have not recommended amendments to MRZ-P2.

225. I recommend the following amendments as a result:

<p>MRZ-O5 Mitigate effects of development* adjacent to <u>infrastructure and existing lawfully established non-residential activities</u></p> <p>Mitigate the adverse effects, including reverse sensitivity effects, of subdivision, use and development* which is located adjacent to <u>infrastructure and existing lawfully established non-residential activities</u>.</p>	
<p>MRZ-P11 Effects on buildings and activities near infrastructure <u>and existing lawfully established non-residential activities</u></p> <p>Manage the effects on new or altered buildings and noise sensitive activities* near existing infrastructure <u>and lawfully established non-residential activities</u>, including by requiring:</p> <ol style="list-style-type: none"> 1. Appropriate setbacks and design controls where necessary to achieve appropriate protection of infrastructure and lawfully established non-residential activities and mitigation of effects on adjacent noise sensitive activities*. 2. All future buildings, earthworks and construction activities maintain safe electrical clearance distances in compliance with the New Zealand Electrical Code of Practice for electrical safe distances (NZECP 34:2001). 	
<p><u>Reverse Sensitivity Effects</u></p>	<p><u>means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained.</u></p>

226. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-P3

227. There are twelve submissions to Policy MRZ-P3. Three submissions oppose the policy – Kevin and Ngaire Smidt (SO116.3) and Robert and Gill Norris (SO191.3)

and Kāinga Ora (SO199.19). Kāinga Ora is seeking amendments rather than deletion of the policy. Rangitāne (SO137.10) and Horizons (SO194.7) seek retention of the policy as notified. PNCC (SO166.1), Chris Teo-Sherrell (SO184.13 and SO184.14), Phocus Planning (SO185.9) and Enviro NZ (SO203.5) seek various amendments. Kāinga Ora opposes SO116.3 (FS06.14) and SO166.1 (FS06.28).

228. SO116.3 and SO191.3 oppose MRZ-P3 because the policy does not provide guidance on appropriate levels of people density and vehicle numbers. However, the Council does not seek to control either the number of people living in a dwelling or the number of vehicles they own - these are not appropriate matters for regulation under the RMA. The RMA allows limitation of matters such as building footprint and envelope, and access design depending on the number of vehicle movements – but in my experience direct controls over occupancy or vehicle ownership limits are not related to adverse effects and appear to be more focused on social engineering.
229. In fact, I would be concerned that limitations on occupancy within private residences may be regarded as a potential breach of the New Zealand Bill of Rights Act 1990, such as the right of freedom of movement and residence.
230. In the existing Residential Zone, one might find a 3-4 bedroom house occupied by five or six people, all of whom have cars, and there are no limits on this in the ODP. In my experience it can be a common occurrence for a family of four to have four cars, especially if there are multiple teenagers or young adults still living at home who drive and own a car. I therefore recommend rejecting these submission points.
231. The amendments sought to MRZ-P3 vary significantly between submitters, requiring individual assessment in the following paragraphs, starting with the wholesale changes sought by SO199.19 to the policy. As with MRZ-O2, Mr Burns and I discussed the amendments sought by Kāinga Ora, and I agree with Mr Burns' analysis in paragraph 38 of this evidence that the changes sought by this submitter would undermine the policy intent. In addition, policies should provide guidance on 'how' objectives will be achieved rather than simply restating desired outcomes. For example, Kāinga Ora's proposed text "*well-designed buildings, sites, streets and neighbourhoods*" describes a desired outcome but does not explain how this will be achieved. In contrast, the notified MRZ-P3(1)

provides the 'how' by requiring that "*site layouts are coherently planned, and the layout responds to the characteristics of the site and context, including adjacent waterways and open space*".

232. I do not think that changing the policy wording as sought by Kāinga Ora will address concerns related to how resource consents will be evaluated where there are minor non-compliances – this would be driven by the extent of non-compliance and the activity status. For residential intensification with an RDA status, the matters of discretion would be limited to the standard that has been breached. Policy MRZ-P3 would apply to the extent relevant for the standard and the extent of non-compliance. Section 87BB of the RMA is also relevant, insofar as a minor non-compliance could be treated as a 'deemed permitted activity'. I therefore recommend rejecting the relief sought in SO199.19.
233. Turning to submitters seeking more targeted amendments to MRZ-P3, SO166.1 and SO203.5 seek the inclusion of a requirement for adequate rubbish and recycling collection and storage facilities – SO166.1 is opposed by FS06.28 on the grounds that MRZ-P3 is too detailed. I have been made aware by the Council's Resource Recovery team of issues with a lack of rubbish and recycling storage with existing more intensive residential development and I consider it appropriate that this matter is actively considered when the relevant standard (MRZ-S19) is not met. I therefore recommend accepting SO166.1 and accepting in part SO203.5 (insofar as I prefer PNCC's proposed drafting) and rejecting FS06.28.
234. Mr Teo-Sherrell (SO184.13) sought the use of less subjective words. He has provided an example and suggests replacing "... *good level of pedestrian access and amenity ...*" with "*access and amenity which is easy, comfortable and safe to find and use, and provides visual interest ...*" I acknowledge Mr Teo-Sherrell's concern about subjective language. However, I consider his proposed drafting would introduce equally subjective language such as 'easy', 'comfortable' and 'safe'. In my opinion 'good' is consistent with Policy 1(c) of the NPS-UD. How this would be interpreted comes down to the professional view of the planner, supported and informed by the application and any relevant technical assessments.

235. With regard to SO184.14, I rely on Mr Burns' evidence that a legible connection does not need to have a direct visual connection⁴³ and I recommend rejecting the relief sought.
236. I generally disagree with the relief sought by Phocus Planning (SO185.9) for the reasons set out in Mr Burns' evidence at paragraph 41. However, I do agree with the suggested inclusion of "a combination of" in (5) of the policy. I therefore recommend accepting in part SO185.9.
237. As I have recommended amendments to MRZ-P3, I recommend accepting in part SO137.10 and SO194.7.
238. I recommend the following amendments to MRZ-P3:

MRZ-P3 Planned built form

Residential *buildings* and *structures*, including *papakāinga**, are compatible with the planned built form of the Zone when:

1. *Site* layouts are coherently planned and the layout responds to the characteristics of the *site* and context, including adjacent waterways and *public open space**;
2. *Site* layouts provide a good level of pedestrian access and amenity and achieve legible, visually attractive *access** to the *development**;
3. Site layouts provide adequate rubbish recycling collection and storage facilities;
4. *Residential units* have appropriately sized and located private *outdoor living space* with a reasonable level of privacy and sunlight;
5. *Building* designs and *site* layouts provide a reasonable level of privacy and access to sunlight for *residential units* on the *site* and for those on neighbouring *sites*;
6. *Development** frontages provide a legible connection to the street through a combination of orientation, entrance location, fencing and glazing, and they are not dominated by garages;
7. *Developments** integrate landscaping with *building* and *access** design;
8. They provide visual interest through the modulation and articulation of *façades* and roof forms.

239. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan

⁴³ Statement of Evidence of Andrew Burns, dated 25 July 2025, paragraph 43

provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-P4

240. There is one submission opposing this policy (Grant Binns – SO93.2), four supporting (Kevin and Ngaire Smidt – SO116.4, Rangitāne – SO137.11, Robert and Gill Norris – SO191.4, and HNZ – SO194.8) and four submissions seeking amendments (Chris Teo-Sherrell – SO184.15, Phocus Planning – SO185.10, Kāinga Ora – SO199.20 and Enviro NZ – SO203.6).
241. Grant Binns is seeking a requirement for all multi-unit developments to have off-street parking. There is nothing preventing developers from providing off-street parking but the ability for councils to require off-street parking was removed when the NPS-UD was introduced in 2020. As a result, I recommend rejecting this submission.
242. I recommend accepting the relief sought in SO184.15, to include 'off-site' in the point (1) of the policy, as this makes explicit this requirement.
243. Council's traffic expert Ms Fraser considers that an amendment to MRZ-P4 is not required to include a reference to safe kerbside waste collection, as this is encompassed by "*safety and efficiency of the transport network*".⁴⁴ Relying on Ms Fraser's evidence I recommend rejecting the relief sought by SO203.6.
244. Ms Fraser disagrees with the relief sought by SO185.10 to replace 'is provided' with 'encourage'.⁴⁵ I agree with her rationale, that requiring cycling parking ensures there is some storage space available, and this is consistent with the overall commitment to encourage mode shift. I therefore recommend rejecting SO185.10.
245. I disagree with Kāinga Ora's request to relocate MRZ-P4 to the Land Transport Chapter, or to amend policies within that chapter to support MRZ development, because at present this policy only applies in the MRZ. This makes it appropriate to retain in Chapter 10. It may be that, as part the ongoing sectional ODP review,

⁴⁴ Statement of Evidence of Harriet Fraser, dated 25 July 2025, Table 1, row 3

⁴⁵ *Ibid.*

this policy could apply more broadly, in which case relocation may be appropriate at that point.

246. As I have recommended amendments to MRZ-P4 I recommend accepting in part submissions supporting the policy as notified.

247. I recommend the following amendments to MRZ-P4:

MRZ-P4 – Transport

Enable *residential activities and buildings* when:

1. The safety and efficiency of the land transport network is maintained, including by providing for safe on-site vehicle turning and manoeuvring where off-street parking is provided; and
2. On-site bicycle parking and storage is provided to support mode shift.

248. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-P5

249. There are five submissions seeking this policy is retained as notified (Rangitāne - SO137.10, Chris Teo-Sherrell – SO184.16 for points 1-5, Phocus Planning – SO185.11, Horizons – SO194.9 and MoE – SO196.6. Chris Teo-Sherrell (SO184.17) seeks deletion of point 6 of the policy. While Kevin and Ngaire Smidt (SO116.5) and Robert and Gill Norris (SO191.5) support the policy, they are also seeking that the blurring of residential and non-residential in Policy MRZ-P2 is avoided. Kāinga Ora (FS06.15) opposes in part SO116.5.

250. I recommend accepting all submissions seeking retention of the policy as notified. I recommend rejecting SO184.17 for the same reasons as set out in paragraph 140 of this report, in relation to MRZ-O1.

251. I recommend accepting in part SO116.5 and SO191.5, insofar as these submitters are supporting the policy. I do not consider there is a blurring of residential and non-residential for the same reasons as set out by Kāinga Ora in FS06.15, i.e. non-residential activities should be enabled where they support the needs of local

communities and are compatible in scale and intensity. Accordingly, I recommend accepting FS06.15.

MRZ-P6

252. All nine submissions either support as notified⁴⁶ or seek amendments.⁴⁷ Kāinga Ora (FS06.17) opposes in part SO137.13. There are no submissions seeking deletion.
253. Mary Wood (Council's Stormwater expert) and I discussed the relief sought by Rangitāne in a pre-hearing meeting with this submitter. Ms Wood and I agree in principle with the submission point but consider MRZ-P6 is not the right location to address the relief sought by Rangitāne as it is either already addressed by the notified MRZ-P7 or by proposed amendments to MRZ-P7. I understand Rangitāne agrees with this approach. As a result, I recommend accepting in part SO184.18 and rejecting FS06.17 as changes are not proposed to MRZ-P6.
254. Ms Wood has considered the relief sought by SO184.18 in paragraphs 54 - 57 of her evidence. Relying on her conclusions, I recommend rejecting the relief sought.
255. I recommend accepting in part SO116.6 and SO191.6 insofar as I consider the relief sought by these submitters is already achieved by the notified drafting – the requirement for a site-specific stormwater will include consideration of surrounding development at the time of the application, which would pick up changes in any development. I have addressed the question of maintenance in response to SO137.15, at paragraph 260.
256. SO79.3 sought amendments to this policy but has not identified any relief or any reasons. As a result, I recommend rejecting this submission.
257. I recommend accepting SO194.15, SO199.21 and SO210.4 as I recommend retaining MRS-P6 as notified.

⁴⁶ **SO185.12**, Phocus Planning; **SO194.15**, Horizons; **SO199.21**, Kāinga Ora; **SO210.4**, NHC.

⁴⁷ **SO79.3**, Stephen Haslett; **SO116.6**, Kevin and Ngaire Smidt; **SO137.13**, Rangitāne; **SO184.18**, Chris Teo-Sherrell; **SO191.6**, Robert and Gill Norris.

MRZ-P7

258. There are 10 submissions to this policy, of which Horizons (SO194.16) and the NHC (210.5) seek retention as notified. Robert and Gill Norris (SO191.7) oppose the policy without seeking any relief. The remaining submissions are seeking amendments.⁴⁸ Kāinga Ora (FS06.18) opposes the relief sought by SO137.14 and the relief sought by SO166.2 (FS06.29). Horizons (FS03.3) opposes the relief sought by Kāinga Ora (SO199.22).
259. Management of significant risk of natural hazards is a matter of national importance, under RMA s 6(g). The modelling underpinning the Stormwater Servicing Assessment shows the extent of the risk of flooding in Palmerston North from flooding – both riverine and from overland flows and this is the information which underpins the extent of the proposed overlay. I therefore disagree with SO68.1 that the requirement for a stormwater management plan in the Stormwater Overlay is “*unnecessary bureaucracy and red tape*” – it is required to manage the risk of flooding when intensifying and stormwater attenuation tanks alone may not provide sufficient capacity to mitigate this risk. I rely on Ms Wood’s evidence that the Stormwater Overlay is the primary mechanism for a systematic assessment of stormwater issues⁴⁹ and I therefore recommend rejecting this submission.
260. Ms Wood considered the relief sought by SO116.7 and SO191.7 in paragraph 61 of her evidence. Relying on her evidence, I recommend rejecting these submissions.
261. I support the clarification amendments sought by SO166.2 and therefore recommend accepting this submission and rejecting FO06.29. My recommendation on FS06.29 is consistent with my analysis and recommendation on SO199.1, at paragraphs 157 - 160 of this report.
262. Rangitāne (SO137.14) seeks a variety of amendments to MRZ-P7, including a reference to climate change, signalling a preference for nature-based solutions, direction about the reduction in post-development flows and ongoing maintenance of any mitigation measures. Following a helpful pre-hearing

⁴⁸ **SO68.1**, Finn Barnett; **SO116.7**, Kevin and Ngaire Smidt; **SO137.14**, Rangitāne; **SO166.2**, PNCC; **SO184.19**, Chris Teo-Sherrell; **SO185.13**, Phocus Planning; **SO199.22**, Kāinga Ora.

⁴⁹ Statement of evidence of Mary Wood, dated 25 July 2025, paragraph 60.

meeting with Rangitāne, I consider including a reference to climate change is appropriate. Mr Watson advises that the appropriate climate change scenario to reference is SSP5-8.5.⁵⁰ I also consider it appropriate to include a reference to how any recommended mitigation measures would be maintained, and a requirement to demonstrate how any on-site mitigation measures would support and align with the Stormwater Strategy.

263. I consider that a reference to nature-based solutions is not required, as MRZ-P8 already addresses this. This policy applies to development of more than four residential units (see MRZ-R8). I also consider a reference to pre- and post-development flows is not required as this is already addressed by Policy MRZ-P6, which requires that off-site stormwater peak flows following intensification are maintained to pre-development levels. This is primarily achieved by the requirement for stormwater attenuation for all residential intensification (see MRZ-S10). Taking account my analysis in the above paragraph, I recommend accepting in part SO137.14. I recommend rejecting SO184.19 as MRZ-P6 already references maintaining off-site stormwater flows to pre-development levels.
264. With regard to SO185.13, I agree that there should be a level of development permitted in the Stormwater Overlay without a resource consent. I disagree that MRZ-P7 is the right place to signal this. This is the role of rule MRZ-R10 in identifying what level of development in the Stormwater Overlay can occur without a resource consent, and therefore what level of development requires a resource consent. Accordingly, I recommend accepting in part SO185.13 insofar as it relates to the need for a level of permitted activity development.
265. As I am recommending amendments to this policy, I recommend accepting in part SO194.16. In doing so, in my opinion the amended policy continues to give effect to the RPS provisions identified by Horizons.
266. I recommend the following amendments to MRZ-P7:

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:**

⁵⁰ Statement of evidence of David Watson, dated 25 July 2025, paragraph 33.

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, including an allowance for climate change using climate change scenario SSP5-8.5;
3. Identifies the on-site and off-site *effects* of the proposed *development** on people, property and the *environment*;
4. recommends ed mitigation measures to remedy or mitigate the on- and off-site *effects* of the *development** and how these would be maintained; and
5. demonstrates that the on- and off-site *adverse effects* will be appropriately mitigated.
6. Demonstrates how any 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-wide Stormwater Strategy.

267. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-P8

268. There are three submissions seeking retention as notified (SO137.16, SO184.20 and SO194.17). Phocus Planning (SO185.14) seeks an amendment to the policy requiring water sensitive design in new subdivision and development, arguing that it should not apply to all development due to scale considerations.

269. My understanding of this submission is that it relates to the application of MRZ-P8 to the construction, alteration or addition of any building or structure within the Stormwater Overlay (Rule MRZ-R10). I have assessed submissions seeking redrafting of this rule, to address the unintended consequence that it captures all buildings and structures in the Overlay, no matter how small, in paragraph 392 of this report. In my opinion amendments to the rule, as I have proposed (influenced by advice from Mary Wood), will address the concern. Accordingly, I do not consider amendments are required to the policy. I therefore recommend accepting in part SO184.14 insofar as I have responded to the relief sought via changes to MRZ-R10 and accepting SO137.16, SO184.20 and SO194.17.

MRZ-P9

270. There are four submissions to this policy, from Rangitāne (SO137.17), Chris Teo-Sherrell (SO184.21), Phocus Planning (SO185.15) and Horizons (SO194.20). Kāinga Ora opposes in part SO137.17 (FS06.20).
271. Rangitāne seeks an amendment to the policy to signal that materials should be avoided in the first place or mitigated. Kāinga Ora considers this is already addressed in the plan change provisions. I have considered whether the presumption should be that copper and zinc are avoided in the first instance. However, in the absence of direction to that effect in the One Plan, I consider the requirements of Clause 3.5(4) of the NPS-FM are given effect to by the policy wording as notified.
272. Following pre-hearing engagement with Rangitāne, I have agreed that the policy wording would benefit from clarification, to be more explicit about what is meant by 'treatment'. This is supported by Ms Wood – she suggests replacing 'treatment' with "*surface treatment, to reduce contaminant generation*".⁵¹ Accordingly, I recommend accepting in part SO137.17 insofar as it relates to mitigation. As I have not included a reference to 'avoiding' these materials in the policy drafting, I recommend accepting FS06.20.
273. Chris Teo-Sherrell seeks the inclusion of "*and plastic*" after zinc, so the policy would apply to micro-plastics. I rely on the evidence of Ms Wood that there is not a sufficient body of evidence to support source control for microplastics⁵² and I therefore recommend rejecting the relief sought in SO184.21.
274. As I have recommended a minor amendment to MRZ-P9, I recommend accepting in part SO185.15 and SO194.20.
275. I recommend the following amendments to MRZ-P9:

MRZ-P9 Building materials

The *effects* on water quality of copper and zinc entering the *stormwater* system from use as roofing, guttering and building materials are mitigated through the use of appropriate surface treatment, to reduce contaminant generation.

⁵¹ Statement of evidence of Mary Wood, dated 25 July 2025, paragraph 77.

⁵² *Ibid*, paragraph 85.

276. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-P10

277. There are six submissions to this policy. Chris Teo-Sherrell (SO184.22), Phocus Planning (SO185.16) and Horizons (SO194.10 and SO194.21) seek retention as notified. Rangitāne (SO137.18) is seeking amendments, while Kāinga Ora (SO199.23) seeks deletion of the policy, which is opposed by Horizons RC (FS03.4).

278. Horizons considers this policy gives effect to a variety of relevant RPS provisions in the One Plan and consequently opposes deletion of the policy as sought by Kāinga Ora. Rangitāne is seeking policy expansion so that it directs energy efficient and climate resilient building forms, urban design and site layouts. At paragraph 19 of his evidence, Mr Watson considers that additional requirements to further reduce or eliminate emissions could deter residential intensification, which would undermine the purpose of the plan change. PC:I supports more climate-resilient communities by virtue of identifying a zone extent based on walkable catchments, to support the use of active and public transport. Water efficiency and waste minimisation, while important Council priorities, are addressed through other local authority functions rather than through RMA planning documents.

279. Kāinga Ora is correct that there are no specific rules or standards supporting this policy. The policy is referred to as a matter of discretion in MRZ-R16, and Horizons has requested that the policy is also referred to rules MRZ-R10 – MRZ-R15, to ensure those rules gives effect to the relevant One Plan provisions.⁵³ I have considered whether to incorporate the content of MRZ-P10 into MRZ-P3 – Planned built form. However, this policy does not apply to non-residential activities, and I consider the direction should apply across the zone. I agree with Horizons that the policy should also be referred to in rules MRZ-R7-MRZ-15, to be consistent with MRZ-R16. This creates a link between the policy and the supporting provisions, requiring energy efficient design and site layouts to be considered where a resource

⁵³ Submissions SO194.32 - SO194.40.

consent is required. In addition, Policy SUB-MRZ-P1 applies where subdivision is proposed, and this policy also requires that subdivision designs and layouts achieve development that, among other requirements, optimise solar gain and are adaptable to the effects of climate change.

280. On the basis of the above analysis, therefore, I do not recommend any changes to the policy as notified and recommend rejecting SO137.18 and SO199.23 and accepting SO184.22, SO185.16, SO184.10, SO194.21 and FS03.4.

MRZ-P11

281. There are eight submissions to this policy. Six submitters seek retention as notified.⁵⁴ Kāinga Ora (SO199.24) seeks the removal of the reference to the NZ Electrical Code of Practice for electrical safe distances (NZECP 34:2001) while the NZDF (SO202.3) seeks amendments to avoid effects on physical resources of regional or national importance and to protect such resources from reverse sensitivity effects. Kāinga Ora opposes these amendments (FS06.43).
282. With regard to SO202.3, I agree that the policy heading drafting could be clarified to make it clear this policy applies to the effects of buildings and activities on infrastructure, however I do not agree with the inclusion of a reference to “physical resources of regional or national importance”.
283. While I acknowledge that RPS Policy EIT-P1 identifies NZDF facilities as physical resources of regional or national importance that must be recognised, and that the District Plan must have regard to their benefits, I consider that NZDF facilities are already appropriately recognised within the broader district plan framework, including that Linton Military Camp is designated. Given the location and nature of the MRZ areas in relation to existing NZDF facilities and having regard to the anticipated effects of residential intensification, specific recognition within this policy is not warranted.
284. Horizons submission point SO194.19 supports MRZ-P11 as drafted as it aligns with RPS-EIT O1 and P2. I therefore recommend accepting in part SO202.3 insofar as it relates to the policy title, and FS06.43.

⁵⁴ **SO107.2**, Powerco Limited; **SO137.19**, Rangitāne; **SO184.23**, Chris Teo-Sherrell; **SO185.17**, Phocus Planning; **SO194.19**, Horizons; **SO209.2**, NZ Transport Agency Waka Kotahi (NZTA).

285. Kāinga Ora does not provide any reasons for its relief, other than the proposed MRZ policies should not restate NZECP standards. Schedule 1, Clause 30 to the RMA provides for the incorporation of “standards, requirements or recommended practices of international or national organisations” and “any other written material that deals with technical matters and is too large or impractical to included, or print as part of, the plan or proposed plan”. In my view the inclusion of a reference to the NZECP is appropriate, and not uncommon in other district plans.⁵⁵ This reference is also consistent with the policy direction in RPS EIT P2. In the absence of more detailed reasoning and given Sch 1, Cl 30, I recommend rejecting SO199.24.
286. Chris Teo-Sherrell supports MRZ-P11 and does not seek any amendments. However, he does observe that infrastructure is not defined in Chapter 4 [or Chapter 4A] and he seeks clarity about what infrastructure is covered in the policy. Mr Teo-Sherrell made similar submissions to MRZ-O2 (SO184.8), which I addressed in paragraph 90 of this report. I recommended the inclusion of a definition for infrastructure, which would also support interpretation of MRZ-P11.
287. As I propose amendments to MRZ-P11, I recommend accepting in part the submissions seeking retention of the policy as notified.
288. I recommend the following amendments to MRZ-P11:

MRZ-P11 Effects ~~on~~ of buildings and activities ~~near~~ on infrastructure
 Manage the effects ~~on~~ of new or altered buildings and noise sensitive activities* ~~near~~ on existing infrastructure, including by requiring:

1. Appropriate setbacks and design controls where necessary to achieve appropriate protection of infrastructure and mitigation of effects on adjacent noise sensitive activities*.

...

289. I consider that these amendments to be more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs.

⁵⁵ For example, Wellington City Council District Plan, Hutt City Proposed District Plan.

MRZ-P12

290. There are five submissions to this policy, only one of which seeks retention as notified (Phocus Planning – SO185.18). The remainder are seeking various amendments to make the policy either more or less restrictive. Mr Charnley has considered these various amendments at paragraphs 24 - 41 of his evidence and I rely on his conclusions when making my recommendations.
291. The signs, noise and earthworks general rules in Chapter 6 of the ODP apply in the MRZ (see the preamble to the rules) and this includes Rule R6.3.6.1, as amended by PC:I to also refer to the MRZ.⁵⁶ This rule permits earthworks that result in the disturbance of up to 500m² per site in any 12 month period and as a result all vegetation could be removed on a site being prepared for residential intensification. A requirement to retain and integrate existing vegetation, as sought by SO137.20, cannot therefore be achieved. It is for this reason that I disagree with Kāinga Ora that the policy “gives weight to the retention of vegetation” and that it “introduces pseudo-protected tree status”. The policy as drafted does neither. There is a considerable difference, in my experience, between encouraging an action and requiring an action.
292. Mr Charnley considers it would be appropriate to include references to the contribution any replacement vegetation may make to the matters identified in SO137.20. He also considers amending the policy to include a reference to indigenous biodiversity would be appropriate and that an improvement is required to the drafting of point (b), as raised by SO184.24.
293. On the basis of the above analysis, I therefore recommend accepting SO194.22 and accepting in part the remaining submissions and all further submissions to this policy.

⁵⁶ See [Plan Change I - Consequential Changes to the Palmerston North District Plan](#)

294. I recommend the following amendments to MRS-P12:

MRZ- P12 Vegetation and landscaping

Encourage the retention and incorporation of existing vegetation into the required landscaped areas where possible. Encourage replacement planting ~~to that~~:

- a. ~~Be~~ Is of equal or better quality in terms of species, form, scale and texture;
- b. ~~Use locally sourced species~~ Utilises indigenous species, including local sourced species, where practicable,
- c. ~~Contributes to managing stormwater, urban heat effects and increases biodiversity and vegetation cover~~

295. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-P13

296. There are six submission to this policy. Phocus Planning (SO185.19) and Horizons (SO194.11) seek retention as notified, while Kevin and Ngaire Smidt (SO116.8), Rangitāne (SO137.21), Chris Teo-Sherrell (SO184.25) and Robert and Gill Norris (SO191.8) seek amendments.

297. Beginning with the Rangitāne submission, this submitter is seeking a broadening of the policy to include reference to the design of public or community spaces, including with regard to access to the natural environment, use of materials, use of te reo Māori, design and mahi toi and accessibility. While I acknowledge the importance of these matters, I consider they are more appropriately addressed through Council's operational processes for parks design and development rather than through district plan policies.

298. I have discussed this request with Aaron Phillips, Council's Activities Manager – Parks. I understand that Rangitāne is already directly involved in the design of parks (and sometimes construction) where there is a particular interest for specific reasons, such as historic or cultural significance. Input on signage is sought on an ad hoc basis. Council also works with Rangitāne when developing parks plans. These existing mechanisms provide more flexible and comprehensive engagement opportunities than would be possible through

district plan provisions. Accordingly, I recommend accepting in part the relief sought, as while I am not recommending amendments to the policy, I understand the outcomes sought by Rangitāne are better achieved through the existing operational frameworks.

299. With regard to SO116.8 and SO191.8, no reason is provided for deleting the reference to papakāinga. Papakāinga is a residential land use, which is provided for in the MRZ (Rule MRZ-R1) and subject to the same controls as other residential buildings (Rules MRZ-R7 and MRZ-R8). As part of the current resource management system reform, the Government is proposing the introduction of a National Environmental Standard for Papakāinga which would apply across New Zealand, and which is proposed to enable up to 10 papakāinga on whenua Māori without a resource consent.
300. The matters of concern identified by these submitters in relation to marae are appropriately addressed, in my opinion, by Rule MRZ-R16, which requires a resource consent for establishment of a new marae as a restricted discretionary activity and sets out the relevant matters to which Council has restricted its discretion. I do not propose amending Policy MRZ-P11 in response to these submissions, and therefore I recommend they are rejected.
301. I have consulted with Rangitāne to inform my response to SO184.25. I rely on the advice of Mrs Siobhan Karaitiana that referencing Rangitāne o Manawatū, as in the notified policy wording, is most appropriate – a reference to hapū doesn't have local recognition or precedent and is without clear benefit. Rangitāne o Manawatū are mana whenua for Papaioea, as recognised in the 2019 partnership agreement between the iwi and the Council.⁵⁷
302. As I am not recommending any changes to the policy, I recommend accepting SO185.19 and SO194.11.

New policy

303. Rangitāne is seeking a new policy related to management of stormwater infrastructure (SO137.15). This new policy would require the Council to undertake a variety of actions within 12 months of the plan change becoming operative,

⁵⁷ [We partner with Rangitāne o Manawatū | Palmerston North City Council](#)

including developing and implementing a monitoring programme, and publishing information and guidance about permeable paving. This is opposed in part by Kāinga Ora (FS06.19). Ms Wood and I discussed this relief at a pre-hearing meeting with Rangitāne, and my understanding is we agreed that a new policy would not necessarily achieve the outcome sought by Rangitāne.

304. While I agree with the principle that stormwater infrastructure management is important, I do not consider a new district plan policy is the appropriate mechanism to achieve this. Ms Wood considers the relief sought by Rangitāne in paragraphs 42 – 46 of her evidence and I rely on her conclusion that the current Palmerston North Stormwater Bylaw already provides a legal basis for enforcement of operation and maintenance requirements for a private stormwater device by Council, if required. I note that Ms Wood supports Rangitāne's suggestion of guidance documents to support this aspect of implementing PC:I,⁵⁸ and I also endorse this.
305. I accept the principle and reasons given by Rangitāne in this submission point and accordingly I recommend accepting in part SO137.15. I am not, however, recommending that a new policy is required. I am not recommending a new policy, I recommend accepting FS06.19.

Chapter 7B – Subdivision in the MRZ policies

SUB-MRZ-P1

306. There are eight submissions to this policy. Five support SUB-MRZ-P1 as notified and three seek amendments. Horizons Regional Council (Horizons) (FS03.1) opposes SO199.5.
307. Rangitāne o Manawatū (SO137.37) seeks an amendment to sub point 8 so that it requires retaining and integrating mature vegetation. Rangitāne sought a similar amendment to policy MRZ-P12 in Chapter 10A (SO137.20), which I recommended was rejected. As discussed in paragraph 271 of this report, ODP Rule R6.3.6.1 permits earthworks up to 500m² and as a result all vegetation could be removed. A requirement to retain and integrate existing vegetation, as

⁵⁸ Statement of evidence of Mary Wood, dated 25 July 2025, paragraph 46.

sought by SO137.37, cannot therefore be achieved. Consistent with my recommendation on SO137.20, I therefore recommend rejecting SO137.37.

308. While Annette Nixon (SO178.1) supports retention of this policy as notified, she also noted:

(a) Whether optimise solar gain including encourage of solar power investment – the answer is no – any actions around encouraging solar power investment occur at central not local government.

(b) Achieving high quality landscape outcomes should include shade to mitigate heat effects – this is addressed through recommended amendments to MRZ-P12 and MRZ-S5

(c) Public gathering spaces should be with residential development and the neighbourhood – open space requirements to support residential intensification were considered by Mr Aaron Phillips in his [Parks Servicing Report](#).

309. Kāinga Ora (SO199.5) seeks a variety of amendments to the policy, which would result in the removal of text related to renewable energy, solar gain, water sensitive design, design using crime prevention through environmental design (CPTED) principles, landscape outcomes and lot orientation. The reason is that these are not general subdivision matters, there are no related rules or standards, and they could impact on future Kāinga Ora development outcomes.

310. SUB-MRZ-P1 sets the Council's expectations for subdivision in the MRZ. It is premised on the basis that subdivision may occur separately from and in advance of a land use activity.

311. I do not agree with the argument that subdivision 'is just lines on a plan' and has no effect. In my opinion a subdivision layout has the potential to influence significant aspects of a future land use development, and this includes whether a layout optimises solar gain and enables water sensitive design. I have already referred to the ODP rule that enables removal of all vegetation on a site, up to 500m². However, where this does not occur, a subdivision layout can respond to existing mature trees and vegetation. Finally, a subdivision layout can have a

material influence on lot front orientation and how CPTED principles are incorporated.

312. Removing the reference to renewable energy does not, in my opinion, give effect to Policy 1 (e) and (f). As noted by Horizons in FS03.1, making the changes sought by Kāinga Ora would result in the policy no longer giving effect to One Plan RPS policy UFS-P8.
313. An assessment of SUB-MRZ-P1 will be triggered when a subdivision will result in a non-compliance with a standard/s identified in SUB-MRZ-R1.1. These standards include MRZ-S1 – MRZ-S20 which include landscaping and urban design standards. In my view the notified policy serves two important functions: it provides guidance to decision makers exercising their discretions when making decisions on applications, and it establishes the assessment framework that applicants must address when seeking to depart from the relevant standards. Based on the above assessment, I recommend rejecting SO199.5 and accepting FS03.1.
314. Enviro NZ (SO203.10) seeks the addition of “*including safe waste kerbside collection*” to sub-point 4. Enviro NZ made a similar submission point⁵⁹ to MRZ-P3 within the Medium Density Zone chapter (see paragraph 216 of this report), which I recommended accepting in part as I preferred another submitter’s drafting. I consider safe kerbside waste collection is a land use matter rather than something to be considered during subdivision. As a result, I recommend rejecting SO203.10 as this matter would be addressed by the recommended amendment to MRZ-P3.
315. I have identified a minor correction required to SUB-MRZ-P1 – to include a title for the policy as this is missing from the notified version. As the focus of the policy is subdivision design and layout this is the recommended title.
316. As I am only recommending very minor amendments to SUB-MRZ-P1 in response to SO166.38 (see paragraph of this report), to give effect to the National Planning Standards, I recommend accepting SO178.1, SO185.67, SO194.24, SO194.28 and SO194.31.

⁵⁹ SO203.5.

317. I recommend the following amendments.

Policies	
SUB-MRZ-P1	<u>Subdivision design and layout</u>
Provide for subdivision designs and layouts that make efficient use of renewable energy and other natural and physical resources, and deliver well-connected, resilient communities, including development patterns that:	
1.	Optimise solar gain and manage solar access;
2.	Incorporate <i>water sensitive design</i> ;
3.	Manage stormwater effectively and efficiently;
4.	Support walking, cycling and public transport opportunities and enhance neighbourhood and network connectivity and safety,
5.	Result in safe and adequate access from the transport network to each allotment;
6.	Are adaptable to the effects of climate change;
7.	Are designed using crime prevention through environmental design principles;
8.	Achieve high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that contribute positively to an area's visual amenity; and
9.	Orient <u>allotment</u> to frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear <u>allotments</u> lots .

318. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MRZ-P2

319. There are four submissions on this policy, only one of which is seeking an amendment. The rest support retention as notified.

320. Kāinga Ora (SO199.6) does not support the first clause in the policy “*Encouraging joint applications for subdivision and land use*”. Kāinga Ora considers that clause 3 provides sufficient direction to ensure that when an allotment is developed, that a complying dwelling can be constructed. In my view the policy provides useful clarity on the Council's preference for co-ordinated/integrated assessment where subdivision and land use are clearly linked. The policy wording

does not require joint applications and hence I consider there is insufficient justification provided by the submitter to warrant its deletion. I would also note that s 91 of the RMA gives the Council the power to suspend processing of an application if other resource consents are required or applications for one or more consents (including a subdivision or land use consent) are required to enable a better understanding of the proposal. I therefore recommend that SO199.6 be rejected.

321. As I am not recommending amendments to SUB-MRZ-P1, I recommend accepting SO178.2, SO185.68 and SO194.25.

SUB-MRZ-P3

322. There are six submissions on this policy. Of these two support the policy as notified and four seek amendments.
323. The NHC (SO210.16) seeks further direction about what is meant by “*appropriately mitigated*” and that “*appropriate mitigation measures*” are assessed using criteria provided by the submitter. The NHC made a similar submission on Policy MRZ-O4,⁶⁰ which I assessed in paragraph of this report. In my opinion ‘appropriately mitigated’ is reflected in the policies, rules and standards in PC:I. Consistent with my recommendation on SO210.3 I consider SO210.16 should be accepted in part, insofar as I have provided more information about what ‘appropriately mitigated’ means.
324. PNCC (SO166.39), Phocus Planning (SO185.69) and Kāinga Ora (SO199.7) propose amendments for better drafting clarity. I have considered the submitter’s relief and agreed that amendments are required, although I prefer different drafting. I therefore recommending accepting in part these submissions. I recommend accepting SO194.29 as I consider the recommended amendments still give effect to the identified RPS objectives and policies and accepting in part SO.137.38 as I have recommended amendments to the notified provision.

⁶⁰ SO210.3.

325. I recommend the following amendments.

SUB-MRZ-P3 Subdivision of land affected by natural hazards

Take a risk-based approach to the subdivision of *land* affected by *natural hazards* so that:

- a. new ~~or exacerbation of existing~~ *natural hazards* and/or exacerbation of existing *natural hazards* is avoided where practicable and
- b. appropriate mitigation measures are implemented during subdivision and development* ~~to manage natural hazard risk are in place prior to development.~~

326. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MRZ-P4

327. There are six submissions to this policy. Five submissions seek amendments while one submitter opposes the policy as notified and seeks its deletion. This is opposed by FS03.2.

328. Rangitāne o Manawatū (SO137.39) seeks a variety of amendments to this policy, similar to the amendments sought to Policy MRZ-P7.⁶¹ I considered the relief sought to MRZ-P7 in paragraphs 252 - 253 of this report and concluded that much of the relief sought by this submitter was already included in other policies. As the relief sought relates to MRZ-SUB-P4, and to be consistent with MRZ-P7, I do recommend that a reference to climate change scenario SSP5-8.5 is included and a reference to water sensitive design when considering mitigation. I also recommend a new matter of discretion referencing the city-wide Stormwater Strategy, which Ms Wood supports.⁶²

329. PNCC (SO166.43) supports the policy subject to minor wording changes to provide clarity for plan implementation. Consistent with my recommendation on SO166.2, I recommend that this relief is accepted.

⁶¹ SO137.14.

⁶² Statement of evidence of Mary Wood, dated 25 July 2025, paragraph 74.

330. Phocus Planning (SO185.70) support the policy subject to deleting the words “*preferably with experience in water sensitive design*”. The reasons provided include that not all development will require water sensitive design (WSD) and it may not be possible on small infill sites. I agree that not all development will require water sensitive design. However, it takes experience to know whether there are opportunities for WSD and the notified does not require this experience – it merely states a preference. I therefore recommend rejecting this submission. I would note that the Council's [Engineering Standards for Land Development](#) include the same language where a stormwater management plan is required.⁶³
331. Consistent with their submission SO199.1, Kāinga Ora (SO199.8) opposes the policy as they are seeking deletion of the Stormwater Overlay and all related objectives and policies. I addressed the relief sought by SO199.1 in paragraphs 157 - 160 of this report, concluding that the Stormwater Overlay was an appropriate mechanism for managing risk with a suitable evidence basis. I disagree with the relief sought by SO199.8 to change the policy direction from ‘avoid, unless’ to ‘manage’, and deleting the requirements for the Stormwater Management Plan (SMP). Kāinga Ora's proposed amendments assume that the potential adverse effects of development within the Stormwater Overlay can always be mitigated and that is not going to be the case. Further, when subdivision occurs before land use, an expectation is established that future land use will be appropriate. I consider it critical that the policy sets a clear expectation that subdivision applications in the Stormwater Overlay will be declined unless the identified assessment is completed and the conclusions are acceptable.
332. I note Kāinga Ora's request that the policy should allow for a greater range of engineering consultants to prepare an SMP. I consider the notified drafting should remain as this is consistent with the language in Section 6.2.2 of the Council's Engineering Standards. I also disagree that a policy “*should be more high level*”. Policies describe how the outcomes in one or more objectives are achieved. While I acknowledge this policy is more detailed than others, this level of detail is appropriate given the potential extent of flooding effects.

⁶³ See Section 6.2.2.

333. Based on the above analysis, I therefore recommend rejecting SO199.8 and accepting FS03.2.
334. As I am recommending minor changes to the drafting, and I consider the policy as amended still gives effect to the relevant RPS policies in the One Plan, I recommend accepting SO194.30 and SO210.17.
335. I recommend the following amendments

SUB-MRZ-P4 – Subdivision in the Stormwater Overlay

Avoid *subdivision* 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**:

7. **identifies** the location, scale and nature of the *development* proposed for the *site*;
8. **identifies** the extent of flood and/or overland *stormwater* flow hazards, including an allowance for climate change using climate change scenario SSP5-8.5;
9. **identifies** the on-*site* and off-*site effects* of the proposed *subdivision* on people, property and the environment;
10. **recommends** mitigation measures to remedy or mitigate the on- and off-*site effects* of the *subdivision*; and
11. demonstrates that the on- and off-*site adverse effects* associated with *subdivision* will appropriately be mitigated.

336. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MRZ-P5

337. There are three submissions to this policy, all of which seek retention as notified. As amendment are not proposed, I recommend accepting SO185.71, SO194.26 and SO199.9.

O. ISSUE 7: WHETHER THE PROPOSED RULES ARE APPROPRIATELY DRAFTED TO MANAGE THE EFFECTS OF RESIDENTIAL INTENSIFICATION

338. There are 190 submissions and 13 further submissions on the proposed MRZ rules. There are 18 submissions and one further submission on the proposed MRZ subdivision rules. My analysis groups the submissions according to the relevant rules.

Chapter 10A – MRZ rules

MRZ-R1 – Enabling residential activities, including papakāinga

339. There are four submissions supporting this permitted activity rule and two opposing. Kevin and Ngaire Smidt (SO116.9) and Robert and Gill Norris (SO191.9) oppose the rule and they consider it needs to be more clearly defined. There is no further information provided, and they do not provide reasons. In my opinion the rule is clear, and amendments are not required. This rule gives effect to MRZ-O1 Purpose of the Medium Density Residential Zone, which includes enabling residential activities, including papakāinga. As a result, a resource consent is not required.

340. As I am not recommended any changes in response to submissions, I therefore recommend rejecting SO116.9 and SO191.9 and accepting the submissions seeking retention as notified, from Rangitāne (SO137.22), Leith Consulting (SO170.22), Chris Teo-Sherrell (SO184.26) and Phocus Planning (SO185.20).

MRZ-R2 – Home businesses (including home-based childcare)

341. There are two submissions supporting this rule as notified and eight seeking amendments.

342. As a starting principle, this rule controls home businesses in the same way as in the Residential Zone – home businesses are a permitted activity subject to compliance with standards.⁶⁴ However, the notified rule MRZ-R2 has some differences from the Residential Zone version of the rule:

⁶⁴ ODP Section 10 – Residential Zone – Rule 10.7.15

- (a) It refers to 'home business' rather than 'home occupation' to reflect the definitions in the NPStds, which Council is required to implement.
 - (b) It includes a maximum ratio and floor area, as there is no minimum lot or building footprint in the MRZ.
 - (c) It does not have a requirement to comply with R20.4.2 (parking) as this is not required for a home business.
343. From that starting point, there is variability among submissions seeking amendments, so I consider each submission point in turn in the following paragraphs.
344. Kevin and Ngaire Smidt (SO116.10) and Robert and Gill Norris (SO191.10) seek the inclusion of a requirement for on-site parking. Clause 3.38 of the NPS-UD prevents the Council from including a requirement for on-site parking – this includes for non-residential activities. Accordingly, I recommend rejecting the relief sought by these submitters.
345. Council as submitter (SO166.3 and SO166.4) seeks amendments to improve the clarity of drafting (MRZ-R2.1.c) and to remove an incorrect reference to assessment criteria (in MRZ-R2.2.1). I agree with the relief sought and therefore recommend that these submissions are accepted.
346. Chris Teo-Sherrell is seeking multiple amendments to MRZ-R2, raising concerns about noise from motor vehicle repairs (SO184.27-30) and dust nuisance provision (SO184.27). I agree there is merit in the view that the dust provision requires clarification.
347. In relation to concerns about dust nuisance provision, I agree that the current provision is too vague. However, rather than cross-referencing R10.7.1.5(c) as requested, I recommend defining 'dust nuisance' in Chapter 4A as visible particulate matter suspended across a boundary or traceable to an activity. This achieves the same clarity while maintaining plan consistency. I therefore recommend accepting SO184.27 in part.
348. With regard to SO184.28 and concerns about the maintenance and painting of residents' vehicles, MRZR2(1)(f) already refers to "of motor vehicles" so no change is required. The purpose of MRZ-R2 is to control home occupations – the
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rule would not apply to the repair and painting of personal vehicles, and this is the same situation as in the Residential Zone. The amendment sought by the submitter to remove the exclusion for residents' motor vehicles would change the purpose and function of the rule. I acknowledge there can be noise issues with residential activities and there are a variety of existing controls for noise, as set out in Chapter 6.2 of the ODP, along with a general duty in s 16 of the RMA to avoid unreasonable noise. Chapter 6 would apply to activities in the MRZ as stated in the preamble to the Rules section of proposed Chapter 10A. I therefore recommend rejecting SO184.28.

349. The Council's noise expert, Mr Syman, considers the relief sought by SO184.29 and SO184.30 at paragraphs 12 – 17 of his evidence. Relying on Mr Syman's conclusion that changes are not required to MRZ-R2 (at paragraph 17), I recommend rejecting the relief sought in these submission points.

350. Leith Consulting Limited (SO170.23) and Phocus Planning (SO185.21) seek to retain the rule as notified. Because I am recommending changes to Rule MRZ-R2 in response to the Council's submission, I recommend accepting SO170.23 and SO185.21 in part.

351. I recommend the following amendments

<p>Amend MRZ-R2.1 (c):</p> <p>...</p> <p>c. No more than 1 /3 of the <u>gross floor area of a</u> residential building, <u>including any accessory building or external storage area, (up to a maximum of 40m² and including gross floor area and external storage areas but</u> {excluding any car parking areas) <u>must can</u> be used for the home business;</p> <p>d. Activities do not create a <u>dust nuisance</u>;</p> <p>...</p>
<p>Amend MRZ-R2.2.1:</p> <p>...</p> <p>Council's discretion is restricted to:</p> <p>1. The extent and effects of non-compliance with any standard in MRZ-R2.1 which has not been met, <u>including any relevant assessment criteria for MRZ R2.1 (k) (m)</u>; and ...</p>

Include a new definition in Chapter 4A

Dust nuisance means the generation of dust resulting in visible evidence of suspended solids:

- (a) In the air beyond the site the dust is generated from; or
- (b) Traceable from a dust source settling on the ground, building or structure on a neighbouring site, or water.

352. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R3 - home-based childcare

353. There are seven submissions to this rule, all of which either support the rule as notified or seek amendments. Of the submissions seeking amendments:

- (a) PNCC (SO166.5) seeks the removal of an incorrect reference to assessment criteria in MRZ-R3.2.1. I recommend this relief is accepted, as there are no assessment criteria in the rules referred to in MRZ-R3.1.
- (b) Chris Teo-Sherrell (SO184.31) seeks a reduction in the noise levels in R10.8.1 as this rule does not adequately address noise from children. Changes to R10.8.1 are out of scope of PC:I. MRZ-R3 also limits the number of children to four, and the hours of operation to between 7am and 7pm Monday to Friday. Mr Syman considers this relief in paragraphs 12–17 of his evidence, and he concludes that changes are not required. I therefore consider these are appropriate controls on this activity, and therefore I recommend the relief sought is rejected.

354. The remaining submitters support the rule. As I am recommending an amendment in response to SO166.5, I recommend that SO116.11, SO170.24, SO185.22, SO185.23 and SO191.11 are accepted in part.

355. I recommend the following amendments

Amend MRZ-R3.2(1)

...

Council's* discretion is restricted to:

1. The extent and effects of non-compliance with any standard in MRZ-R3.1 which has not been met, ~~including any relevant assessment criteria for MRZ-R3.1 (c) and (d)~~; and ...

356. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R4 – conversion of an existing dwelling to a community house

357. There are seven submissions on this rule, two of which support the rule (SO170.25 and SO185.24) and the rest are seeking amendments:

- (a) Chris Teo-Sherrell (SO184.32 and SO184.33) seeks to include requirements for existing vehicle crossings to meet the requirement for a pedestrian visibility splay and for there to be 6.5m between the front boundary and a garage or carport. I recommend rejecting the relief sought in these submission points as the rule is focused on the conversion of an existing residential unit and it is unreasonable, in my opinion, to set standards which might require the alteration of an existing building footprint.
- (b) Kevin and Ngairé Smidt (SO116.12) and Robert and Gill Norris (SO191.12) seek a limit on the number of residents and cars. There is no limit in the ODP on the number of residents or cars (see Rule R10.7.1.1) and these submitters have not provided any evidence to support why a limit should be imposed in the MRZ. The requirement to have no more than three full-time equivalent people employed is a functional control that will naturally manage the number of residents, and the requirement to comply with the relevant parking and access requirements in ODP R20.4.2 will manage this aspect of any development. I therefore recommend rejecting the relief sought.
- (c) PNCC (SO166.6) seeks the removal of an incorrect reference to assessment criteria in MRZ-R4.2.1. I recommend this relief is accepted, as there are no assessment criteria in the rules referred to in MRZ-R4.1.

358. As I am recommended changes to MRZ-R4 in response to SO166.6, I recommend accepting in part SO170.25 and SO185.24.

359. I recommend the following amendments

Amend R4.2.1

...

Council's* discretion is restricted to:

1. The extent and effects of non-compliance with any standard in MRZ-R3.1 which has not been met, ~~including any relevant assessment criteria for MRZ-R4.1 (b) (e)~~; and ...

360. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R5 – Conversion of existing dwelling to a health facility

361. There are seven submissions to this rule, four of which support as notified and three of which are seeking amendments.

362. Karen Wilton (SO74.1) considers that lighting requirements should apply as well as requirements around hours of operation, and a requirement for consultation and consent if open outside standard office hours. MRZ-R5 is consistent with Rule R10.7.1.4 which provides for the reuse of a dwelling for a health facility subject to compliance with identified performance standards. There are some differences - MRZ-R5 requires that all external lighting complies with AS Standard 4282, which R10.7.1.4 does not. The controls on height and building coverage in R10.7.1.4 have not transferred to MRZ-R5 as this rule applies to an existing residential dwelling, which would have existing use rights for height and building coverage.

363. With regard to the relief relating to hours of operation, I consider health facilities may need to be open outside standard office hours to serve their community. The effects of this, such as parking requirements and noise, are already controlled by the limitation on the practice size and the requirement to comply with the residential noise limits in R10.8.1. As there are already lighting requirements in MRZ-R5 as notified, I recommend accepting in part the relief sought by Ms Wilson insofar as it relates to a requirement for lighting.

364. Chris Teo-Sherrell (SO184.34) seeks a requirement for any parking space between a garage/carport and the road to be at least 6.5m long. This requirement comes from MRZ-S3 and I therefore consider this submission alongside others to this standard, in paragraph 465(e). Relying on Ms Fraser's evidence.⁶⁵ I recommend that all submissions requesting more space between a garage and the property boundary are rejected.
365. PNCC (SO166.7) seeks a minor amendment to MRZ-R5.2.1 to remove the reference to an ODP rule which has no attached assessment criteria. I recommend accepting this relief.
366. As I am recommending changes to MRZ-R5 in response to SO166.7, I recommend accepting in part SO116.13, SO170.26, SO185.25 and SO191.13.
367. I recommend the following amendments

Amend R5.2.1

...

1. The extent and effects of non-compliance with any standard in MRZ-R5.1 which has not been met, including any relevant assessment criteria for MRZ-R5.1 (c) ~~(b)~~ ~~(f)~~; and

...

368. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R6 – Repair, demolition of removal of buildings and structures

369. There are four submissions to this rule, three of which support retention as notified. PNCC (SO166.8) seeks an amendment to exclude application of the rule to heritage buildings.

⁶⁵ Statement of Evidence of Harriet Fraser, dated 25 July 2025, Table 1, row 7.

370. MRZ-R6 enables the repair, demolition and removal of buildings and structures in the MRZ. As described in Section 4.1.1 of the s 32 report, the MRZ includes a number of buildings identified in the ODP as having heritage values, including five which are also identified as Category 2 buildings on Heritage New Zealand/Pouhere Taonga's Heritage List.
371. While the pre-amble to the Section 10A Rule section notes that Section 17: Cultural and natural heritage applies to the MRZ (Rule R17.8.1 makes the total or partial demolition of the exterior of any scheduled building or the destruction of any schedule objective, or the relocation of a Category 1 Scheduled Building or Object, a Discretionary Activity), there is a risk that this is missed by plan users. The addition of an advice note to MRZ-R6, that this rule does not apply to heritage buildings and structures, as requested by the Council, could help mitigate this risk. I therefore recommend accepting SO166.8.
372. As I am recommending changes to MRZ-R6 in response to SO166.8 I recommend accepting in part SO116.14, SO170.27 and SO191.14.
373. I recommend the following amendments

MRZ-R6 – Repair, *demolition or removal of buildings and structures**

1. Activity status: Permitted

Advice note: This rule does not apply to scheduled buildings, structures and objects controlled in accordance with Section 17: Cultural and natural heritage.

374. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R7 – Construction of up to three residential units and papakāinga

375. There are 27 submissions to this rule, of which nine oppose, 12 seek amendments and six seek retention as notified. I addressed SO114.2 in paragraph 49, as this is

a scope matter⁶⁶. I address SO129.1 in paragraph 430 as the relief sought relates to notification.

376. Starting with the submissions seeking amendments, several submitters sought a requirement for resource consents for less than three units/houses, more controls on papakāinga housing (such as limits on the number of residents or enhanced fire alarm and sprinkler systems), an increase in the number of units enabled without a resource consent to at least four and preferably six, and a link between the number of units and the site area.⁶⁷ I recommend rejecting all these submissions (and accepting FS06.14) for the following reasons:

(a) There is no difference, in my opinion, in effects between papakāinga and non-papakāinga housing – both are residential activities generating similar traffic, noise, and visual effects – and there is no planning rationale for different controls such as limits on the number of residents or fire alarms or sprinklers. The key difference between papakāinga and other housing is landownership structure, not the nature of the residential activity itself. This is not an environmental effect.

(b) The current framework allows up to three units as a permitted activity. Some submitters seek to increase this to 4-6 units, but pre-notification community engagement firmly opposed this expansion. Other submitters seek to reduce the threshold below three units, but this would undermine required intensification outcomes under the NPS-UD.

377. I recommend accepting SO166.9 – PNCC is seeking minor amendments to the rule drafting to correct a drafting error.

378. With regard to SO184.67 (request for pedestrian visibility splays for all development), elsewhere in this report, in response to submissions on MRZ-S20 – Fences and standalone walls,⁶⁸ I recommend relocating the requirement for a pedestrian visibility splay for vehicle accesses to MRZ-R16 – Vehicle Crossings. This is a more appropriate location for this requirement. I propose including a cross

⁶⁶ SO119.2 seeks protection for more old homes with heritage values.

⁶⁷ **SO31.2**, Gavin Casey; **SO88.3**, Pam Marks; **SO116.15**, Kevin and Ngaire Smidt (opposed by **FS06.14**, Kāinga Ora); **SO121.1**, Kevin Kelliher; **SO131.2**, Kathryn Hughes; **SO191.15**, Robert and Gill Norris.

⁶⁸ See paragraphs 576 - 582.

reference in MRZ-S20, so the requirement is not overlooked by plan users. As part of drafting amendments to MRZ-S16, in consultation with Ms Fraser I considered whether the ODP exemption for pedestrian visibility splays for three or fewer dwellings should still apply. Relying on her advice⁶⁹ I recommend removing the exemption which currently applies in the ODP, so that the pedestrian visibility splay will apply to any number of dwellings. As a result, I recommend accepting in part SO184.67 insofar as the relief sought relates to this requirement.

379. SO78.2 seeks retention of MRZ-R7.2(3) subject to the changes they sought to MRZ-P2. As set out in paragraphs 213 - 219 of this report I generally consider a reference to reverse sensitivity is appropriate, however this would be in MRZ-P11 rather than MRZ-P2. Accordingly, I recommend accepting in part SO78.2. I also recommend accepting in part FS06.7 insofar as I agree with Kāinga Ora that an avoid policy is not appropriate for managing reverse sensitivity effects. A consequential amendment is required to MRZ-R7.2(3) to include a reference to MRZ-P11 to give effect to the recommend amendment.
380. Horizons (SO194.32) is seeking the inclusion of a reference to MRZ-P10 (Energy Efficiency) into the matters of discretion for MRZ-R7.2, as is Rangitāne (SO137.23). I agree that this should be included in the matters of discretion as I consider it appropriate there is a link back to the relevant policy requirements in the event a resource consent is required. In the same submission point, Rangitāne is also seeking the inclusion of a reference to MRZ-P8 in MRZ-R7.2(3) matters of discretion. I agree with Rangitāne's reasons for inclusion that reference and therefore recommend accepting the relief sought.
381. With regard to submissions supporting the rule, Paul J Moughan (SO33.2), Leith Consulting (SO170.28, Phocus Planning (SO185.26) and Kāinga Ora (SO199.26) seek retention as notified. I recommend accepting in part these submissions as I have recommended minor amendments in response to SO166.9. I therefore recommend rejecting all submissions opposing MRZ-R7 for the same reasons as in paragraph 249(b).⁷⁰

⁶⁹ Statement of Evidence of Harriet Fraser, dated 25 July 2025, Table 1, row 6

⁷⁰ **SO129.2**, Roanne Hautapu; **SO156.2**, Andrew and Julie Phillips; **SO181.3**, Steve Allan; **SO187.2**, Fiona Wilson; **SO192.2**, Rex Voelkerling

382. I recommend accepting in part SO210.6 from the Natural Hazards Commission, as I have not accepted the NHC's relief sought to MRZ-S11 (see paragraph 523(c)).

383. I recommend the following amendments

2.	Activity status: Restricted Discretionary Where: a. There is a non-compliance with one or more of the standards of MRZ-R7-1. Council's* discretion is restricted to: 1. The matter(s) of discretion for any infringed standard in MRZ-R7.1(a); 2. The extent and effects of non-compliance with any standard in MRZ-R7.1(b) which has not been met, including any relevant assessment criteria ; and 3. The relevant matters in MRZ-P2, MRZ-P3, MRZ-P4, MRZ-P6, <u>MRZ-P8, MRZ-P10, MRZ-P11</u> and MRZ-P12. ...
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384. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R8 – construction of four or more residential units and papakāinga

385. There are ten submissions on this rule and three further submissions. Leith Consulting (SO170.29), Phocus Planning (SO185.27) and the NHC (SO210.7) support retaining the rule as notified. I recommend accepting this relief in part as I have recommended minor amendments to the rule in response to other submissions.

386. Kevin and Ngaire Smidt (SO116.16) and Robert and Gill Norris (SO191.16) oppose the rule and seek the imposition of additional requirements on papakāinga. I recommend rejecting these submissions for the same reasons as in paragraph 250(a).

387. I recommend accepting in part SO78.3 and FS06.8 for the same reasons as in paragraph 294 of this report. As with MRZ-R7, I consider a consequential amendment is required to MRZ-R8.1(1), to include MRZ-P11 as I have recommended amending MRZ-P11 rather than MRZ-P2.
388. I have discussed SO107.3 with Powerco Limited in a pre-hearing meeting. While I do not agree with Powerco's proposed drafting, I do accept that an additional matter of discretion would be appropriate for this rule to ensure that there is discretion in relation to the layout and design of services and connections to essential services (which includes electricity distribution infrastructure). I recommend the inclusion of the equivalent text to the matter of discretion for SUB-MRZ-S3 – this would ensure a consistent approach. Accordingly, I recommend accepting in part SO107.3. I recommend rejecting FS06.13 (which considers that the subdivision and infrastructure provisions appropriately addressed the relief sought by SO107.3) as residential intensification can occur as a permitted activity without a requirement for subdivision. Further, as I understand it, the engineering approval process is for infrastructure that would be vested in Council. The definition of essential services includes electrical power and telecommunications networks, which are not vested in Council.
389. I recommend accepting SO166.10 – PNCC is seeking minor amendments to include an additional matter of discretion and a reference to MRZ-P8 as a relevant matter of discretion. Rangitāne (SO137.24) is also seeking the inclusion of a reference to MRZ-P8 in MRZ-R7.2(3) matters of discretion. I agree with Rangitāne's reasons for inclusion of that reference and therefore recommend accepting in part the relief sought and rejecting FS06.22 (Kāinga Ora) insofar as it relates to the inclusion of a reference to MRZ-P8. This is consistent with my recommendations on MRZ-R7. I disagree with FS06.22 that MRZ-S10 adequately provides for onsite stormwater without amendment to this rule. MRZ-S10 relates solely to a requirement for stormwater attenuation – it does not give effect to the NPS-FW Clause 3.5(4) requirement for PNCC to include methods to promote positive effects, and avoid, remedy or mitigation adverse effects of urban development. MRZ-P8 gives effect to this requirement, and I consider it appropriate that water sensitive design methods are considered for larger residential intensification developments of four or more dwellings.

390. Horizons (SO194.33) is seeking the inclusion of a reference to MRZ-P10 (Energy Efficiency) into the matters of discretion for MRZ-R8.2, as is Rangitāne (SO137.24). Kāinga Ora opposes in part (FS06.22), Consistent with my recommendation for MRZ-R7 I recommend accepting SO194.33 and SO137.24 and rejecting FS06.22. While I agree with FS06.22 that there are no standards or performance measures, I do not agree that energy efficiency is an un-measurable concept. BRANZ provides a calculation tool for this purpose.⁷¹ PC:I deliberately avoids setting a particular energy efficiency outcome for housing, as this is already addressed by the Building Code. However, it is appropriate in my view to be encourage energy efficient site layouts – this is also consistent with the policy direction in Chapter 7B – Subdivision in the MRZ.
391. As I am proposing amendments to MRZ-R8 in response to other submissions, I recommend accepting in part SO170.29, SO185.27 and SO210.7.
392. I recommend the following amendments

1. Activity status: **Restricted Discretionary**
 Council's* discretion is restricted to:

1. The extent and effects of non-compliance with standards MRZ-S1 – S20;
2. The relevant matters in MRZ-P2, MRZ-P3, MRZ-P4, MRZ-P6, MRZ-P8, MRZ-P10, MRZ-P11 and MRZ-P12; and
3. The layout and design of services and service connections to essential services.

Notification:
 An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

393. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R9 – addition or alteration of buildings and structures

394. There are nine submissions on this rule. Two submitters oppose this rule on the ground additions or alterations should not be automatically allowed (Kevin and

⁷¹ [H1 Calculation method tool | BRANZ](#)

Ngairé Smidt - SO116.17 and Robert and Gill Norris - SO191.17). There are four submissions seeking amendments (PNCC - SO166.11, Chris Teo-Sherrell - SO184.69, Phocus Planning - SO185.28 and Horizons - SO194.34) and three supporting the rule (Rangitāne - SO137.25, Leith Consulting - SO170.30 and NHC - SO210.8). I have confirmed with Rangitāne that they support this rule in full. NHC's support is subject to amendments they have sought to MRZ-S11 – I address those in paragraphs 509 - 511 of this report.

395. I recommend accepting the amendments sought by the Council (SO166.11), as these will correct a drafting error in the rule.
396. I agree with SO185.28 that the rule as notified is overly restrictive. The current drafting would require a resource consent for any addition or alteration, and that is not how the rule is intended to function. This submitter does not provide any suggested amendments to resolve the relief sought, however. I have considered whether the rule should be amended to enable additions or alterations up to a certain gross floor area or whether the focus of the rule should be on the building envelope and coverage. I have also investigated other councils have approached this issue.
397. In my opinion the focus should be on the building envelope, coverage and managing stormwater. Enabling alterations and additions up to a specified gross floor area could result in encroachments into the standards that have been established to create the acceptable building envelope for permitted activities.
398. The question is whether the 'right' standards apply to this rule. I have reviewed these and consider the standards applying to additions and alterations could be reduced to those focused on height (including HIRB), setbacks, building coverage, landscaped areas, outdoor living space, outlook space, permeable surfaces, stormwater attenuation devices, minimum floor levels and front façade glazing – this is a consistent approach with other councils, including Wellington City Council and Kāpiti Coast District Council. I also propose inclusion of "*where the addition or alteration triggers one or more of the following standards*".
399. I have also proposed excluding additions and alterations to accessory buildings from the rule, as MRZ-R11 already applies to this activity. Given the uncertainty about the scale of a potential alteration or addition, requiring compliance with

this reduced list of standards is appropriate to avoid the situation where such development could result in adverse effects on neighbouring properties that would not be permitted for new residential units. I therefore recommend accepting SO185.28. Once amended, it will be possible to make minor additions or alterations to a building or structure provided there is the space on site.

400. As I have proposed amendments to MRZ-R9 I recommend accepting in part SO137.25, SO170.30 and SO210.8. I recommend rejecting SO116.17 and SO191.17 as it is appropriate to enable some additions and alterations as permitted activity - the recommended reduced suite of standards would focus on those matters most likely to result in a reduction in a neighbour's amenity, height increased building height, loss of daylight, distance of a building from a property boundary etc.
401. Horizons (SO194.34) is seeking the inclusion of a reference to MRZ-P10 (Energy Efficiency) into the matters of discretion for MRZ-R9.2. Consistent with my recommendation for MRZ-R7 and MRZ-R8, I recommend accepting the relief sought.
402. As I have proposed amendments to the rule in response to other submitters, I recommend accepting in part SO137.25 and SO210.8.
403. I recommend the following amendments:

MRZ-R9 - Addition or alteration of buildings and structures <u>(excluding accessory buildings)</u>	
1.	Activity status: Permitted Where: a. Compliance with the following standards is achieved <u>where the addition or alteration triggers one or more of the following standards:</u> <ul style="list-style-type: none"> i. MRZ-S1 – Maximum building height ii. MRZ-S2 – Height in relation to boundary iii. MRZ-S3 – Setbacks iv. MRZ-S4 – Building coverage v. MRZ-S5 – Landscaped areas vi. MRZ-S6 – Shade vii. MRZ-S7 – Outdoor living space viii. MRZ-S8 – Outlook space ix. MRZ-S9 – Permeable surfaces* x. MRZ-S10 – Stormwater attenuation device

- xi. MRZ-S11 – Minimum floor levels
- xii. MRZ-S12 – Front façade glazing
- ~~xiii. MRZ-S13 – Front door orientation~~
- ~~xiv. MRZ-S14 – Garages~~
- ~~xv. MRZ-S15 – On-site carparking~~
- ~~xvi. MRZ-S16 – Vehicle crossings~~
- ~~xvii. MRZ-S17 – On-site vehicle manoeuvring~~
- ~~xviii. MRZ-S18 – On-site bicycle parking~~
- ~~xix. MRZ-S19 – On-site rubbish storage and collection~~
- ~~xx. MRZ-S20 – Fences and standalone walls; and~~
- ~~b. Parking and access* comply with the following standards in Rule 20.4.2~~
 - ~~i. R20.4.2(a)(ii)~~
 - ~~ii. R20.4.2(a)(vi)b, d) - j)~~
 - ~~iii. R20.4.2(a)(vii), (ix) and (xii)~~
 - ~~iv. R20.4.2(a)(viii) – if on-site parking is provided~~
 - ~~v. R20.4.2 (d) and~~
 - ~~vi. R20.4.2(f).~~

2. Activity status: **Restricted Discretionary**

Where:

a. There is a non-compliance with one or more of the standards in MRZ-R9.1. Council's* discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-R9.1(a);
2. The extent and effects of non-compliance with any standard in MRZ-R9.1(b) which has not been met, ~~including the relevant assessment criteria~~; and
3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P6, MRZ-P10 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

404. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R10 – construction, alteration or additions in the Stormwater Overlay

405. There are 12 submissions to this rule. Kevin and Ngaire Smidt (SO116.18), Phocus Planning (SO185.29) (supported by FS01.11), Robert and Gill Norris (SO191.18) and Kāinga Ora (SO199.27) oppose the rule although only SO199.27 seeks its deletion. Rangitāne (SO137.26), PNCC (SO166.12), Chris Teo-Sherrell (SO184.70), Horizons

RC (SO194.35 and SO194.41) seek amendments, while Leith Consulting (SO170.31) and the NHC (SO210.9) seek retention as notified.

406. As there is significant variability between the amendments sought by the submitters I will address each submission in turn. Ms Wood also considers these points in paragraphs 76 - 79 of her evidence. Her conclusions inform my responses.
407. I have discussed the relief sought by SO185.29, to amend the rule to enable a level of development within the Stormwater Overlay without a resource consent, with Ms Wood. I rely on Ms Wood's conclusion that there is a degree of development that could occur in the Stormwater Overlay as a permitted activity, provided this does not exceed a threshold of 30m².⁷² I therefore recommend accepting SO185.29 and FS01.11. In doing so, it is important that this threshold is calculated cumulatively (to all development combined over time) to ensure that the purpose of the Stormwater Overlay, and the requirement to assess the effects of residential intensification, is not undermined.
408. SO116.18 and SO191.18 argue that mitigation will be insufficient to address stormwater management issues. As this rule requires a resource consent for any construction, alteration or addition in the Stormwater Overlay greater than a combined threshold of 30m² as proposed above, and any proposed mitigation will be entirely dependent on the proposed development details, I consider the rule is appropriately drafted and further amendments are not required. This approach is supported by Ms Wood. I therefore recommend rejecting these submissions.
409. As part of pre-hearing discussions with Rangitāne, I understand that Rangitāne agrees that a new matter of discretion is not required in response to their submission point, as the relief sought is already encompassed in matter of discretion 1. I agree with the proposed amendment to matter of discretion 3, as this amendment is consistent with the drafting in MRZ-P7. I also agree with the inclusion of an Advice Note. Referencing a consent notice here is not appropriate in my opinion, as these only apply to subdivision consents. However, Ms Wood and I consider it would be appropriate to reference the Council's

⁷² Statement of evidence of Mary Wood, dated 25 July 2025, paragraph 78

Stormwater Bylaw in an advice note. I therefore recommend accepting in part the relief sought in SO137.26.

410. I recommend accepting SO166.12 as the reference to MRZ-P8 is not relevant for this activity. Water sensitive design is relevant for development controlled under rules MRZ-R7 and MRZ-R8.
411. With regard to SO194.35, Horizons considers that, as notified, MRZ-R8 does not give effect to One Plan provisions RPS-UFD-O5 and P8 and EIT-O2 and P5 because there is no reference to MRZ-P10. The wording of these RPS objectives and policies is included in **Appendix 6** of this report, alongside an assessment of how PC:I gives effect to the relevant RPS provisions.
412. The Stormwater Overlay gives effect to UFD-O5. MRZ-R10 itself has an RD activity status which is focused solely on the effects of development within the Overlay. In my opinion, including additional references to MRZ-P3 (Planned built form), MRZ-P4 (Transport), MRZ-P10 (Energy efficiency) and MRZ-P12 (Vegetation) as sought by SO194.41, would significantly broaden the assessment scope. With so many matters of discretion, the rule would effectively become a discretionary activity. This would also duplicate the assessments required in MRZ-R7 – PA to construct up to three dwellings and MRZ-R8 – RDA to construct four or more dwellings.
413. I do not agree that MRZ-R10 as notified fails to give effect to RPS-UFD-P8 – this policy requires that PNCC's controls must encourage energy-efficient house design and access to solar energy, which is achieved through the application of the relevant policies to MRZ-R7 and MRZ-R8, if or when a resource consent is required. I also do not agree that MRZ-R10 fails give effect to RPS-EIT-O2 and EIT-P5, as those provisions are addressing unrelated matters and are not, in my opinion, relevant to consideration of development within a hazard overlay. The objective requires an improvement in the efficient of the end use of energy and an increase in the use of renewable energy, while policy EIT-P5 is focused on the efficient end use of energy for large energy users. I recommend rejecting the relief sought in SO194.35.

414. I agree with SO194.41 that a reference to 'stormwater' should be included in matter of discretion 1, as the matters of discretion should be clearly restricted to the effects that are the focus of the rule, i.e. stormwater. I therefore recommend accepting in part SO194.41.
415. SO199.27 seeks deletion of all provisions relating to the Overlay until such time as there is more fulsome evidence. This is a consistent theme throughout the Kāinga Ora submission, and I addressed the primary submission (SO199.1) in paragraphs 153 - 155, concluding the relief should be rejected. I therefore recommend rejecting the relief sought in SO199.27.
416. As I am recommending amendments to MRZ-R10, I recommend accepting in part SO170.31, SO202.1 and SO210.9.
417. I recommend the following amendments

MRZ-R10 – Construction, alteration or addition of B buildings and structures within the Stormwater Overlay	
1.	<p><u>Activity status: Permitted Activity</u></p> <p><u>Where:</u></p> <p>a. <u>The construction of new buildings and structures; and</u></p> <p>b. <u>The alteration or addition of any buildings and structures.</u></p> <p><u>does not increase the building coverage by more than a cumulative total of 30m² as measured from the date of [date the plan was made operative].</u></p>
+2.	<p>Activity status: Restricted Discretionary</p> <p><u>Where:</u></p> <p>a. <u>There is a non-compliance with MRZ-R10.1.</u></p> <p>Council's* discretion is restricted to:</p> <ol style="list-style-type: none"> 1. The extent to which any <u>stormwater-related</u> effects, both on-site and off-site, are avoided or mitigated; 2. Whether the proposed mitigation measures can be effectively implemented and maintained; 3. The extent to which on-site mitigation measures will support and align with <u>the city-wide Stormwater Strategy, or</u> any catchment or sub-catchment plan to implement the city-wide Stormwater Strategy; and 4. The relevant matters in MRZ-P6, <u>and</u> MRZ-P7 and MRZ-P8.
Advice Note:	

A site-specific stormwater management plan prepared to meet the requirements of SUB-MRZ-R1.2 may be sufficient to meet the requirements of this rule, subject to the management plan being prepared based on the most up to date flood data.

[The Palmerston North Stormwater Bylaw includes information about the Council's expectations for operation and maintenance of stormwater attenuation on private property.](#)

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

418. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R11 – construction, alteration or additions of accessory buildings

419. There are eight submissions to this rule – Leith Consulting (SO170.32) and the NHC (SO210.10) support as notified, while Kevin and Ngaire Smidt (SO116.19), Phocus Planning (SO185.30), Robert and Gill Norris (SO191.19), Horizons (SO194.36) and Enviro NZ (SO203.7) seek a variety of amendments.

420. I recommend accepting SO191.19 as there is already a requirement to comply with MRZ-S9 and S10 in this rule. Regarding SO116.19, since Chapter 4A already defines “accessory building” as “*a detached building, the use of which is ancillary to the use of any building, buildings or activity that is or could be lawfully established on the site, but does not include any minor residential unit*”, I recommend accepting this submission in part.

421. I also consider it appropriate that that the on-site rubbish storage and collection standard applies to new dwellings only, not accessory buildings. While I acknowledge the Enviro NZ (SO203.7) concern that an accessory building may alter rubbish storage areas I consider the potential monitoring and compliance burden associated with applying the standard as sought is disproportionate to the potential level of effect. I therefore recommend rejecting the relief sought.

422. Phocus Planning seeks the application of MRZ-S3 – Setbacks to accessory buildings for the reason that an accessory building could infringe on neighbours.

Further detail is not provided about how such an infringement might be quantified. MRZ-S3 as notified does not apply to accessory buildings located in the side or rear yards and this is not proposed for change in response to submissions on that standard. What I have recommended in response to SO166.22, however, is an amendment to MRZ-S2 – Height in relation to boundary, which would require that accessory buildings are contained beneath a recession plane (see paragraph 450 of this report). In my opinion this would address this submitter's concern. Accordingly, I recommend accepting in part SO185.30.

423. Similar to the relief sought on MRZ-R11, Horizons (SO194.36) is seeking the inclusion of a reference to MRZ-P10 (Energy Efficiency) into the matters of discretion for MRZ-R11.2.1.1. I disagree that MRZ-R12 should this reference for the same reasons as in paragraph 330 and I therefore recommend rejecting the relief sought.
424. As I am not proposing any amendments, I recommend accepting SO170.32 and SO210.10.

MRZ-R12 – Educational facilities, including kohanga reo and kura kaupapa

425. There are eight submissions to this rule, of which five are seeking amendments and two support the rule as notified (Leith Consulting – SO170.33 and Phocus Planning – SO185.31). Horizons (SO194.37) opposes the rule in part and seeks revision to ensure the rule gives effect to Policy MRZ-P10. As Horizons is seeking amendments rather than rejection, I have assessed their submission alongside other submitters seeking changes to the rule. I assessed submissions from Kevin and Ngaire Smidt (SO116.20) and Robert and Gill Norris (SO191.20) as being out of scope and addressed these in paragraph 44.
426. PNCC (SO166.13) seeks an amendment to MRZ-R12.2.2 to correct drafting errors in the rule cross-reference. I recommend accepting these minor corrective amendments.
427. Horizons (SO194.37) seeks revisions to ensure the rule gives effect to MRZ-P10, and hence to One Plan provisions RPS-UF0-O5, ETI-O2, RPS-UFO-PB, and ETI-P5. The notified drafting for MRZ-P10 is “*Encourage the adoption of energy efficient design and site layouts that optimise solar access and manage solar gain*”. I consider it appropriate that a new educational facility should consider energy efficiency where a resource consent is required – noting that the Ministry of

Education is a requiring authority with the power to issue a Notice of Requirement to designate a site, rather than apply for a resource consent. Accordingly, I recommend accepting SO194.37.

428. MoE (SO196.7) seeks amendments to align the standards applying to educational facilities with the Medium Density Residential Standards (MDRS). I do not support this approach for two reasons. Firstly, the MDRS apply to residential activities, rather than non-residential activities. Educational facilities can be significantly bulkier than the three units, up to 11m high, enabled by those standards. And secondly, as a Tier 2 territorial authority, PNCC is not required to adopt these standards. The ODP provisions with regard to building setbacks and building coverage are appropriate in my view to manage effects on adjoining residential properties and to provide outdoor playing space. I therefore recommend rejecting the relief sought in SO196.7.
429. Turning to the submissions supporting MRZ-R12 as notified, as I am recommending amendments to MRZ-R12 in response to SO166.13 and SO194.37, albeit minor, I recommend accepting in part SO170.33 and SO185.31.
430. I recommend the following amendments

Amend MRZ-R12.2.2

...

2. The extent and effects of non-compliance with any requirement in MRZ-R12.1 ~~(e)-(j)~~ which has not been met, including any relevant assessment criteria for MRZ-R12.1 ~~(f)-(j)~~; and
3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P6, MRZ-P10 and MRZ-P12.

431. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R13 – Construction of a new community house

432. There are nine submissions to this rule and one further submission. Leith Consulting (SO170.34), Phocus Planning (SO185.32), Kāinga Ora (SO199.28) and the NHC (SO210.11) support the rule as notified. PNCC (So166.14), Chris Teo-Sherrell

(SO184.73) and Horizons (SO194.38) seek amendments, while Kevin and Ngaire Smidt (SO116.21) and Rober and Gill Norris (SO191.21) oppose the rule and seek that the location of community houses is restricted. Kāinga Ora (FS06.15) opposes SO116.21.

433. PNCC (SO166.14) seeks an amendment to MRZ-R13.2.2 to correct a reference to an ODP provision which does not have associated assessment criteria and correct a minor drafting error. I recommend accepting this minor corrective amendment.
434. Horizons (SO194.38) seeks revisions to ensure the rule gives effect to MRZ-P10, and hence to One Plan provisions RPS-UFO-O5, ETI-O2, RPS-UFO-PB, and ETI-PS. The notified drafting for MRZ-P10 is "*Encourage the adoption of energy efficient design and site layouts that optimise solar access and manage solar gain*". I consider it appropriate that a new community house should consider energy efficiency where a resource consent is required. Accordingly, I recommend accepting SO194.38.
435. I agree with Kāinga Ora (in their further submission opposing SO116.21) that community housing where the standards of the district plan are met are similar in functionality (and hence effects) to a residential dwelling and they should not be subject to increased performance standards. New community houses are permitted activities in the Residential Zone (ODP Rule R10.7.1.1) subject to meeting relevant performance standards and the MRZ takes a similar approach. The suite of standards applying to new community housing in the MRZ is comprehensive and the same as for permitted residential activities (MRZ-R7), and the addition of parking, air noise control, signs, noise and exterior lighting standards is consistent with R10.7.1.1. I therefore disagree with the relief sought by SO116.21 and SO191.21 and recommend these submissions are rejected and FS06.15 is accepted.
436. Turning to the submissions supporting MRZ-R13 as notified, as I am recommending amendments to MRZ-R13 in response to SO166.14, albeit minor, I recommend accepting in part SO170.34, SO185.32, SO199.28 and SO210.11.

437. I recommend the following amendments

Amend MRZ-R13(2)

...

2. The extent and effects of non-compliance with any requirement in MRZ-R13.1(b)-(f) which has not been met, ~~including any relevant matters of discretion assessment criteria for MRZ.R13.1(b)-(e);~~ and

...

438. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R14 – visitor accommodation

439. There are nine submissions to this rule. Kevin and Ngairé Smidt (SO116.34), Leith Consulting (SO170.35) and Robert and Gill Norris (SO191.22) support the rule as notified. The remaining submitters seek amendments to the rule.

440. Phocus Planning (SO185.34) identifies a conflict between this rule and MRZ-R17. MRZ-R14 permits visitor accommodation only where it there is a frontage to a major or minor arterial road, while MRZ-R17 makes visitor accommodation with such frontage a Discretionary Activity. I appreciate the submitter drawing this to my attention and I have recommended changes to MRZ-R17 in response (see paragraph 386 for the analysis of submissions to this rule). I therefore recommend accepting in part SO185.34 as I do not propose amending MRZ-R14.

441. Phocus Planning (SO185.33) also requests the inclusion of a new rule, or an amendment to MRZ-R14 (or the definition of visitor accommodation) to allow for smaller Airbnb-type arrangements. They give the example of the Operative Horowhenua District Plan Rule REZ GRZ-R4, which provides a permitted activity pathway for this type of activity.

442. The proposed definition of visitor accommodation (Section 4A) is *“land and/or buildings used for accommodating visitors, subject to a tariff being paid and includes any ancillary activities”*. This is a NPStds definition and in my view, it encompasses Airbnb-type activities, and the Council is obliged to included it in

PC:I. The question is whether a new rule, or amendment to MRZ-R14 is appropriate.

443. I do not consider that an amendment to MRZ-R14 is appropriate, as this rule targets motels and hotels, with commensurate requirements to manage the anticipated level of effects. I have discussed the potential inclusion of a new rule with Mr Simon Mori – Principal Policy Planner at PNCC and I have reviewed the example provided by SO185.33. While I agree that a new rule could be included in the MRZ, I do not recommend adopting the Horowhenua District Council drafting. The HDC rule appears designed for purpose-built accommodation as it requires compliance with standards applying to new residential development. An existing residential dwelling would have existing use rights for the building size and location and applying potentially unachievable standards would be unreasonable.
444. Accordingly, I recommend a proposed new rule MRZ-R5A, located in the 'activity' section of Chapter 10A. The rule would permit visitor accommodation in an existing residential unit for up to four people per site. If this condition is breached, the activity status would revert to RDA, with the policy direction in MRZ-P5 forming the matters of discretion. This would enable an appropriate assessment of the potential effects associated with a greater number of people. I have considered the compliance burden associated with introducing a new rule. In my opinion, the issue will only arise if and when there is a complaint and this rule will provide a mechanism for assessing the effects if that occurs. I consider it appropriate that any application made under this rule is precluded from public notification. The ability to limited notify is retained, as appropriate in my view.
445. PNCC (SO166.15) seeks an amendment to the matters of discretion to correct a reference to an ODP rule which does not have associated assessment criteria. I recommend accepting this minor corrective amendment. I have also identified a minor numbering error that needs correcting.
446. Horizons (SO194.39) seeks revisions to ensure the rule gives effect to MRZ-P10, and hence to One Plan provisions RPS-UFO-O5, ETI-O2, RPS-UFO-PB, and ETI-PS. The notified drafting for MRZ-P10 is "*Encourage the adoption of energy efficient design and site layouts that optimise solar access and manage solar gain*". I consider it appropriate that new visitor accommodation should consider energy

efficiency where a resource consent is required. Accordingly, I recommend accepting SO194.39.

447. Enviro NZ (SO203.8) requests that MRZ-S19 (On-site rubbish storage and collection) applies to MRZ-R15 visitor accommodation. However, this standard was drafted for residential units and is inappropriate for visitor accommodation. Visitor accommodation has different waste generation patterns and may not require individual bins/crates like residential properties. I therefore recommend rejecting SO203.8.

448. Turning to the submissions supporting MRZ-R13 as notified, as I am recommending amendments to MRZ-R14 in response to SO166.15 and SO194.39, I recommend accepting in part SO116.22, SO170.35 and SO191.22.

449. I recommend the following amendments

2.	Activity status: Restricted Discretionary Where: f.a. Compliance with one or more of the standards of MRZ-R14-1 is not achieved. Council's* discretion is restricted to: 1. The matter(s) of discretion for any infringed standard in MRZ-R14.1(b); 2. The extent and effects of non-compliance with any standard in MRZ-R14.1(c)-(e) which has not been met, including any relevant assessment criteria for MRZ-R14.1 (c)(b)-(d) ; and 3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P6 and MRZ-P12.
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<u>MRZ-R5A Use of an existing residential unit for visitor accommodation</u>	
1.	<u>Activity status: Permitted</u> <u>Where:</u> a. <u>There are no more than four people accommodated in the residential unit</u>
2.	<u>Activity status: Restricted Discretionary</u> <u>Where:</u> a. <u>There is a non-compliance with MRZ-5A.1.</u> <u>Council's* discretion is restricted to:</u> 1. <u>The relevant matters in MRZ-P5.</u>

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

450. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R15 – construction of a health facility

451. There are seven submissions to this rule. Kevin and Ngaire Smidt (SO116.23), Leith Consulting (SO170.36), Phocus Planning (185.35) and Robert and Gill Norris (SO191.23) support the rule as notified. The remaining submissions seek amendments.

452. PNCC (SO166.16) seeks a minor amendment to correct an incorrect rule cross-reference. I recommend accepting this relief.

453. Horizons (SO194.40) seeks revisions to ensure the rule gives effect to MRZ-P10, and hence to One Plan provisions RPS-UFO-O5, ETI-O2, RPS-UFO-P8, and ETI-P5. The notified drafting for MRZ-P10 is “*Encourage the adoption of energy efficient design and site layouts that optimise solar access and manage solar gain*”. I consider it appropriate that a new health facility should consider energy efficiency where a resource consent is required. Accordingly, I recommend accepting SO194.40.

454. Turning to the submissions supporting MRZ-R14 as notified, as I am recommending amendments to MRZ-R14 in response to SO166.16 and SO194.40, I recommend accepting in part SO116.22, SO170.36, SO185.35 and SO191.23.

455. I recommend the following amendments

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with one or more of the standards of MRZ-R15.1 is not achieved.

Council's* discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-R15.1(b)
2. The extent and effects of non-compliance with any requirement in MRZ-R15.1(c)-(h) which has not been met, including any relevant assessment criteria for MRZ-~~R14.1~~R15.1(c)-(g); and
3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P6, MRZ-P10 and MRZ-P12.

456. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R16 – Marae

457. There are six submissions to this rule. Rangitāne (SO137.27) and Leith Consulting (SO170.37) support the rule as notified. Kevin and Ngaire Smidt (SO116.24) and Robert and Gill Norris (SO191.24) oppose the rule, on the basis of location and effects. I have addressed the Phocus Planning submission (SO185.36) in paragraph 429 with other submissions relating to limited notification. The remaining submitters seek amendments.

458. With regard to SO116.23 and SO191.24, I acknowledge that there are occasions at marae where activities, such as tangi, can last for several days. This is not unique to marae. Sports and religious events, for example, can last several days, within inside and outside activities, at facilities located in the residential zone without requiring special restriction. The submitters have not identified where marae should be located and I disagree that marae should be limited to certain parts of the city, as sought by these submitters. The controls these submitters have identified, such as distance from residential areas, appropriate road access to avoid interfering with traffic flow and adequate on-site parking are already addressed by the Restricted Discretionary Activity status and the matters of discretion in relation to traffic, site layout and bulk and location. The pre-ambule to the Rules section of Section 10A states that the Air Noise Control rules in the ODP applying to the Residential Zone also apply to the MRZ. In my opinion therefore amendments are not required to the rule, and I recommend rejecting the relief sought.

459. Turning to the submissions supporting MRZ-R16 as notified, as I am recommending amendments to MRZ-R16 in response to SO185.36, I recommend accepting in part SO137.27 and SO170.37.

460. I recommend the following amendments

1. Activity status: **Restricted Discretionary**

*Council's** discretion is restricted to:

1. The *effects* on pedestrian safety and the safe and efficient movement of vehicles and other *road* users;
2. The extent to which *site* layout and any proposed landscaping helps avoid or minimise *effects* from *building* bulk and form on surrounding residential areas, the streetscape, and adjoining public space in relation to *building* dominance, privacy and shading;
3. The matter(s) of discretion in MRZ-S1, MRZ-S2, MRZ-S3, MRZ-S4, MRZ-S5, MRZ-S6 and MRZ-S17; and
4. The relevant matters in MRZ-P4, MRZ-P5, MRS-P6, MRZ-P8, MRZ-P10, MRZ-P11 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

Rangitāne o Manawatū must be limited notified in accordance with section 95A of the Resource Management Act 1991 of an application under this rule if the applicant is an *iwi**, *hapū**, *whānau*, Māori or other entity other than Rangitāne o Manawatū, [unless they provide written approval to the proposal](#).

461. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R17 - Variety of residential and non-residential activities, including retirement villages, residential centres and visitor accommodation

462. There are six submissions to this rule and one further submission. The Fuel Companies (SO78.4) (opposed by Kāinga Ora (FS06.09)), Kevin and Ngaire Smidt (SO116.25), Leith Consulting (SO170.38) and Robert and Gill Norris (SO191.25) support the rule as notified. Two submitters seek amendments.

463. Phocus Planning (SO185.37) seeks resolution of the conflict with MRZ-R14 in relation to visitor accommodation. MRZ-R17 is based on operative Rule

R10.7.4.2.⁷³ Motel Conference Centres that have frontage and access to other roads would be a Non-Complying Activity (ODP Rule R10.7.5.1).

464. Motel Conference Centres are defined in ODP Section 4 as "land and/or buildings used to provide transient residential accommodation while associated with conference/training facilities and dining and drinking facilities", while the NPStds definition for visitor accommodation (to be introduced via PC:I) is "land and/or buildings used for accommodating visitors subject to a tariff being paid and includes any ancillary activities". I do not consider training/conference facilities and dining and drinking facilities to be 'ancillary' such as to fall within the definition of visitor accommodation, as these activities can occur separately to providing accommodation (and often do). I consider, therefore, that the reference in MRZ-R17 should be amended to replace 'visitor accommodation' with 'Motel Conference Centres' to be consistent with the equivalent rule in Section 10 and I recommend accepting SO185.37.

465. Turning to the submissions supporting MRZ-R17, since I am recommending amendments to MRZ-R17 as above, I recommend accepting in part SO78.4, SO116.25, SO170.38 and SO191.25. I recommend rejecting Kāinga Ora's further submission FS06.09. Kāinga Ora did not make a primary submission to MRZ-R17 seeking any amendments. As The Fuel Companies support the rule as notified, Kāinga Ora's opposition to inclusion of reverse sensitivity for non-residential activities is outside the of scope of the Fuel Companies' submission.

466. I recommend the following amendments

Amend MRZ-R17

MRZ-R17 Retirement Villages and Residential Centres*, ~~Visitor Accommodation Motel Conference Centres~~ with frontage to a Major Arterial or Minor Arterial Road as listed in Appendix 20A, Community Facilities, Places of Worship*, Training Facilities*, Health Centres* and Hospitals and Early Childhood Facilities*

...

467. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified

⁷³ Which makes Motel Conference Centres with frontage onto, and the main vehicle access from, a Major and Minor Arterial Road a Discretionary Activity.

provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R18 – fences and standalone walls

468. There are six submissions to this rule. Kevin and Ngaire Smidt (SO116.25), Leith Consulting (SO170.39) and Robert and Gill Norris (SO191.26) support the rule as notified. The remaining submissions seek amendments.
469. PNCC (SO166.17) seeks the replacement of MRZ-S6 with MRZ-S20, while Phocus Planning (SO185.38) seeks the removal of MRZ-S6. The reference to MRZ-S6 is a drafting error – the rule should refer to MRZ-S20. I agree with both submissions and therefore recommend accepting the relief sought.
470. Turning to the submissions supporting MRZ-R18 as notified, since I am recommending amendments to MRZ-R18 in response to SO166.17 and SO185.38 (albeit minor), I recommend accepting in part SO116.26, SO170.39 and SO191.26.
471. I recommend the following amendments

Amend MRZ-R18.1 1. Activity status: Permitted Where: a. Compliance with MRZ-S 6 <u>20</u> is achieved:
Amend MRZ-R18.2(1) 2. Activity status: Restricted Discretionary Where: a. Compliance with MRZ-R18-1 is not achieved. <i>Council's*</i> discretion is restricted to: 1. The matters of discretion for MRZ- S 6 <u>20</u>

472. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan

provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R19 – Buildings, accessory buildings or structures adjacent to overhead electricity lines

473. There are five submissions on this rule. Powerco Limited (SO107.4) seeks renumbering of the rule to correct an error, which I agree with. I therefore recommend accepting Powerco's relief and accepting submissions from Kevin and Ngaire Smidt (SO116.27), Leith Consulting (SO170.40), Phocus Planning (SO185.39) and Robert and Gill Norris (SO191.26) to retain the rule as notified as the amendment is not material.

474. I recommend the following amendments

Amend MRZ-R19.1

...

~~2.~~ **1.** Activity status: **Permitted**

Where:

a. any *building, accessory building or structure* is set back from an overhead electricity *line** in accordance with the New Zealand Electrical Code of Practice for Electrical Safe Distances – NZECP 34:2001.

...

475. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-R20 – New buildings, alterations or additions to buildings within 50m of the state highway

476. There are six submissions on this rule. PNCC (SO166.18) seeks the inclusion of text which would preclude limited notification to NZTA if they have already provided written approval. I address this submission point in Issue 8, at paragraph 426. Consequently, I recommend accepting in part submissions from Kevin and Ngaire Smidt (SO116.28), Leith Consulting (SO170.41), Phocus Planning

(SO185.40), Robert and Gill Norris (SO191.28) and NZTA (SO209.3) to retain the rule as notified.

MRZ-R21 – Building setback from rail corridor for construction, addition and alternation of any building

477. There are four submissions to this rule. Kevin and Ngaire Smidt (SO116.29), Leith Consulting (SO170.42) and Robert and Gill Norris (SO191.29) support the rule as notified. Phocus Planning (SO185.41) considers the rule should be included as a condition of MRZ-R22, rather than remain as a standalone rule. Phocus Planning has not provided suggested drafting.
478. I have considered the relief sought by Phocus Planning, and there are advantages to combining the rules, including reducing the overall number of rules and simplifying requirements for activities near the rail corridor. However, I recommend retaining the rules as notified because they address two separate issues. Rule MRZ-R19 relates to maintenance access and safety – the trigger for shifting to an RDA status is distance from the corridor. Rule MRZ-R20 relates to noise and ventilation requirements. My concern with combining the rules is that this would result in an overly complicated rule which is difficult for plan users to follow. I prefer ease of use over a nominal reduction in the number of rules. I therefore recommend rejecting the relief sought by SO185.41.
479. Turning to the submissions supporting MRZ-R21 as notified, as drafting amendments are not recommended, I recommend accepting SO116.29, SO170.42 and SO191.29.

MRZ-R22 – new buildings, alterations and additions to buildings within 100m of the rail corridor

480. There are two submissions to this rule, both of which support retention as notified. I therefore recommend accepting Leith Consulting (SO170.43) and Phocus Planning (SO185.42).

MRZ-R23 – use of copper and zinc building materials

481. There are five submissions to this rule. Kevin and Ngaire Smidt (SO116.30) and Robert and Gill Norris (SO191.30) oppose the rule. Leith Consulting (SO170.44) and

Horizons (SO194.42) support as notified, while Phocus Planning (SO185.43) questions how compliance will be demonstrated.

482. With regard to SO116.30 and SO191.30, I rely on the evidence of the Council's stormwater expert Ms Wood, at paragraphs 78 and 79, that a precautionary approach to managing these metals to limit leaching. Further, the cumulative effect of multiple properties using copper and/or zinc can result in elevated metal concentrations in a catchment. I therefore recommend rejecting these submissions.
483. Compliance with this requirement, as with others related to the built structure of a new dwelling, can be assessed at the building consent phase, as part of the check of whether a resource consent is required.⁷⁴ I therefore recommend rejecting SO185.43.
484. I am not recommending any amendments to MRZ-R23 in response to submissions, and therefore I recommend accepting submissions SO170.44 and SO194.42.

MRZ-R24 – stormwater treatment for four or more carparks

485. There are nine submissions to this rule. Kevin and Ngaire Smidt (SO116.31), Leith Consulting (SO170.45) Robert and Gill Norris (SO191.31) and Horizons (SO194.43) support retaining the rule as notified. Phocus Planning (SO185.44) considers there should be a PA rule for stormwater treatment (supported in part by Leith Consulting (FS01.10) and opposed in part by Kāinga Ora (FS06.19), while Kāinga Ora (SO199.29) seeks rule deletion. Rangitāne (SO137.28) seeks inclusion of an Advice Note. PNCC (SO166.19) proposes amendments to shift from number of car parks to an area (supported by Leigh Consulting (FS01.3)). Leigh Consulting (SO170.46) proposes amending the rule title.
486. I agree with the relief sought by SO166.19 and therefore recommend accepting this submission and FS01.3. As notified, using the number of car parks as the trigger for stormwater treatment does not provide enough certainty for plan users – adopting an area threshold provides more certainty about when the rule would apply and it would be more easily monitored if required. Minor, consequential, amendments are required to matter of discretion 1 to accurately reflect the

⁷⁴ Section 37 of the Building Act 2004.

amended rule title and requirements. The PNCC relief would also address the relief sought by SO185.44 (and FS01.10) for a permitted activity. I note that I don't agree with all the reasons identified by Phocus Planning or Leith Planning – stormwater treatment is not just the responsibility of PNCC. This rule gives effect to Clause 3.5(4) of the NPS-FM.

487. I agree with the relief sought by SO137.28 to include an Advice Note, on the proviso that consent notices can only be applied to subdivision consents, and the rules in Chapter 10A control land use activities. I recommend including an advice note which refers to the Palmerston North Stormwater Bylaw.
488. I disagree with the relief sought by SO170.46 – making this amendment would change the intent of the rule as the focus is not on the number of carparks per se but triggering a requirement for stormwater treatment. I therefore recommend rejecting SO170.46.
489. I agree with SO199.29 that the trigger for the rule should be based on an area rather than the number of carparks. I rely on the evidence of Ms Wood that the proposed area is appropriate.⁷⁵ I disagree with the remainder of the relief sought in SO199.29. The requirement for stormwater treatment is not restricted to residential activities and it should not be restricted to four or more houses either. There is no minimum site area in proposed Chapter 10A, and it is feasible that there could be larger sites as a permitted activity which result in 100m² or more of parking, manoeuvring or access area. I consider it appropriate for this requirement to remain as a stand-alone rule. Further, as this rule currently only applies to the MRZ, I consider it appropriate it remains in Chapter 10A. As part of the sectional ODP review, this policy could be applied more broadly, in which case relocation may be appropriate at that stage. I recommend rejecting the relief sought by SO199.29 insofar as it relates to deleting MRZ-R24. As I consider 100m² is an appropriate area, I therefore recommend rejecting FS06.30.
490. As I am recommending amendments to MRZ-R24, I recommend accepting in part SO116.31, SO170.45, SO191.31 and SO194.43.

MRZ-R24 Stormwater treatment for parking and manoeuvring areas, and access ways four or more carparks (including garages)

⁷⁵ Statement of Evidence of Mary Wood, dated 25 July 2025, paragraph 81

1. Activity status: **Permitted**

Where:

- a. The cumulative area of any parking area, manoeuvring area and access way on a site is less than 100m².

2+. Activity status: **Restricted Discretionary**

Where:

- a. The standard in MRZ-R24.1 is not met.

Council's* discretion is restricted to:

1. The extent to, and method(s) by, which stormwater runoff from the ~~parking area, car parks, including any~~ manoeuvring areas and access ways, is captured and directed to a *stormwater* treatment device;
2. The suitability of the *stormwater* treatment device for treating the predicted volume of *stormwater*, potential *contaminants* and *site* conditions; and
3. The proposed approach to ongoing maintenance of the *stormwater* treatment device to secure ongoing operation.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

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 Council's Residential Bioretention Design Guide.

The Palmerston North Stormwater Bylaw includes information about the Council's expectations for operation and maintenance of stormwater attenuation on private property.

491. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

New rules

492. There are three submissions seeking new rules - SO166.20 (supported by FS01.4), SO184.35 and SO210.1 (opposed by FS06.45).

493. I recommend amending PC:I to include the new rule proposed by SO166.20. This would introduce a 'catch-all' rule requiring a discretionary activity consent for any activities which were not otherwise identified as permitted, controlled or restricted discretionary. I have considered whether a permitted, controlled or restricted discretionary activity would be a more effective or efficient activity status. The benefit of a discretionary activity status is that would enable a consideration of any effects as part of a resource consent application and the application of any appropriate conditions. It would be less efficient or effective to attempt to identify matters of discretion or control without knowing what the activity is. I consider it would also be less efficient or effective to enable the establishment of unknown activities without the ability to assess the effects. In recommending acceptance of SO166.20, I also recommend accepting FS01.4.
494. With regard to SO184.35, with the introduction of proposed new rule MRZ-R25 there would be nothing preventing an application for a shared parking building, should a developer wish to pursue this. I do not consider it appropriate that this is provided for as a permitted activity for the very reason identified by this submitter – it is unclear whether this land use would be compatible with the residential nature of the zone. I therefore recommend rejecting the relief sought.
495. Following pre-hearing discussions with the NHC, I recommend accepting in part SO210.1 on the basis that I understand NHC is satisfied that Council's existing process for assessing potential liquefaction hazards appropriately addresses this risk. The Council's process is set out in **Appendix 7** to this report. Accordingly, I recommend accepting FS06.45 as there is already an assessment of risk as part of the existing building consent or subdivision processes.
496. I recommend the following amendments

Include a new rule:

MRZ-R25 Any activity not otherwise identified as permitted, controlled, restricted discretionary or discretionary

1. Activity status: Discretionary

Where:

- a. Any activity or the construction, alteration or addition of buildings or structures is not provided for in rules MRZ-R1-R24

497. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

Application of R10.7.1.9 and R10.7.4.10

498. I recommend accepting NZDF's (SO202.1) submission to retain the application of these rules to the MRZ. They relate to temporary military training activities, and it is appropriate that a consistent approach is taken across the Residential and Medium Density zones.

Restricted discretionary activity status

499. I recommend accepting SO170.47 as this submitter is seeking the retention of the RDA status for rules in Chapter 10A.

General submissions on MRZ rules

500. As part of his submission Chris Teo-Sherrell made a number of submissions on MRZ-R7 which sought amendments to every MRZ standard that construction of one-three dwellings would need to comply with in order to be a permitted activity (MRZ-S1 – S21).⁷⁶ When considering the relief sought, these submission points were allocated to the relevant standards rather than MRZ-R7 and considered alongside other submissions on the same standard.
501. Mr Teo-Sherrell then made submission points to MRZ-R8 – MRZR18 seeking similar relief to that sought for MRZ-R7.⁷⁷ As the relief sought by Mr Teo-Sherrell on MRZ-R7 traverses 21 different standards and I have made a variety of recommendations in response to his submission points, I recommend accepting in part SO184.68 – SO184.78. I direct the Hearing Commissioners to my consideration of submissions on standards in paragraphs 440- 588 of this report.

⁷⁶ Submission references SO184.36 – SO184.66

⁷⁷ Categorized as submissions SO184.68 – SO184.78

Chapter 7B – Subdivision in the MRZ rules

SUB-MRZ-R1

502. There are ten submission points relating to SUB-MRZ-R1 and one further submission. The NHC (SO210.18) supports the rule as notified, subject the amendments they sought to MRZ-S11. Eight submitters seek amendments and There are 10 submission points supporting the rules with proposed changes. Kāinga Ora (SO199.11) seeks that SUB-MRZ-R2 (Subdivision in the Stormwater Overlay) is deleted or, if it is retained, that limited notification is precluded.
503. Grant Binns (SO93.4) seeks a requirement for a sewer capacity plan for development, to mitigate potential impacts from intensification. The Wastewater Servicing Assessment, which forms part of the evidence base for PC:I concludes that there is either sufficient capacity in the existing network or funding in the Long Term Plan for any required upgrades. As a result, a sewer capacity plan is not required, and I recommend this submission is rejected.
504. PNCC seeks a variety of amendments to the rule as notified. Much of the relief sought is focused on splitting the rule into two – SUB-MRZ-R1 would address subdivision outside the Stormwater Overlay, while proposed rule SUB-MRZ-R1A would address subdivision within the Stormwater Overlay. I support this approach as it will provide clarity for plan users without changing the relevant activity status or consent requirements. I therefore recommend accepting SO166.45 and SO166.47 and FS01.9.and recommend rejecting FS06.35. This approach would require consequential amendments to SUB-MRZ-R1 to remove references to the Stormwater Overlay and update cross-referencing within the rule, and to remove the reference to SUB-MRZ-P4. I agree these are required as a result of splitting the rule and therefore recommend accepting SO166.44 and SO166.46. The proposed drafting for SUB-MRZ-R1A is provided in the table below paragraph 502.
505. PNCC also seeks minor amendments to the Advice Notes in SUB-MRZ-R1 and what would be proposed rule SUB-MRZ-R1A, to remove the year from references to the bylaws. As these bylaws are referenced in an Advice Note, rather than incorporated by reference (as per Part 3, Schedule 1 of the RMA), I consider removing the year reference is appropriate. I therefore recommending accepting SO166.40 and SO166.41.

506. Rangitāne o Manawatū (SO137.40) proposes several amendments to the matters of discretion for SUB-MRZ-R1.2 (which will become SUB-MRZ-R1A). Rangitāne seeks inclusion of an additional reference to the city-wide Stormwater Strategy, a new matter of discretion related to maintenance, sufficient scope for Council to ensure neighbouring stormwater attenuation is not compromised by new development and an amendment to the Advice Note to refer to consent notices for installation and maintenance of any on-site stormwater attenuation mitigation.
507. During a pre-hearing meeting with Rangitāne, this submitter agreed that a new matter of discretion was not required for MRZ-R10 as this is already encompassed in matter of discretion 'a').⁷⁸ Similarly, I consider the relief sought for SUB-MRZ-R1A is already encompassed in the notified matters of discretion insofar as they relate to effects that may arise from subdivision. I consider the Stormwater Management Plan required for subdivision in the Stormwater Overlay, and the ability for Council to consider the effectiveness of proposed mitigation (in SUB-MRZ-P4) provides the scope sought by Rangitāne. I understand the Council currently uses Consent Notices in the manner sought by the submitter, and therefore I agree that the Advice Note should be amended to reflect this. Based on the above analysis, I recommend accepting in part SO137.40.
508. Kāinga Ora (FS06.24) opposed in part the relief sought by SO137.40 with regard to the inclusion of a new matter of discretion and the inclusion of a consent notice as a matter of discretion. I recommend accepting in part this further submission insofar as I am not recommending inclusion of a new matter of discretion. I acknowledge the city-wide Stormwater Strategy is not yet complete. However, the notified version of SUB-MRZ-R1.2 (which has become SUB-MRZ-R1A) already included a reference to the city-wide Stormwater Strategy and there are no submissions opposing this. Accordingly, I consider the principle of referring to this forthcoming strategy has already been accepted by submitters.
509. I do not see as an issue because matter of discretion f) refers to “*the extent to which on-site mitigation measures will support and align with ...*” as applications for subdivision consent prepared before the Stormwater Strategy has been adopted would simply include a statement that there is currently no strategy.

Finally, Rangitāne has not sought the conversion of the notified Advice Note into a matter of discretion – they are seeking an amendment to the advice note. On the basis of the above analysis, I therefore recommend accepting in part FS06.24.

510. Phocus Planning (SO185.72) seeks inclusion of a controlled activity pathway for subdivision in the Stormwater Overlay on the basis that s106 of the RMA can still be used where there is natural hazard risk. My understanding of the RMA is that a council can only decline a controlled activity application if there is insufficient information to determine whether the activity is a controlled activity (s 104A(a)). In my understanding there is nothing in s 106 RMA to override this.
511. In my view it is critical that Council can decline subdivision consents in the Stormwater Overlay and the relief sought by Phocus Planning would prevent this. I therefore recommend rejecting SO185.72.
512. Phocus Planning (SO185.73) wants to remove most MRZ standards for subdivision outside the Stormwater Overlay because they argue that existing buildings that do not comply with current standards should not have to meet those standards just to subdivide. I have considered the relief sought by this submitter and I agree that some standards should be removed from this rule, although not to the extent sought by SO185.73. I recommend accepting in part this submission. In my opinion, an allotment for an existing dwellings should still comply with the following standards as these standards are either influenced by the relationship of the building to the property boundary, they reflect minimum acceptable standards for intensification, or they reflect updated requirements in terms of stormwater management:
- (a) MRZ-S2 – Height in relation to boundary
 - (b) MRZ-S3 – Setbacks
 - (c) MRZ-S4 – Building coverage
 - (d) MRZ-S5 – Landscaped areas
 - (e) MRZ-S7 – Outdoor living space
 - (f) MRZ-S9 – Permeable surfaces

- (g) MRZ-S10 – Stormwater attenuation device
- (h) MRZ-S16 – Vehicle crossings
- (i) MRZ-S17 – On-site vehicle manoeuvring
- (j) MRZ-S18 – On-site bicycle parking
- (k) MRZ-S19 – On-site rubbish and recycling storage and collection
- (l) MRZ-S20 – Fences and standalone walls

513. The NHC (SO210.18) supports SUB-MRZ-R1 as notified, subject to the amendments they seek to MRZ-S11⁷⁹. I recommend accepting in part this submission as I have not accepted all the amendments sought by this submitter to MRZ-S11 (see paragraph 94).

514. In reviewing submissions on this rule, I identified a minor amendment was required for drafting consistency, to include the name of the standard MRZ-R24.

515. I recommend the following amendments

SUB-MRZ-R1 Subdivision in the Medium Density Residential Zone	
1.	<p>Activity status: Controlled</p> <p>Where:</p> <p>a. Where the site is not located within the Stormwater Overlay; and</p> <p>a. Compliance with the following standards is achieved:</p> <ul style="list-style-type: none"> i. Standards MRZ-S12 – MRZ-S7, MRZ-S9 – MRZ-S10, MRZ-S16 – MRZ-S20, for <u>allotments lots</u> created with an existing dwelling*; ii. SUB-MRZ-S1 – Access*; iii. SUB-MRZ-S2 – Vehicle crossings; iv. SUB-MRZ-S3 – <i>Essential services</i>*; v. SUB-MRZ-S4 – Street trees; <p>b. Accesses* comply with R20.4.2</p> <ul style="list-style-type: none"> i. 20.4.2(a)(i)-(v); ii. 20.4.2(a)(vi)(b-j); iii. 20.4.2(a)(vii)-(viii); and <p>c. <i>Earthworks</i> comply with R6.3.6.1 (b).</p>

⁷⁹ SO210.14

d. MRZ-R24 - Stormwater treatment for parking and manoeuvring areas, and access ways

Council's* control is restricted to:

1. The matter(s) of control for any infringed standard in SUB-MRZ-R1.1(b)-(e);
2. The provision of practical, physical and legal access* from each *allotment* directly to a formed legal road or by a registered right of way;
3. *Subdivision* design and layout and the size, shape and arrangement of proposed *allotments*;
4. The *effect* of *earthworks* on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation; and
5. Whether the *subdivision* design and layout meets the requirements of the Council's* Engineering Standards for Land Development.

Advice Note:

Service connections to the public *stormwater* network must comply with the Palmerston North Stormwater Bylaw **2022**, service connections to the public *wastewater* network must comply with the Palmerston North Wastewater Bylaw **2019** and service connections to the public water supply network must comply with the Palmerston North Water Supply Bylaw **2024**.

Notification:

An application under this rule is precluded from being publicly notified or limited notified in accordance with section 95A or section 95B of the Resource Management Act 1991 where the *subdivision* is associated with *residential units* or *papakāinga** that are permitted under MRZ-R7.

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991 if the *subdivision* is associated with an application for the construction of 1-3 *residential units* or *papakāinga** that do not comply with MRZ-R7.

~~2. Activity status: Restricted-Discretionary~~

~~Where:~~

~~a. Compliance with SUB-MRZ-R1.1(a) is not achieved.~~

~~Council's* discretion is restricted to:~~

- ~~5. The effect of earthworks on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation;~~
- ~~6. Setting of minimum floor levels;~~
- ~~7. Setting of maximum impervious surface area;~~
- ~~8. Subdivision design and layout and the size, shape and arrangement of proposed allotments;~~
- ~~9. 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~~
- ~~10. Whether the subdivision design and layout meets the requirements of the Council's* Engineering Standards for Land Development; and~~

~~11. The relevant matters in SUB-MRZ-P3 and SUB-MRZ-P4.~~

~~Advice Note:~~

~~Service connections to the public stormwater network must comply with the Palmerston North Stormwater Bylaw 2022, service connections to the public wastewater network must comply with the Palmerston North Wastewater Bylaw 2019 and service connections to the public water supply network must comply with the Palmerston North Water Supply Bylaw 2024.~~

~~Notification:~~

~~An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.~~

23. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with one or more of the standards in SUB-MRZ-R1.1 (~~ab~~)-(d) is not achieved.

Council's* discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-S1-MRZ-S20;
2. The matter(s) of ~~control~~ discretion for any infringed standard in SUB-MRZ-R1.1 (~~ab~~) (~~ii~~ ~~iii~~)-(v) and (b)-(d);
3. *Subdivision* design and layout and the size, shape and arrangement of proposed *allotments*;
4. The safe and efficient operation of the roading network;
5. The *effect* of *earthworks* on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation; and
6. The relevant matters in SUB-MRZ-P1, SUB-MRZ-P2, SUB-MRZ-P3, ~~SUB-MRZ-P4~~ and SUB-MRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

An application under this rule is precluded from being limited notified in accordance with section 95B of the Resource Management Act 1991 except in relation to the width of a *site access** and *earthworks*.

SUB-MRZ-R1A Subdivision within the Stormwater Overlay

1. Activity status: **Restricted Discretionary**

Council's* discretion is restricted to:

- a. Standards MRZ-S12 – MRZ-S7, MRZ-S9 – MRZ-S10, MRZ-S16 – MRZ-S20, for *allotments* lots created with an existing *dwelling**;
- b. The *effect* of *earthworks* on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation;
- c. Setting of minimum floor levels;

- d. Setting of maximum impervious surface area;
- e. Subdivision design and layout and the size, shape and arrangement of proposed allotments;
- f. 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-wide Stormwater Strategy
- g. Whether the subdivision design and layout meet the requirements of the Council's* Engineering Standards for Land Development; and
- h. The relevant matters in SUB-MRZ-P1, SUB-MRZ-P2, SUB-MRZ-P3, SUB-MRZ-P4 and SUB-MRZ-P5.

Advice Note:

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.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

516. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MR-R2

517. There are two submission points relating to SUB-MRZ-R2. PNCC SO166.48 proposes to add a matter of control relating to the MRZ development standards and a corresponding matter of discretion. While no reasons were provided, I infer PNCC is concerned about the lack of minimum lot size in the MRZ. Without size controls, subdivision could create vacant allotments too small to accommodate a permitted dwelling under MRZ-R7, forcing future owners to seek land use consent or potentially making the lot unbuildable while still being able to be sold as a separate title.

518. . I have considered the standards PNCC consider should apply to vacant allotments and propose amendments to this list. Rather than MRZ-S1 – S5, MRZ-S7 – S9 and MRZ-S16 – S17, I consider the relevant standards are those which would

be influenced by the location of a building within a vacant allotment, including access to that allotment. as these ultimately influence the required allotment size and future building design.

- (a) MRZ-S4 – Building coverage;
- (b) MRZ-S5(1) and (2) – Landscaped areas;
- (c) MRZ-S7 – Outdoor living space;
- (d) MRZ-S9 – Permeable surfaces;
- (e) MRZ-S16 – Vehicle crossings;
- (f) MRZ-S17 – On-site vehicle manoeuvring.

519. In proposing amended drafting for this rule, PNCC proposed deleting matter of control 5, I assume because it was not considered relevant for subdivision creating vacant allotments. However, I consider part 3 of SUB-MRZ-P3 is relevant for this rule and I therefore reject this aspect of the relief sought in SO166.48. On this basis, I recommend accepting in part the relief sought. I would note there have been no further submissions on this rule objecting to the proposed amendments.

520. As I am recommending amendments to the rule, I recommend accepting in part SO185.74.

521. I recommend the following amendments:

SUB-MRZ-R2 Subdivision that creates any vacant allotment	
1.	<p>Activity status: Controlled</p> <p>Where:</p> <p>a. Compliance with the following standards is achieved:</p> <ul style="list-style-type: none"> i. Standard MRZ-S11; ii. SUB-MRZ-S1 – Access; iii. SUB-MRZ-S2 – Vehicle crossings; iv. SUB-MRZ-S3 – Essential services; v. SUB-MRZ-S4 – Street trees; <p>b. Accesses comply with R20.4.2</p>

- i.20.4.2(a)(i)-(v);
- ii.20.4.2(a)(vi)(b-j);
- iii.20.4.2(a) (vii)-(viii); ~~and~~
- c. Earthworks comply with R6.3.6.1 (b); ~~and~~;
- d. Where it is demonstrated that the vacant allotment/s can comply with MRZ-S4 – MRZ-S5(1) and (2), MRZ-S7, MRZS9 and MRZ-S16 – MRZ-S17.

Council's control is restricted to:

1. The provision of practical, physical and legal access from each allotment directly to a formed legal road or by a registered right of way;
2. Subdivision design and layout and the size, shape and arrangement of proposed allotments;
3. The effect of earthworks on flooding and overland flow paths, hazard risk and erosion and sedimentation;
4. Whether the subdivision design and layout meets the requirements of the Council's Engineering Standards for Land Development; and
5. Whether a residential unit can be contained within the allotment which complies with MRZ-S4 – MRZ-S5(1) and (2), MRZ-S7, MRZS9 and MRZ-S16 – MRZ-S17;

Advice Note:

Service connections to the public stormwater network must comply with the Palmerston North Stormwater Bylaw 2022, service connections to the public wastewater network must comply with the Palmerston North Wastewater Bylaw 2019 and service connections to the public water supply network must comply with the Palmerston North Water Supply Bylaw 2024.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act.

522. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MRZ-R3

523. PNCC (SO166.49) proposes minor grammatical changes to replace 'lot' with 'allotment'. Consistent with my recommendation on SO166.38 (see paragraph 73) I recommend accepting the relief sought. Phocus Planning supports the rule as notified (SO185.75). As I am recommending minor drafting amendments

which do not change the intent of the rule, I recommend accepting this submission.

524. I recommend the following amendments.

SUB-MRZ-R3 Cross lease, company lease, boundary adjustment or unit title subdivision around existing buildings or buildings under construction	
1.	<p>Activity status: Controlled</p> <p>Where:</p> <ul style="list-style-type: none">a. There are no new undeveloped separately disposable allotments, cross leases, company areas or units created; andb. Compliance with the following standards is achieved:<ul style="list-style-type: none">i. SUB-MRZ-S1 – Access;ii. SUB-MRZ-S2 – Vehicle crossings;iii. SUB-MRZ-S3 – Essential services; andiv. SUB-MRZ-S4 – Street trees. <p>Council's control is restricted to:</p> <ul style="list-style-type: none">1. The matter(s) of control for any infringed standard in SUB-MRZ-R1.1 (b);2. Subdivision design and layout and the size, shape and arrangement of proposed allotments; and3. The design and location of any site access. <p>Notification:</p> <p>An application under this rule is precluded from being publicly notified in accordance with section 95A or limited notified in accordance with section 95B of the Resource Management Act 1991.</p>

525. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MRZ-R4 and SUB-MRZ-R5

526. Phocus Planning (SO185.76, SO185.77 & SO185.78)) supports these rules as notified. As these are the only submissions to these rules, I recommend that these submission points are accepted.

P. ISSUE 8: WHETHER THE NOTIFICATION PROVISIONS ARE SET APPROPRIATELY

527. There are 11 submission points related to notification – nine in relation to Chapter 10A and two for Chapter 7B. There is one further submission. Some submissions relate to notification clauses in specific rules while the remainder apply to the entire plan change.

Chapter 10A notification provisions

528. Karwa Dyer (SO04.1), Gerard Tapp (SO56.1), Hern Teo-Sherrell (SO104.4), Roanne Hautapu (SO129.1), John and Margaret Wood (SO159.4) and John Ireland (SO206.1) consider that developers should be required to notify and/or consult immediate neighbours before residential intensification occurs and/or that resources consents should be required for all residential intensification.

529. Rangitāne (SO137.35) supports the limited notification clauses as notified and seeks these are retained.

530. PNCC (SO166.18) seeks an amendment to MRZ-R20.2 to require that the NZ Transport Agency (NZTA) is limited notified of an application under this rule which does not achieve the required maximum indoor design noise levels or the required ventilation standards. Phocus Planning (SO(185.36) seeks to include “*unless the written approval to the proposed is provided*” to the notification clause in MRZ-R16, for new marae.

Notification of immediate neighbours

531. I do not agree that all resource consent applications in the MRZ should require a resource consents and/or that the immediate neighbours are notified before intensification can occur. This would conflict with the direction in Policy 5 of the NPS-UD that PNCC “*enables heights and density of urban form*”.

532. The reasons given for this relief primarily relate to concerns about effects on amenity of immediate neighbours. While I acknowledge that residential intensification will change the environment for existing residents, Policy 6 of the NPS-UD requires that decision-makers have regard to that fact that intensification may result in significant changes to an area, that these changes may both detract and improve amenity values, and that changes in amenity values are not, of themselves, an adverse effect (emphasis added). Maintaining the status

quo with regard to the existing urban environment does not address the need to enable more housing to meet the demand identified in Council's most recent HBA.

533. While changes in amenity values are not, of themselves, an adverse effect, the proposed standards in PC:I have been developed to create an envelope of acceptable effects, including in relation to sunlight and daylight access and so that the same requirements apply across the zone. The effect of development on property values is not a matter which is addressed under the RMA.
534. Based on the above analysis, I recommend that submissions SO04.1, SO56.1, SO104.4, SO129.1, SO159.4 and SO206.1 are rejected.

Limited notification clauses

535. I recommend that submissions SO137.35, SO166.18 and SO185.36 are accepted or accepted in part. Rangitāne supports limited notification provisions as notified and the changes I am recommending will not affect this. I agree with the amendment proposed by SO166.18 to MRZ-R20, as this would be consistent with the approach in MRZ-R22 for residential intensification within a certain buffer of the railway corridor which does not meet the required acoustic or ventilation standards. I also agree with the relief sought by SO185.36 to MRZ-R16. This rule includes a limited notification requirement to Rangitāne if a marae is proposed to be established by anyone other than Rangitāne. However, consistent with MRZ-R19, MRZ-R20 and MRZ-R22, limited notification should not be required if written approval is provided.
536. I recommend the following amendments

MRZ-R16 Marae*

...

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

Rangitāne o Manawatū must be limited notified in accordance with section 95A of the Resource Management Act 1991 of an application under this rule if the applicant is an *iwi**, *hapū**, whānau, Māori or other entity other than Rangitāne o Manawatū, unless they provide written approval to the proposal.

MRZ-R20 New buildings or alterations or additions to buildings within 50m of the state highway

...

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991. The New Zealand Transport Agency Waka Kotahi (or its successor) must be given limited notification of an application under this rule unless they have provided written approval.

537. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

Chapter 7B notification provisions

538. There are four submissions on Chapter 7B notification provisions, and one further submission. As notified, the subdivision chapter precluded public notification for any subdivision application. Some applications would also be precluded from limited notification:

- (a) SUB-MRZ-R1.1 – precluded if the subdivision is associated with residential units or papakāinga that are permitted under MRZ-R7 and
- (b) SUB-MRZ-R1.2 – precluded other than in relation to width of a site access and earthworks.

539. Rangitāne o Manawatu (SO137.41) supports retaining the ability for limited notification, primarily because they are concerned about achieving effective stormwater management within the plan change area. Kāinga Ora (FS06.25) opposes (SO137.41) in part as, while they support precluding public notification, they also argue that limited notification should be precluded. As no change is proposed to the notified preclusions for public and limited notification, I recommend accepting SO137.14 and rejecting FS06.25.

540. Kāinga Ora (SO199.10) proposes that where a subdivision is associated with a restricted activity consent granted under MRZ-R8 it should be precluded from limited or public notification. Kāinga Ora (SO199.11 and SO199.12) also proposes that where a subdivision is proposed within the Stormwater Overlay or is a restricted discretionary activity it should be precluded from limited notification. Kāinga Ora argues that limited notification is not a helpful procedure to mitigate

or assess infringements that require a resource consent application, as the reason(s) will be technical in nature with a range of mitigation options available.

541. I do not agree that limited notification should be precluded for applications made in accordance with MRZ-R8, and I note that limited notification can only occur if the tests in s 95B of the RMA are met. There may be an effect on a neighbouring property from subdivision, including in the Stormwater Overlay, and in my view, it is appropriate to include the ability to consider whether the scale of that effect is such that the neighbour should be notified with the opportunity to participate. I therefore recommend that the relief sought in these submissions is rejected.

Q. ISSUE 9: WHETHER THE PROPOSED STANDARDS APPLYING TO RESIDENTIAL INTENSIFICATION ARE APPROPRIATE

542. There are 214 submissions and 20 further submissions on the notified Chapter 10A standards. There are also 15 submissions and three further submissions on the Chapter 10A standards more generally. There are eight submissions on the Chapter 7B standards for subdivision. My analysis groups the submissions according to the relevant standards in each chapter.

Chapter 10A – MRZ

General submissions on standards

543. I addressed SO16.1 and SO16.5 in paragraph 93 as part of several submission points relating to Elmira Avenue and Manapouri Crescent. I address SO182.2 in paragraph 50, as this is a scope issue. I address SO152.1 and FS06.26 in paragraph 82(a).
544. Several submitters seek a requirement for off-street parking and/or garages (SO46.1, SO67.2, SO114.3 and SO182.1). When the NPS-UD come into effect in 2020 it removed the ability for Councils to include objectives, policies or methods to require minimum off-street parking. I therefore recommend rejecting the relief sought by these submitters.
545. Several submitters seek more stringent standards for setbacks and building height and the introduction of a minimum site size (SOSO159.2, SO163.1, SO171.2, SO175.1 and SO179.3). As Mr Burns sets out in paragraphs 19 - 33 of this evidence,
-

the proposed MRZ standards have been extensively tested to determine the appropriate built envelope and amenity controls. I rely on Mr Burns' conclusion that the proposed MRZ standards will allow "*sensible configurations of suitably sized multi-unit developments*", with higher quality outcomes than the MDRS⁸⁰ and I therefore recommend rejecting the relief sought and accepting FS06.27 and FS06.38.

546. Mr Charnley considered the relief sought by SO179.4 in paragraphs 49 – 50 of his evidence. I rely on his evidence that MRZ-S5 and MRZ-S9 appropriately address requirements for greenspace, including by establishing a minimum standard for landscaping. I therefore recommend rejecting this submission.

MRZ-S1 – maximum building height

547. There are 43 submissions to this standard. Three support the standard as notified (Phocus Planning – SO185.45 and Kāinga Ora – SO199.30). SO69.1 supports the standard but seeks amendments. Twenty submitters seek amendments to the standard,⁸¹ and twenty submitters oppose the standard.⁸²
548. I recommend rejecting all relief that seeks to either delete the standard, leave the maximum building height as 9m as in the ODP or to decrease the height control. In making this recommendation, I rely on the evidence of Mr Burns at paragraph 57 of his evidence, where he states that restricting the height of new residential units to, variously, 10m, 9m, 8m or one or two storeys, will not achieve the purpose of the plan change to enable housing intensification. The proposed standards, including building height, were tested extensively by Mr Burns and his

⁸⁰ Statement of Evidence of Andrew Burns, dated 25 July 2025, paragraph 33

⁸¹ **SO32.1** Philip Watkinson; **SO54.1** Mark Patchett; **SO71.1** Julie Griffiths; **SO72.1** Julie Keall; **SO82.1** Lance Keall; **SO88.1** Pam Marks; **SO92.1** Raymond Robinson; **SO96.1** Michael Andrews; **SO105.1** Murray Kidd; **SO113.1** Rory Blatchford; **SO116.32** Kevin and Ngaire Smidt; **SO160.1** Chris Charleston; **SO166.21** Palmerston North City Council; **SO170.1** Leith Consulting; **SO180.1** Richard Houlahan; **SO184.36** Chris Teo-Sherrell; **SO184.37** Chris Teo-Sherrell; **SO184.38** Chris Teo-Sherrell; **SO184.39** Chris Teo-Sherrell; **SO191.32** Robert and Gill Norris

⁸² **SO21.1** Edwin Hoeksema; **SO31.1**, Gavin Casey; **SO34.1**, Daniel Hamid; **SO47.1**, Tania Wilson; **SO51.1**, Kathleen and Rick Field; **SO53.1**, Kim Mckelvey; **SO61.1**, Paul and Michelle Martin; **SO62.1**, Jo-Anne Siegel; **SO70.1**, Anita Sciascia; **SO74.2**, Karen Wilton; **SO86.1**, Richard Sheehan; **SO91.2**, Wendy Stewart; **SO93.1**, Grant Binns; **SO108.1**, Janet Shepherd; **SO109.1**, Richard Houston; **SO110.1**, Craig Mitchell; **SO120.1**, Lizi Guest; **SO159.1**, John and Margaret Wood; **SO165.1**, Brendon Duncan; **SO207.2**, Mary Pattie

colleagues at McIndoe Urban and his opinion is that the proposed permitted activity height of 11m is appropriate.

549. The purpose of other standards in the proposed chapter, including MRZ-S2 – Height in Relation to Boundary, MRZ-S3 – Setbacks, MRZ-S7 – Outdoor living space and MRZ-S8 – Outlook space, is to manage issues such as sunlight access (including during the winter), outdoor space and privacy. Restricting residential intensification to 'new' areas does not achieve the NPS-UD requirement to enable intensification in areas with good accessibility to a variety of services.
550. There are no existing heritage height controls as suggested by SO165.1 and no heritage areas, as identified in the ODP, within the MRZ, as suggested by SO120.1. I therefore recommend rejecting these submissions.
551. Several submitters (SO32.1, SO47.1, SO51.1 and SO59.1) raised concerns about the impact of taller buildings on existing solar panels. Mr Burns considers this issue at paragraphs 51 - 55 of his evidence. Including describing the outcome of testing he undertook to consider the specific effects of taller buildings on existing solar panels. I rely on his evidence in recommending these submissions are rejected.
552. I acknowledge the concerns raised by SO70.1 regarding building accessibility. The RMA does not address mobility – this is a matter for the Building Act 2004. PC:1 does not require that all residential dwellings are three storeys – there will remain a mix of one, two and three storey dwellings across the zone, providing a variety of housing typologies. I therefore recommend rejecting this submission.
553. Chris Teo-Sherrell sought a variety of amendments to this standard, which I address as follows:
- (a) SO184.36 – relying on Mr Burns' evidence.⁸³ I recommend rejecting the proposed reduction in the 50% exemption for roofs sloping more than 15°. The HIRB controls in MRZ-S2 are the mechanism for ensuring appropriate levels of sunlight, and as Mr Burns has described, these have been subject to extensive testing to determine an appropriate building envelope.

⁸³ Statement of Evidence of Andrew Burns, dated 25 July 2025, paragraph 67

- (b) SO184.37 – In paragraph I recommend changes to the maximum height for garages and accessory buildings, to remove the limitation of 2.8m. This is on the basis that the HIRB recession plane in MRZ-S2 appropriately controls any potential shading effects associated with building height. There is nothing preventing a developer providing for car stacking within a building – if this was proposed as part of a development, I consider the building should still comply with the notified building envelope standards. Accordingly, I recommend accepting the relief sought in part.
- (c) SO184.38 – I recommend rejecting the relief sought in this submission, as features enabled in the exceptions to MRZ-S1 (such as for solar panels, satellite dishes and antennas, or architectural features) do not make any material contribution to increasing shading on adjoining properties.
- (d) SO184.39 – MRZ-S2 is the standard which addresses shading where there are breaches of the HIRB recession plane. Accordingly, I recommend rejecting the request to include a matter of discretion addressing shading effects for MRZ-S1.

554. PNCC (SO166.21), Leith Consulting (SO170.1) and Richard Houlahan (SO180.1) seek the removal of the 2.8m maximum height for garages and accessory buildings. I agree with the submitters that this height restriction is not necessary, as MRZ-S2 will control any shading effects. PNCC (SO166.22) is seeking an amendment to MRZ-S2, which I recommend accepting in part, in paragraph 454. These amendments will mitigate any concerns about accessory buildings being too high on a property boundary. As I am recommending accepting SO166.21, I also recommend accepting FS06.31.

555. As I recommend amendments to MRZ-S1 in response to other submitters, I recommend accepting in part SO185.45 and SO199.30.

556. I recommend the following amendments

1. 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.

~~1. Garages or accessory buildings may not exceed a maximum height of 2.8m above ground level.~~

MRZ-S1 does not apply to:

- Fences and standalone walls ([refer MRZ-M20](#));
- Solar panel and heating components attached to a *building* provided these do not exceed the *height* by more than 500mm; or
- Satellite dishes, antennas*, aerials, flues, architectural or decorative features (e.g. finials and spires) provided that none of these exceed 1m in diameter and do not exceed the height by more than 2 metres measured vertically.

557. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S2 – height in relation to boundary

558. There are 28 submissions on this standard, of which Paul J Moughan (SO33.1), Leith Consulting (SO170.2), Phocus Planning (SO185.46) and Paul Robertson (SO200.1) support as notified. Sixteen submitters seek amendments,⁸⁴ while eight submitters consider the standard should be deleted or the height recession planes kept the same as in the Residential Zone.⁸⁵ Many of the submitters seeking amendments to the standard are in effect seeking the same outcomes as those opposing, i.e. either deleting or reverting to the ODP recession plane requirements.

559. Several submitters raise concerns with non-RMA matters, such as impacts on views and property values – as these are not within PNCC's roles and

⁸⁴ **SO84.1**, Grant Baldwin; **SO85.1**, Stuart N Lange; **SO87.1**, Sharyn Noldan; **SO88.2**, Pam Marks; **SO96.2**, Michael Andrews; **SO116.33**, Kevin and Ngaire Smidt; **SO131.1**, Kathryn Hughes; **SO158.1**, Richard Wilde; **SO161.1**, Lynnette Thurston-Paris; **SO166.22**, Palmerston North City Council; **SO166.23**, Palmerston North City Council; **SO184.40**, Chris Teo-Sherrell; **SO191.33**, Robert and Gill Norris; **SO199.31**, Kāinga Ora; **SO206.1**, John Ireland; **SO214.7**, Gillian Rapson

⁸⁵ **SO81.1**, Jenifer Mark; **SO109.2**, Richard Houston; **SO111.1**, Brent Norrish; **SO114.1**, Susanne Aldrich; **SO157.2**, Pamela Bridewell; **SO176.1**, Kim Mclean; **SO177.1**, Michelle Herbert; **SO193.1**, Sean Monaghan

responsibilities under the RMA, I recommend these submissions are rejected as per the Accept/Reject table in **Appendix 1**.

560. Regarding the submitters seeking amendments, SO166.22 seeks a variety of amendments with the effect of applying a separate recession plan to garages and accessory buildings, along with drafting clarifications about where the HIRB is measured from, and inclusion of an updated figure (SO166.23). Kāinga Ora (SO199.31) opposes the proposed approach in the standard to a more generous HIRB for the front 2/3 of the site and a more restrictive HIRB (equivalent to the ODP) for the remaining 1/3 of the site – they seek application of the more generous HIRB across the entire site. Conversely, Chris Teo-Sherrell (SO184.40) seeks application of a more restrictive HIRB due to concerns about shading and building orientation.
561. Relying on the evidence of Andrew Burns (at paragraph 71), I recommend rejecting SO199.31 and SO184.40 – the proposed HIRB as notified was subject to comprehensive testing which demonstrated that it is fit for purpose. As a Tier 2 local authority, PNCC is not required to adopt the MDRS, and it has chosen a more nuanced approach to identifying a permitted activity recession plane.
562. Subject to minor drafting amendments, I recommend accepting SO166.22 as the changes will improve standard interpretation and provide more location flexibility for accessory buildings and detached garages. Accordingly, I recommend rejecting FS06.32.
563. I recommend rejecting all submissions seeking the deletion of the standard or reversion to the ODP provisions in the Residential Zone. The HIRB standard has been extensively tested by McIndoe Urban and the proposed recession planes are appropriate to enable residential intensification while managing potential loss of shading. Retaining appropriate levels of privacy is addressed via MRZ-S8 – Outlook space.
564. I recommend the following amendments

1. All *buildings and structures* (excluding accessory buildings) 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 and perpendicular to the boundary, 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* and perpendicular to the boundary, for the remainder of the site.
2. Accessory buildings (including detached garages) must be contained beneath a 45° recession plane measured from a point 2.8 metres above ground level and perpendicular to the boundary.
- ...
3. 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* and perpendicular to the boundary ~~inclined inwards at right angles~~.
- ...

565. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:l. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S3 – Setbacks

566. There are 18 submissions to this standard, of which 14 seek amendments⁸⁶ and four oppose (Brent Norrish – SO111.2, Richard Houston – SO109.3, Sheila Barrass – SO186.1 and Wendy Stewart – SO91.1). All opposing submitters want the standard deleted or the side yard increased. There are four further submissions - FS01.2 supports SO78.5 while FS06.10 opposes the relief sought by this submitter. FS06.36 supports SO170.3, while FS01.5 supports SO166.36. Chris-Teo-Sherrell submitted on MRZ-R5, seeking an increase in the distance between a garage and front property boundary from 5.5m to 6.5m (SO184.34) – I consider this relief as part of my assessment of submissions on MRZ-S3 where this distance is set.

567. The Fuel Companies (SO78.5) are seeking the inclusion of a fifth matter of discretion, to require consideration of reverse sensitivity effects on adjoining non-residential sites. As stated in paragraphs 213 - 219 of this report, I agree that PC:l should refer to reverse sensitivity effects and I have recommended amendments to MRZ-O5 and MRZ-P11 to this effect. In my opinion the amendment as sought

⁸⁶ **SO78.5**, BP, Mobil and Z Energy (The Fuel Companies); **SO184.41**, Chris Teo-Sherrell; **SO184.42**, Chris Teo-Sherrell; **SO184.43**, Chris Teo-Sherrell; **SO214.6**, Gillian Rapson; **SO104.2**, Hern Teo-Sherrell; **SO199.32**, Kāinga Ora; **SO116.34**, Kevin and Ngaire Smidt; **SO170.3**, Leith Consulting; **SO166.24**, Palmerston North City Council; **SO166.25**, Palmerston North City Council; **SO166.26**, Palmerston North City Council; **SO185.47**, Phocus Planning; **SO191.34**, Robert and Gill Norris

by SO78.5 to MRZ-S3 is also appropriate as the primary reverse sensitivity effects of concern (noise and lighting) are a function of how close new development is to an existing non-residential use, and this is controlled via setbacks.

568. To be consistent with my recommendations on MRZ-O5 and MRZ-P11,⁸⁷ however, I consider The Fuel Companies' proposed wording should be amended to refer to 'reverse sensitivity effects on existing lawfully established non-residential uses'. Accordingly, I recommend accepting in part SO78.5 and FS01.2. I also recommend accepting in part FS06.10 insofar as I agree there are appropriate standards for new non-residential activities. The focus of the standard is on protecting lawfully established existing non-residential activities which may have existing use rights for effects that are greater than would be allowed by current or future district plan standards.
569. Relying on the evidence of Mr Burns (at paragraph 80), I recommend rejecting all relief seeking either deletion of the standard or an increase in setbacks from the side or rear boundary.
570. In terms of the amendments sought by submitters:
- (a) I recommend accepting SO170.3 and SO185.47 and accepting in part SO166.24 in relation to introducing a minimum rear yard setback requirement. This is supported by Mr Burns.⁸⁸
 - (b) I recommend accepting in part SO166.24 insofar as it relates to deleting the reference in MRZ-S3.1 to the requirement for corner sites, clarifying the requirements for front yard minimum depths and adding a requirement for a 1m rear yard. Accordingly, I recommend accepting in part SO184.41 as there is no longer a reference to 'primary'.
 - (c) I recommend accepting in part SO166.25 insofar as it relates to the deletion of the table in MRZ-S3.2, and the deletion of the requirement for a 2.5m minimum setback where there is no parking in front of a garage. While Mr Burns supports retaining this requirement from an urban design perspective (paragraph 83), I prefer Ms Fraser's safety-based evidence⁸⁹

⁸⁷ Paragraphs 186 - 188

⁸⁸ Statement of Evidence of Andrew Burns, dated 25 July 2025, paragraph 87(d)

⁸⁹ Statement of evidence of Harriet Fraser, dated 25 July 2025, Table 2, row 6

that the 5.5m minimum parking depth should apply regardless of garage presence. I recommend combining this into MRZ-S3.1. However, following Mr Burns' evidence (paragraphs 84 - 85), I do not agree with deletion of the exception for a garage to be located on the boundary provided it is seven (7) metres long or less. I propose this requirement is transferred into MRZ-S3.1 and therefore recommend accepting in part SO184.41 insofar as this submission relates to having a zero side yard for some buildings.

- (d) I recommend accepting in part SO166.26 – the inclusion of a HIRB requirement for accessory buildings, in MRZ-S2 provides an appropriate control from an effects perspective, for accessory buildings. However, the reference to eaves greater than 600m wide, in the exclusions, should be deleted as this was included in a drafting error. As a result, I recommend accepting SO116.34 and SO191.34.
- (e) Ms Fraser considers that 5.5m is an appropriate distance where parking is proposed in the front yard of a residential unit, as this encompasses the 85th and 95th percentile car lengths.⁹⁰ I therefore recommend rejecting SO184.34, SO184.41 and SO184.42 insofar as they relate to seeking an increase in the set-back of a garage from 5.5m to 6.5m.
- (f) I recommend rejecting SO184.43 – there is no issue with side entry garages provided they have an appropriate setback and safe egress and ingress, which is managed by MRZ-S17. MRZ-S12 ensures there would be an appropriate quantum of glazing and MRZ-S9 sets the standard for permeable surfaces – this must be met regardless of the location of any garage.
- (g) Relying on the evidence of Mr Burns,⁹¹ I recommend accepting SO199.32 in part, insofar as it relates to deletion of matter of discretion 1. I agree with Mr Burns' reasoning for retaining matter of discretion 2.
- (h) I recommend accepting SO214.16 as there is a requirement for open spaces between buildings, i.e. side and rear yards. A side yard is not required where there is an existing or proposed common wall.

⁹⁰ Statement of evidence of Harriet Fraser, dated 25 July 2025, Table 1, row 7

⁹¹ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraphs 94 - 95

571. I recommend the following amendments:

MRZ-S3		Setbacks										
<p>1. Any <i>building</i> must be set back from the relevant boundary by the minimum depth listed in the following Yards table. For a corner site* with frontages to two public roads, the front yard requirement applies to the primary frontage.</p> <table border="1"> <thead> <tr> <th>Yard</th> <th>Minimum Depth</th> </tr> </thead> <tbody> <tr> <td>Front</td> <td>1.5 metres from a public road for sites with no direct vehicle access to that road where there is no parking in the front yard <u>1.5 metres from a garage (internal or standalone).</u></td> </tr> <tr> <td>Front</td> <td>5.5 metres for that part of the frontage where a parking space is provided in front of the residential unit or a detached garage is at 90 degrees to the street frontage but no garage (internal or standalone).</td> </tr> <tr> <td>Side and rear</td> <td>1 metre</td> </tr> <tr> <td>Side and rear</td> <td><u>0 metres for the first 7 metres of a garage, whether detached or integrated into the residential unit, provided that that part of the garage within 1m from the side or rear boundary is contained beneath a 45° recession plane measured from a point 2.8 metres above ground level and perpendicular to the boundary.</u> <u>1 metre for that part of a garage (whether detached or integrated into the residential unit) which is longer than 7 metres</u></td> </tr> </tbody> </table> <p>2. A front-facing garage must be set back in accordance with the following Garage Setback table</p>		Yard	Minimum Depth	Front	1.5 metres from a public road for sites with no direct vehicle access to that road where there is no parking in the front yard <u>1.5 metres from a garage (internal or standalone).</u>	Front	5.5 metres for that part of the frontage where a parking space is provided in front of the residential unit or a detached garage is at 90 degrees to the street frontage but no garage (internal or standalone).	Side and rear	1 metre	Side and rear	<u>0 metres for the first 7 metres of a garage, whether detached or integrated into the residential unit, provided that that part of the garage within 1m from the side or rear boundary is contained beneath a 45° recession plane measured from a point 2.8 metres above ground level and perpendicular to the boundary.</u> <u>1 metre for that part of a garage (whether detached or integrated into the residential unit) which is longer than 7 metres</u>	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> 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. 5. <u>Reverse sensitivity effects on existing, lawfully established, non-residential activities</u>
Yard	Minimum Depth											
Front	1.5 metres from a public road for sites with no direct vehicle access to that road where there is no parking in the front yard <u>1.5 metres from a garage (internal or standalone).</u>											
Front	5.5 metres for that part of the frontage where a parking space is provided in front of the residential unit or a detached garage is at 90 degrees to the street frontage but no garage (internal or standalone).											
Side and rear	1 metre											
Side and rear	<u>0 metres for the first 7 metres of a garage, whether detached or integrated into the residential unit, provided that that part of the garage within 1m from the side or rear boundary is contained beneath a 45° recession plane measured from a point 2.8 metres above ground level and perpendicular to the boundary.</u> <u>1 metre for that part of a garage (whether detached or integrated into the residential unit) which is longer than 7 metres</u>											

Boundary	Depth
With public road, where no parking is provided in front of the garage	2.5 metres
With public road where parking is provided in front of garage	At least 5.5 metres
Side and rear	1 metre for that part of a garage which is longer than 7 metres

3. A side entry garage must be set back a minimum of 1.5 metres from a boundary fronting a public road.

MRZ-S3 does not apply to:

- Accessory buildings located in the side or rear yards.
- Site boundaries where there is an existing or proposed common wall.
- Fences or standalone walls.
- Uncovered deck and uncovered structures no more than 1 metre in height above ground level.
- Eaves up to 600 mm wide. ~~For eaves wider than 600mm only the additional width beyond 600mm is included in the site coverage calculation.~~

572. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S4 – Building coverage

573. There are eight submissions to this standard all of which either support the standard as notified or seek amendments. There are no submitters seeking deletion.

574. The Fuel Companies (SO78.5) seeks the inclusion of a fifth matter of discretion that would require consideration of reverse sensitivity effects on adjoining non-residential sites. This is supported by FS01.2 and opposed by FS06.11. Generally, I consider the potential for reverse sensitivity effects arises from proximity rather than the size of a building and this is managed through MRZ-S3 – Setbacks. However, I acknowledge there is a potential loss of privacy that may arise if building covered exceeds 50% and the building façade is brought closer to the boundary with an existing, lawfully-established non-residential activity. While I do not agree that a new matter of discretion is required, I recommend amending notified matter of discretion 3, to remove the reference to adjoining residential sites. This would enable an appropriate consideration at the time a resource consent is made, and it is consistent with the similar matter of discretion in MRZ-S8 – Outlook Space. I therefore recommend accepting in part SO78.1 and FS01.2. I also recommending accepting FS06.11.
575. Kevin and Ngaire Smidt (SO116.35) and Robert and Gill Norris (SO191.35) consider all impermeable structures, covered or uncovered, should be included in the 50% maximum covered requirement. This would include decks. The standard already applies to all buildings, which includes anything that is partially or fully roofed.⁹² Decking is also technical permeable as it is not a solid surface – water still permeates through the spaces between the decking material. The combination of this standard and the requirement for a minimum of 30% permeable surfaces in MRZ-S9 will appropriate manage this issue. Accordingly, I consider amendments are not required to this standard.
576. Chris Teo-Sherrell (SO184.44) seeks the inclusion of text to reinforce that the standard applies to all buildings. I agree this is a useful drafting addition and I therefore recommend accepting the relief sought.
577. Sheila Barras (SO186.5) seeks that the existing building coverage is taken into account so houses can be built in the centre of a section. The standard as notified applies to all buildings on a site, including any existing. There is nothing requiring new buildings to be built in any particular part of a site. The relevant requirement is in MRZ-S3 for minimum setbacks. Amendments are not required to

⁹² See definition of 'building' in Chapter 4A, notified as part of PC:I.

the standard in response to this submission and I therefore recommend it is rejected.

578. Kāinga Ora (SO199.3) seeks the deletion of matters of discretion 2 and 3, for shading and loss of privacy. I rely on Mr Burns' opinion that these matters of discretion remain relevant, in part because of the potential for cumulative effects.⁹³ I therefore recommend the relief sought is rejected.

579. As I am recommended amendments to the standard, I recommend accepting in part SO170.4 and SO185.4.

580. I recommend the following amendments

<p>1. Maximum <i>building coverage of all buildings on a site</i> must not exceed 50% of the <i>net site area</i>.</p> <p>MRZ-S4 does not apply to:</p> <ul style="list-style-type: none"> • Uncovered deck and uncovered <i>structures</i> no more than 1 metre in <i>height</i> above <i>ground level</i>. • Eaves up to 600 mm wide. For eaves wider than 600mm only the additional width beyond 600mm is included in the <i>site coverage</i> calculation. 	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> 1. The <i>effects</i> of increased <i>building coverage</i> on <i>stormwater discharges</i> from the <i>site</i> and flows; 2. Shading <i>effects</i> on adjoining <i>sites</i>; 3. Loss of privacy <i>effects</i> on <i>adjoining residential sites</i>; and 4. Dominance <i>effects</i> on adjoining residential sites.
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581. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S5 – Landscaped area

582. There are 12 submissions on this standard. David Lane (SO164.5) and Gillian Rapson (SO214.9) oppose the standard – SO164.5 seeks deletion as he does not support mandating trees while SO214.9 is concerned about loss of views and

⁹³ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 100

maintenance. The remaining submitters⁹⁴ seek a variety of amendments which can be grouped as concerns about the requirement for specimen trees and size requirements, requests to increase the landscaping percentage to 30% and increases to the front yard requirement to 50%, and concerns over the potential for vegetation in a front yard to obscure visibility.

583. ODP rule R6.3.6.1 permits earthworks up to 500m² in the Residential Zone (and the MRZ by virtue of a consequential amendment introduced via PC:I), and this could result in the loss of all vegetation on a site. I understand from Mr Mori and Mr Charnley that a common approach of residential developers in Palmerston North is to clear a site as a permitted activity and then apply for any required resource consents. Mr Charnley highlights this as a landscape issue at paragraph 45 of his evidence, and he therefore considers it appropriate that replacement vegetation is more than grass, to provide a degree of scale and variation.
584. The standard does not specify anything other than the height and location of the tree – the choice of variety remains with the owner. I agree with Mr Charnley's evidence and therefore recommend rejecting the relevant submissions, as per the Accept/Reject table in **Appendix 1**. Retaining a requirement for a specimen tree also assists with increasing climate change resilience (as required by NPS-UD Policy 1((f)) and it addresses the outcomes sought by MRS-S6 in terms of shade and mitigating the projected increase in hot days and the urban heat island effect (see paragraphs - 578).
585. I agree with Mr Charnley's reasons that an increase in the minimum landscape area, from 20% to 30%, is not appropriate, and there is no benefit in increasing the metric for landscaping in the front yard from 30% to 50% (SO184.45 and SO184.46).⁹⁵ Mr Burns' considers the relief sought by SO184.47, to require that vegetation does not interrupt the visual connection between front façade windows and doors, would reduce street character and on-site liveability.⁹⁶ I therefore recommend that SO184.47 is rejected.

⁹⁴ **SO116.36**, Kevin and Ngaire Smidt; **SO137.29**, Rangitāne o Manawatū; **SO166.27**, Palmerston North City Council; **SO170.5**, Leith Consulting; **SO184.45**, Chris Teo-Sherrell; **SO184.46**, Chris Teo-Sherrell; **SO184.47**, Chris Teo-Sherrell; **SO185.49**, Phocus Planning; **SO191.36**, Robert and Gill Norris; **SO199.34**, Kāinga Ora

⁹⁵ Statement of evidence of David Charnley, dated 25 July 2025, paragraphs 50 - 52

⁹⁶ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 103

586. I agree that landscaping provides benefits as identified by Rangitāne (SO137.29) and consider that these could be included as part of matter of discretion 2, rather than a separate matter.

587. I agree with the amendments sought by SO166.37, to clarify drafting, and SO170.5, to increase the number of years before the minimum specific tree height is achieved (and this is supported by Mr Charnley).⁹⁷ These will improve interpretation of the standard and consistency with the Landscape report recommendations. Increasing the number of years from five to ten will also enable the use of slower-growing varieties. I recommend rejecting FS01.6 to SO166.37. The standard requires the tree to be located in the front yard only when the outdoor living space is located in the front yard. The standard does not require that specimen trees are only located in the front yard.

588. I recommend the following amendments:

<ol style="list-style-type: none"> 1. A ground floor <i>residential unit, papakāinga*</i> or <i>community house*</i> must have a landscaped area of grass and/or plants covering at least 20% of the <i>site</i>; 2. Where a <i>site</i> fronts a public <i>road</i>, at least 30% of the required landscaped area must be located in the front yard, for a depth of at least 1m; 3. At least one specimen tree capable of growing to a minimum <i>height</i> of four metres after five <u>ten</u> years must be provided for each ground floor <i>residential unit, papakāinga*</i> or <i>community house*</i>. 4. The specimen tree must be located in the <i>outdoor living space</i> required by MRZ-S7(2) where this is provided at the street frontage <u>located in the front yard</u> of a <i>residential unit, papakāinga*</i> or <i>community house*</i>. 	<p>Matters of discretion if the standard is infringed:</p> <ol style="list-style-type: none"> 1. <i>Effect</i> of increased hard standing on visual amenity; 2. The contribution of landscaping to visual interest, <u>stormwater management, shade and habitat</u>; and 3. Integration of landscaping and <i>building</i> and <i>access*</i> design.
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589. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan

⁹⁷ Statement of evidence of David Charnley, dated 25 July 2025, paragraph 63

provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S6 – Shade

590. There are six submissions on this standard and one further submission. All except for two request deletion. Rangitāne (SO137.30) seeks that its retention as notified. Chris Teo-Sherrell (SO184.48) seeks amendments to rectify a perceived conflict in the drafting.
591. Council's climate change advisor Mr Watson sets out the climate change parameters applying to Palmerston North in the [Climate Change Report](#) which formed part of the evidence base for the s 32 report. As set out in Table 1, by 2030 there will be an average of seven more days over 25°C, and more than 16 days by 2050. As the number of hot days increases so too does the urban heat island effect, where buildings and hard surfaces retain more heat during the day than they release at night. This results in a cumulative increase in temperature. As a consequence, air temperatures remain higher for longer, which can then require more cooling. There are public health, energy use and infrastructure maintenance consequences of the urban heat island effect.
592. I accept Mr Watson's advice that the outcomes of MRZ-S6 are required to mitigate the likely impacts of climate change, the urban heat island effect and to increase resilience in Palmerston North's urban areas.⁹⁸ If the standard is deleted as sought by PNCC and other submitters, the outcome sought by the standard (to reduce the urban heat island effect), would need to be achieved using other mechanisms. Mr Watson has suggested one way to achieve this is an amendment to MRZ-S5, to require that the canopy of each specimen tree is 2.5m wide. He considers this would provide approximately 15m² of shade per dwelling by year 4, that could increase over time to reach up to 25m² by 2090.⁹⁹ If a deciduous tree is chosen, this also has the benefit of allowing solar heating during the cooler months. However, this would potentially conflict with the preference in MRZ-P12 for indigenous vegetation, which are primarily evergreen.

⁹⁸ Statement of evidence of David Watson, dated 25 July 2025, paragraph 33

⁹⁹ *Ibid*, paragraph 34

593. As notified, MRZ-S5 requires a specimen tree of a certain height for each new dwelling. Although I have recommended amendments to this standard (see paragraph 567), I have maintained the specimen tree requirement. I acknowledge Mr Watson's concern that, absent a canopy requirement, specimen trees may fail to provide adequate shade during periods of greatest need.
594. Sources of shade for an individual site vary and can include buildings on the site and adjacent properties, on site vegetation (including trees), car ports, pergolas, and street trees. I understand from Mr Watson that creating shade to mitigate the urban heat island effect should operate at a neighbourhood level, through a combination of actions in both public and private realms. I understand from Mr Charnley that the Council is reviewing its 2016 Vegetation Framework. This framework currently excludes any significant mention of shade and is silent on the urban heat island effect and the opportunity for public realm trees to provide shade and reduce heat.
595. It is clear that a range of non-regulatory methods are available to address this issue. I consider the District Plan also has a role to play, particularly given the expected increase in building coverage arising from residential intensification and the NPS-UD Policy 1 direction that well-functioning urban environments include homes that are resilient to the likely current and future effects of climate change. I recognise, however, the concerns raised by submitters about how shade is provided, and I acknowledge there are options for this beyond the requirements of the notified standard.
596. I also note Mr Burns' support for deleting standard, on the basis there are requirements in MRZ-P3 and MRZ-S7 regarding access to sunlight and a specific requirement for shade could conflict with these.¹⁰⁰
597. I have considered whether to retain MRZ-S6 and how to achieve its outcomes if deleted. Given limited submission scope, challenges with achieving a particular canopy spread, and potentially conflicts with other MRZ provisions, I consider that non-regulatory methods are more appropriate than this standard.

¹⁰⁰ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 104

598. I encourage the Council to consider non-regulatory guidance about addressing the urban heat island effects during development, including a reference to the contribution trees make to providing shade in any landscaping guidance. As the Vegetation Framework is updated, this may be a good opportunity to consider those areas of the city where greater shade may be required, and how the public realm can contribute to minimising these effects.

599. On the basis of the above analysis, I recommend accepting the relief sought to delete the standard (including) and.33) and rejecting the relief to retain or amend the standard, as set out in the Accept/Reject table in **Appendix 1**. In recommending deletion of MRZ-S6, I am also recommending deleting the references in MRZ-R7, MRZ-R9, MRZ-R13 and MRZ-R16.

600. I recommend the following amendments:

MRZ-S6 — Shade	
<p>1. Every residential unit, papakāinga* or community house* must be provided with an outdoor space which is shaded between December and March.</p> <p>2. Where the shaded outdoor space is provided at ground level, at midday it must provide:</p> <p>a. a minimum area of 15m² for a residential unit, papakāinga* or community house* with two or more bedrooms; or</p> <p>b. a minimum area of 10m² for a residential unit, papakāinga* or community house* with one bedroom.</p> <p>603.</p> <p>3. Where the shaded outdoor space is provided above ground level, or the residential unit or papakāinga* is a ground floor apartment, at midday it must provide:</p> <p>a. a minimum area of 2.5m² for a one bedroom residential unit or community house*; or</p> <p>b. a minimum area of 4m² for a two or more bedroom residential unit or community house*.</p>	<p>Matters of discretion if the standard is infringed:</p> <p>1. Whether a proposed alternative solution for shading will achieve the same outcome within a reasonable timeframe.</p>

Advice Note: Where a tree is the mechanism to provide shade, the mature canopy size at year four can be used to determine the minimum area.	
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605. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S7 – outdoor living space

606. There are four submissions to this standard, three of which seek amendments (Kate Vandermeer, SO14.1; Leith Consulting, SO170.7 and Chris Teo-Sherrell, SO184.49). Phocus Planning (SO185.51) supports and suggests clarifying the definition of a ground floor apartment. There are two further submissions – FS06.1 and FS06.37.

607. I rely on the evidence of Mr Burns (at paragraph 107) to recommend accepting SO170.7 (and hence FS06.37), to increase the requirement for outdoor living space from two to three bedrooms in MRZ-S7(2)(a) and from one to two bedrooms in MRZ-S7(2)(b).

608. While I am sympathetic to the relief sought by SO14.1, pet ownership is not an RMA matter. I agree with Mr Burns (at paragraph 108) who notes that the standard is a minimum, which means there will be properties with larger outdoor spaces to benefit pets. I therefore recommend rejecting this submission and accepting FS06.1.

609. Chris Teo-Sherrell (SO184.49) seeks modification of this standard to require that outdoor living space is distributed over multiple levels for multi-storey dwellings. Mr Burns does not support this approach.¹⁰¹ and, relying on his evidence, I recommend rejecting the relief sought.

610. I do not agree with SO185.51 that clarification is required about a ground floor apartment, as a ground floor apartment is simply a dwelling located on the ground floor. I therefore recommend rejecting the relief sought in this submission.

¹⁰¹ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 109

611. I recommend the following amendments

...	
2.	Where the <i>outdoor living space</i> is provided at <i>ground level</i> it must provide:
a.	a minimum area of 30m ² which can accommodate a 4.5 metre diameter circle for a <i>residential unit or community house*</i> with two <u>three</u> or more bedrooms; or
b.	a minimum area of 20m ² which can accommodate a 4 metre diameter circle for a <i>residential unit or community house*</i> with one bedroom <u>up to two bedrooms</u> ; and
c.	a gradient no greater than 1 in 20.
...	

612. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

613. **MRZ-S8 – outlook space** – there are five submissions on this standard, all seeking amendments.

614. I recommend accepting the drafting clarifications sought by SO166.29 as they will result in correct cross referencing. I recommend accepting in part SO184.50 insofar as it relates to the text “MRZ-S9 does not apply ...”. This text should be at part 3 of the standard – outlook space may include deck balustrades, pergolas etc. The observer distance from a window is not relevant, as MRZ-Figure 3 shows where measurements are taken from.

615. I rely on Mr Burns' evidence at paragraphs 120 – 121 that reducing the outlook space for main living areas and primary bedrooms from 3m x 3m to 1m x 1m (as sought by SO170.8 and SO199.36) will lead to poor outcomes for future occupants. Mr Burns notes that McIndoe Urban has shown that the notified standard provides appropriate privacy and outlook for residential intensification.

616. As a Tier 2 local authority, PNCC is not required to implement the MDRS and can determine what is appropriate for Palmerston North. I note Mr Burns' opinion that conflating the outlook standard with the outdoor living space ignores their

different purposes (paragraph 112(d)). I therefore recommend rejecting the relief sought by these submitters.

617. I recommend rejecting the relief sought by SO185.52 to delete the standard as being overly complex to comply/enforce. The requirement for outlook space is based on the MDRS – if the MDRS are considered enforceable then a similar standard must also be enforceable. There is no conflict with the yard setbacks, and this is confirmed by Mr Burns.¹⁰²

618. In responding to the relief sought by the submitters, Mr Burns and I have identified a minor clarifying amendment to the standard – the addition of 'and any additional windows in the main living area and/or primary bedroom' to 1(c).¹⁰³ This text clarifies that the outlook space for the main living area and the primary bedroom in 1(a) and 1(b) applies to one window only.

619. I recommend the following amendments

1. An outlook space must be provided for every *residential unit, papakāinga** or *community house** which meets the following minimum dimensions (measured from the centre point of the applicable window):

- a. 6 metres in depth x 4 metres in width outlook space for a *main living area*; and
- b. 3 metres in depth x 3 metres in width outlook space for the primary bedroom; and
- c. 1 metre in depth x 1 metre in width outlook space for all other *habitable rooms* and any additional windows in the main living area and/or primary bedroom.

...

3. Outlook space may

- a. extend over a public *road, public open space** or driveways and footpaths within the *site*;
- b. extend over another outlook space required within the same *residential unit* or *community house**; ~~or~~
- c. be under or over a balcony; or
- d. Include deck balustrades, pergolas, verandas, porches and other building overhangs.

~~MRZ-S9 does not apply to:~~

~~• Deck balustrades, pergolas, verandas, porches and other building overhangs.~~

See MRZ-Figure 43 below which demonstrates the required outlook space.

MRZ-Figure 43 Diagram showing outlook space

¹⁰² Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 110

¹⁰³ *Ibid*, paragraphs 122 - 123

620. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S9 – permeable surfaces

621. There are six submissions to this standard, three of which support the standard as notified and three of which seek amendments. There is one further submission.

622. Relying on the evidence of Ms Wood, at paragraph 85, and in response to Rangitāne (SO137.31), I recommend removing the reference to permeable paving as an acceptable permeable surface. Following a pre-hearing meeting with Rangitāne, I understand this will address their concern about maintenance. I therefore recommend accepting SO137.31. Kāinga Ora (FS06.23) sought for SO137.31 to be rejected, as they do not agree there should be explicit direction in the District Plan for maintenance or monitoring of first flush. As my recommended amendment to MRZ-S9 is to remove the reference to permeable paving, I recommend accepting FS06.23.

623. Relying on Ms Wood's evidence, at paragraph 86, I recommend rejecting the relief sought by Hern Teo-Sherrell (SO104.6) and Chris Teo-Sherrell (SO184.51) as Ms Wood considers a requirement for 30% of a site to be in permeable surfaces to be an appropriate metric.

624. As I have recommended a drafting amendment to MRS-S9, I recommend accepting in part the submissions seeking retention of the standard as notified (SO170.9, SO185.53 and SPO210.12)

625. I recommend the following amendments

1. Every *site* must contain a minimum 30% *permeable surfaces**, as a percentage of the *net site area*.

Advice Note:

*Permeable surfaces** can include:

- Interlocking PVS cellular systems with loose aggregates.

- ~~permeable paving – see Auckland Council 'Permeable Pavement Construction Guide'~~.
- landscape planting and grassed areas.
- decks provided the surface material allows water to drain directly through to a permeable surface*.

626. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S10 – Stormwater attenuation device

627. There are eight submissions to this standard; three which seek amendments and five which support the notified drafting.

628. During pre-hearing discussions with Rangitāne, Ms Wood and I discussed MRZ-S10 in relation to this submission point (SO137.32). As a result of those discussions, I recommend amendments to this standard to require that stormwater attenuation tanks are not to be used for rainwater harvesting, as this would undermine their effectiveness, and to include an Advice Note that refers to Council's existing Stormwater Attenuation Design Guide. We also agreed there would not be a reference to the new policy sought by Rangitāne in SO137.15 (see paragraph 260 for my analysis and recommendation on this submission point).

629. I note David Lane's (SO164.1) support for the standard and his comment that there should be one set of stormwater attenuation rules across the city. Applying these rules to areas outside of the MRZ is out of scope of PC:I. Annette Nixon (SO178.4) questions whether there are likely to be other stormwater controls or rainwater collection for other use. As notified, Policy MRZ-P8 requires incorporation of water sensitive design, which could include swales or rainwater collection where four or more new dwellings are proposed, MRZ-R24 requires stormwater treatment for areas of carparking and MRZ-S9 requires a minimum area of permeable surfacing. These are all 'other stormwater controls' as referenced by the submitter.

630. With regard to SO199.37, I accept Mr Burns' advice that enabling above-ground attenuation tanks in a front yard, provided they were screened, would be inconsistent with the built environment outcomes sought for the MRZ.¹⁰⁴ Accordingly, I recommend rejecting the relief sought by Kāinga Ora.
631. Phocus Planning (SO185.54) raises concerns about potential rule conflicts and whether the rule would require a resource consent for very minor activities, such as constructing a garden path. I consider these concerns do not apply to MRZ-S10, as this standard does not establish activity status – rules perform that function. The submitter's concern appears to relate to MRZ-R10, which I address at paragraph 392 when considering SO185.29. Accordingly, I recommend rejecting SO185.54.
632. As I have recommended amendments to MRZ-S10, I recommend accepting in part SO164.1, SO170.10, SO178.4, SO184.52 and SO210.13.
633. I recommend the following amendments

1. Every *site* must include a *stormwater* attenuation device which is sized to contain a minimum 18 litres of water per 1m² of new impervious area.
2. Each *stormwater* attenuation device must be maintained on an ongoing basis.
3. Any above-ground *stormwater* attenuation tank must be located in a side or rear yard.
4. [Stormwater attenuation tanks must not be used for rainwater harvesting](#)

Advice Note

[PNCC's Stormwater Attenuation Design Guide provides guidance for stormwater attenuation tanks, including maintenance requirements](#)

634. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S11 – Minimum floor levels

¹⁰⁴ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 117

635. There are eight submissions to this standard. One submission seeks deletion, four submissions seek amendments and three seek retention as notified. There is one further submission.
636. Ms Wood considers the relief sought by submitters to this standard in paragraphs –94 - 101 of her evidence. Based on her conclusions I recommend accepting the relief sought by PNCC (SO166.30) as the proposed amendments would clarify drafting issues, providing specificity about the standard applying to minimum floor levels. Accepting this relief also requires a consequential amendment to the matter of discretion to remove the reference to 'ground levels'.
637. Leith Consulting (SO170.11) seeks deletion of the standard, on the basis that there is insufficient evidence to support the recommended minimum floor level standard of 2% AEP (1 in 50 year ARI). Ms Wood considers the level of detail in the modelling underpinning PC:I is appropriate for the plan change, and that there is sufficient evidence on this basis. The proposed AEP in the standard is based on the NZ Building Code, NZ Standard 4404 Land Development and Subdivision Infrastructure and the Council's own Engineering Standards, which were most recently updated in March 2025. I therefore recommend rejecting the relief sought by this submission.
638. Regarding SO210.14 (supported by FS03.5), I recommend accepting relief to include reference to SSP5-8.5 (accepting FS03.5 in part). This is based on Mr Watson's evidence at paragraph 32, notwithstanding that Ms Wood's evidence indicates RCP 6.0 remains appropriate given that sensitivity testing showed no significant difference in flood extent between climate scenarios.¹⁰⁵
639. On whether the standard should refer to 2% Annual Exceedance Probability (AEP) or 1% AEP as sought by SO210.14, I accept Ms Wood's evidence (paragraphs 103 - 106) that the notified requirement is appropriate and should not be changed. The 2% AEP provides a minimum baseline, with Council requiring minimum floors levels to be set at the 1% AEP where necessary. This is already reflected in the notified drafting, which refers to the floor level being “*at least at the required freeboard ...*”.

¹⁰⁵ Statement of evidence of Mary Wood, dated 25 July 2025, paragraph 102

640. With regard to SO214.5, I recommend accepting this submission in part, insofar as the standard already requires all new dwellings in the MRZ to achieve the minimum floor level in the standard. Introducing a requirement for wooden floors is outside the scope of the Council's roles and responsibilities under the RMA.

641. As I am proposed amendments to MRZ-S11, I recommend accepting in part those submissions seeking retention as notified, as per the Accept/Reject table in **Appendix 1**.

642. I recommend the following amendments

<p>1. The <u>minimum floor level</u> (finished floor) <u>and ground level</u> for all <u>residential buildings, accessory buildings and structures</u> must be at least at the required freeboard for the 2% AEP flood extent for the site (including an allowance for climate change <u>using climate change scenario SSP5-8.5</u>).</p> <p>2. Access* to occupied <i>buildings and structures</i> must be above the 2% AEP flood extent.</p> <p>Advice Note: The required freeboard <u>minimum floor level</u> will be provided by Palmerston North City Council.</p>	<p>Matters of discretion where the standard is infringed:</p> <p>1. The effect on the site and on upstream and downstream properties of <u>minimum floor levels and ground levels</u> which are below the required standards.</p>
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643. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S12 – Front façade glazing

644. There are four submissions to this standard – Leith Consulting (SO170.12) and Chris Teo-Sherrell (SO184.54) support retention as notified, while PNCC (SDO166.31) and Phocus Planning (SO185.66) seek amendments.

645. The amendments sought by PNCC are intended to assist with interpretation for plan users. They do not change the underlying requirements for a certain percentage of glazing in different circumstances. I have reviewed these amendments and agree they will clarify interpretation of the standard. I therefore

recommend accepting the relief sought by SO166.31. PNCC has also identified several cross-referencing errors, which I agree require correcting.

646. In McIndoe Urban's [PNCC MRZ Standards Report](#) (prepared to support development of the MRZ standards), they recommended a front façade glazing standard,¹⁰⁶ that would apply to all dwelling types within the MRZ, rather than all buildings. I therefore agree with the concern identified in SO185.66, that the notified drafting for MRZ-S12 would unintentionally capture all buildings, including small garden sheds and non-residential buildings. I recommend accepting the relief sought by SO185.66 and replacing 'building' with 'residential unit'. This will reconcile the drafting with McIndoe Urban's original recommendation.

647. As I have recommended amendments to MRZ-S12 in response to submissions, I recommend accepting in part the relief sought by SO170.12 and SO184.54.

648. I recommend the following amendments:

Amend MRZ-S12	
1. Any building <u>residential unit</u> must meet the following minimum façade glazing requirements:	
Street-facing Front façade facing a street	20% glazing as windows and doors
For any corner site or a site that has frontage to two streets Side boundary façade Secondary frontage for a corner site* OR side façade fronting street	<u>One street facing facade 20% as windows and/or doors</u> <u>The other street facing facade 10% as windows and/or doors</u> 10% glazing as windows and/or doors
Where façade primary frontage <u>street-facing</u> includes a garage door	12.5% as windows and/or doors
This standard does not apply:	

¹⁰⁶ Page 31

- To residential units located 15 metres or more from the primary street frontage.

See MRZ-Figure 4-3 which demonstrates the front façade glazing requirements and exceptions.

MRZ-Figure 4-2 Diagram showing front façade glazing requirements

649. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S13 – Front door orientation

650. There are five submissions to this standard, and one further submission. Kāinga Ora (SO199.39) seeks deletion of the standard. Leith Consulting (SO170.13) and Chris Teo-Sherrell (SO184.55) support retention as notified, while Phocus Planning (185.57), supported by FS06.39, and the Council as submitter (SO166.32) seek amendments.

651. I understand that PNCC is no longer pursuing inclusion of a diagram. I therefore recommend rejecting SO166.32.

652. Relying on the evidence of Mr Andrew Burns', at paragraphs 120 - 124, I recommend accepting SO170.13 and SO184.55 and rejecting SO185.57 and FS06.36, and SO199.39.

MRZ-S14 – Garages

653. There are seven submissions on this standard. Leith Consulting (SO170.14) seeks deletion, while Alan Kirk (SO135.2) and Chris Teo-Sherrell (SO184.56 and 57) seek amendments to amend the width requirement. Kevin and Ngaire Smidt (SO116.37), Phocus Planning (SO185.58) and Robert and Gill Norris (SO191.37) support the standard as notified.

654. Relying on the evidence of Mr Burns I recommend accepting SO116.37, SO185.85 and SO191.37 and rejecting SO135.2, SO170.14 and SO184.56 and 57.¹⁰⁷
655. **MRZ-S15 – on-site parking – location** – there are six submissions to this standard and one further submission. All submissions seek amendments to the notified drafting, primarily to delete clauses a. and b. Kāinga Ora (SO199.40) seeks relocation of the standard to Chapter 20 Land Transport.
656. Ms Fraser¹⁰⁸ and Mr Burns¹⁰⁹ have considered the relief sought by the submitters. Relying on their evidence, I recommend rejecting submissions seeking deletion of parts (a) and (b) of the standard. I also recommend rejecting SO185.58 (seeking a reduction in the width, a requirement for the depth to be 6.5m and parking provided for two cars) as Ms Fraser considers 5.5m is an appropriate distance between the property boundary and a garage and The Council cannot impose onsite parking requirements related to the number of vehicles.
657. In my opinion, the situation referred to by SO185.59 (i.e. that an existing non-compliance would trigger the standard) should not occur unless the MRZ rules trigger application of the standard. I also consider this submission point relates to the rules rather than the standard itself, which does not independently trigger resource consent requirements. I note that in response to submissions to MRZ-R9 (Addition or alteration of buildings and structures), including SO185.28 from Phocus Planning, I have recommended amendments that would remove application of MRZ-S15 in the situation this submitter refers to.¹¹⁰ As the submitter (and Kāinga Ora in FS06.04) sought clarification rather than specific amendments to the standard, and given that my recommended changes to MRZ-R9 address their concern in my opinion, I recommend rejecting the relief sought here.
658. I recommend accepting in part SO199.40 insofar as it relates to retaining the standard as notified. Moving this standard to Chapter 20: Land Transport, is out of scope of the plan change. As the standard applies only in the MRZ I consider that it needs to remain in this chapter. Cross references are appropriate when a

¹⁰⁷ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 127

¹⁰⁸ Statement of evidence of Harrier Fraser, dated 25 July 2025, Table 2, row 8

¹⁰⁹ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 128

¹¹⁰ See paragraph 298

particular rule or standard is referenced in multiple zone chapters, which is not the case for MRZ-S15.

MRZ-S16 – Vehicle crossings

659. There are six submissions to this standard. Alan Kirk (SO135.1) opposes the potential for two vehicle crossings per site. Chris Teo-Sherrell (SO184.59) has a similar view. Relying on the evidence of Ms Fraser,¹¹¹ I recommend rejecting SO135.1 and SO184.59.
660. PNCC (SO166.33) sees the inclusion of direction requiring that the location of a new or altered vehicle crossing must not require the removal of a street tree or modification, excavation or construction within the dripline. In addition to consistency with the equivalent requirement in Chapter 7A – Subdivision in the MRZ, this also protects the shade-giving ability of street trees. I recommend accepting SO166.33 for the reasons given in the submission, i.e. consistency with SUB-MRZ-S4 and to ensure street trees are not removed by new vehicle crossings when subdivision is not part of a development.
661. I recommend accepting in part SO199.41 insofar as it relates to retaining the standard as notified. Moving this standard to Chapter 20: Land Transport is out of scope of the plan change. As the standard applies only in the MRZ I consider it appropriate that it remains in this chapter. Cross references are appropriate when a particular rule or standard is referenced in multiple zone chapters, which is not the case for MRZ-S16.
662. In recommending accept in part for the relief sought by SO194.67 to MRZ-R7 (and hence MRZ-S20 (see paragraph 300) a consequential amendment is required to MRZ-S16 to include the requirement for a pedestrian visibility splay in this standard. The standard is based on the wording of ODP R20.4.2(a)(vi)h except that it applies to all vehicle crossings in the zone. Ms Fraser advises that a speed hump is an acceptable alternative to the visibility splay whether this cannot be achieved because of an existing fence on an adjoining property. I understand the cost of a speed hump is around \$350 (excluding GST and installation). In my

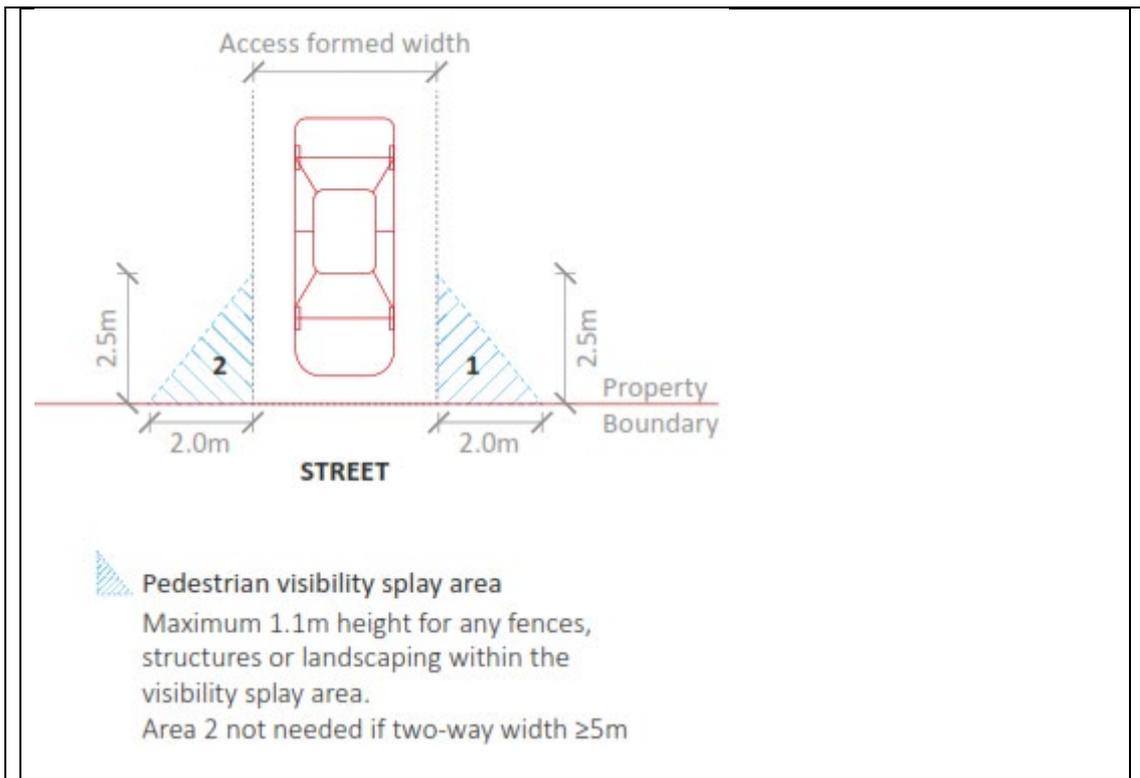
¹¹¹ Statement of Evidence of Harriet Fraser, dated 25 July 2025, Table 2, row 9

opinion a diagram would also assist with interpretation of the standard, and I have recommend including MRZ-Figure 6.

663. As I am recommending amendments to the standard, I recommend accepting in part SO170.16 and SO185.60.

664. I recommend the following amendments

<p>1. The maximum number of vehicle crossings per site is 1 per 8m of total frontage, with no more than two accesses* per site.</p> <p>2. <u>Where a vehicle access leg* or access strip* crosses a footpath, a pedestrian visibility splay in the form of a sight triangle measuring 2.0m along the front boundary by 2.5m along the access must be provided on each side of the access (see MRZ-Figure 6.</u> <u>The sight triangle must be kept clear of obstructions to visibility:</u></p> <p>a. <u>planting shall be kept to no more than 500mm high; and</u></p> <p>b. <u>any fence or standalone wall must be no more than 1.1m high.</u></p> <p><u>Where a vehicle access leg* or vehicle access strip provides access to two or more properties, a 75mm (7.5cm) high speed hump, located 1.0m from the property boundary, must be installed on the vehicle access strip* or vehicle access leg* where the sight triangle requirement cannot be achieved because of an existing fence on an adjoining property.</u></p> <p><u>MRZ-S16(2) does not apply:</u></p> <ul style="list-style-type: none"> • <u>To an existing fence on an adjoining property where access is to a single dwelling.</u> <p>3. <u>The location of any associated new or altered vehicle crossing must not require:</u></p> <p>a. <u>the removal of any tree planted on any public road, or</u></p> <p>b. <u>modification, excavation or construction within the area directly beneath the dripline* of the tree.</u></p>	<p>Matters of discretion where the standard MRZ-S16(1) or (2) is infringed:</p> <p>1. Safety effects on the land transport network and pedestrians.</p> <p><u>Matters of discretion where MRZ-S16(3) is infringed:</u></p> <p>2. <u>Health and maturity of the tree;</u></p> <p>3. <u>Provision _____ of _____ a replacement tree; and</u></p> <p>4. <u>Feasibility of alternative access* arrangements.</u></p>
<p>MRZ-Figure 6</p>	



665. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S17 – On-site vehicle manoeuvring

666. There are five submissions to this standard and one further submission. Leith Consulting (SO170.17) and Chris Teo-Sherrell (SO184.60) support the standard as notified. PNCC (166.34) seeks the inclusion of an advice note and a minor drafting correction (supported by Leith Consulting (FS01.7)). Phocus Planning (SO185.61) seeks the removal of this requirement for local roads with a 50km/hour speed limit, while Kāinga Ora (SO199.42) seeks relocation of the standard to Section 20: Land Transport, to avoid duplication.

667. I agree with the inclusion of the advice note, as sought by SO166.34, as this advice note advises plan users of the source of the diagram and the standard it achieves. I therefore recommend accepting SO166.34 and FS01.7.

668. With regard to SO184.17, I rely on the evidence of Ms Fraser that it would be appropriate to exclude a side-entry garage or parking space where vehicle access is from a Local Road and the access serves a single dwelling. I therefore recommend accepting SO184.17 in part.
669. Relying on the evidence of Ms Fraser,¹¹² I recommend accepting in part SO185.61 and amending the standard to include an exclusion for side entry garages or parking spaces where vehicle access is from a Local Road and the access serves a single dwelling only.
670. I recommend accepting in part SO199.41 insofar as it relates to retaining the standard as notified. Moving this standard to Chapter 20: Land Transport, is out of scope of the plan change. As the standard applies only in the MRZ I consider that it needs to remain in this chapter. Cross references are appropriate when a particular rule or standard is referenced in multiple zone chapters, which is not the case for MRZ-S17.
671. As I am recommending amendments to MRZ-S17, I recommend accepting in part SO170.17 and SO184.60.
672. I recommend the following amendments

1. On-site vehicle manoeuvring must comply with MRZ-Figure **78** where there is a side-entry garage or parking space.

MRZ-S17 does not apply to:

- A side-entry garage or parking space where vehicle access is from a Local Road and the access serves a single dwelling only.

Advice Note: This diagram accommodates an 85th percentile single movement swept path as per AS/NZS 2890.1 The Australian/New Zealand Standard Parking Facilities – Part 1- Off-street Car Parking

MRZ-Figure **78 Diagram showing required on-site vehicle manoeuvring requirement**

673. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan

¹¹² Statement of evidence of Harriet Fraser, dated 25 July 2025, Table 2, row 10

provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S18 – on-site bicycle parking

674. There are eight submissions to this standard. Rangitāne (SO137.34) and Leith Consulting (SO170.18) support the standard as notified. PNCC (SO166.35), Kevin and Ngaire Smidt (SO116.39), Robert and Gill Norris (SO191.39) and Chris Teo-Sherrell (SO184.61) seek amendments to the effect that the requirement is for a minimum of 1 bicycle park. Chris Teo-Sherrell also considers the term bicycle park should be defined. Kāinga Ora (SO199.43) seeks additional text relating to the location of the cycle parking. Phocus Planning (SO185.62) seeks deletion of the standard, on the basis it is difficult to determine compliance, it is not always appropriate for the elderly or those with accessibility issues, and they also do not accept that provision of bike space will encourage mode shift.
675. Starting with SO185.62, I do not agree that compliance would be difficult to confirm. Compliance with this requirement, as with others related to the built structure of a new dwelling, will be assessed at the building consent phase, as part of the check of whether a resource consent is required.¹¹³ I agree with Ms Fraser that a single dwelling may have many different occupants over the building's lifetime, and requiring cycling parking ensures storage space is available for those who want to ride bikes.¹¹⁴ I therefore recommend rejecting the relief sought.
676. I have discussed with Ms Fraser whether a definition of bicycle parking would assist with interpreting the standard. We agree that while a separate definition is not required, plan users would benefit from greater clarification in the rule drafting through reference to the 90th percentile bicycle as defined in Appendix 20D of the ODP. I therefore recommend accepting SO184.61.
677. Regarding SO199.43, I do not consider the drafting suggested by Kāinga Ora added significant clarity to the notified standard. However, I have proposed an amendment that will assist by specifying that bicycle parking must be provided

¹¹³ Section 37 of the Building Act 2004.

¹¹⁴ Statement of evidence of Harriet Fraser, dated 25 July 2025, Table 2, line 11

in a garage, yard, shed or secure community area, and removing the reference to 'external' in MRZ-S18.4 Accordingly I recommend accepting SO199.43 in part.

678. I recommend accepting SO166.35, SO116.39 and SO191.39 as I agree with the relief sought that the requirement should be for a minimum rate of cycle parking. I recommend accepting in part (as I have recommended changes to the notified standard) SO137.34 and SO170.18. I have recommended a small drafting change for clarification, to include parking in point 4.

679. I recommend the following amendments

1. Bicycle parking must be provided for all *residential units* at a minimum rate of 1 bicycle park per *residential unit*;
2. Each bicycle park must be able to accommodate a 90%tile bicycle, as defined in Appendix 20D – Section 20.
3. Bicycle parking must be located in a garage, yard, shed or secure communal area; provided either within each residential unit or within a secure structure (which may be communal);
4. Any ~~external~~ bicycle parking must not impede pedestrian thoroughfares, *accessible routes**, vehicle parking, circulation or manoeuvring areas; and
5. The number of bicycle parks provided within a communal *structure* must meet or exceed the number of *residential units* on-site.

680. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S19 – on-site rubbish storage and collection

681. There are ten submissions and three further submissions on this standard. All but two submissions seek amendments – the remaining two submitters support the standard as notified.

682. Several submitters raised concerns about the requirement for screening all rubbish areas. I agree the standard as notified would have applied to bin storage that may not be visible from the public realm or communal areas, and this goes further that is appropriate when considering visual effects. I consider the drafting amendment proposed by SO170.19 to generally be an effective amendment. I remain of the opinion that screening is appropriate in certain circumstances and

I therefore I recommend amending MRZ-S19.1 and 2 to require screening where a rubbish storage area is visible from a public road, shared accessway or communal area. Accordingly, I recommend accepting in part SO164.3, SO170.19 and SO184.62 insofar as I have proposed slightly different drafting and rejecting SO185.63.

683. I rely on the advice of Ms Fraser that any updating of references to the latest national road hierarchy should be undertaken via a review of Section 20 Land Transport rather than via PC:I.¹¹⁵ I therefore recommend rejecting SO184.63.

684. I disagree with SO199.44 that MRZ-S19.2 is deleted because there is no related matter of discretion. In my opinion matter of discretion 3 is the relevant matter relating to this standard. Should the Hearing Commissioners consider this is not sufficient, I consider an additional matter could be added, specifically for visual effects.

685. SO203.9 sought extensive amendments to the standard, including inclusion of a minimum area for rubbish storage, references to the location of rubbish storage, a requirement for sufficient kerbside space, that rubbish storage is accessible for a collection vehicle where on-site waste collection is used and an additional matter of discretion. I recommend accepting in part the relief sought insofar as it relates to:

(a) Replacing the reference for a rubbish storage area sized to accommodate a 240l bin and a recycling crate with a minimum area. Following discussion with the Council's Resource Recovery Team, I recommend this area is a minimum of 1.7m x 1.2m. Referring to an area rather than specific rubbish/recycling bins and crates will provide for any future changes to rubbish and/or recycling in the city. I acknowledge this is a larger area than sought by Enviro NZ – the proposed area appropriately reflects current and potential future resource recovery requirements. While Kāinga Ora made a further submission (FS06.44) they did not raise a concern about the proposed change in area sought by Enviro NZ.

¹¹⁵ Statement of evidence of Harriet Fraser, dated 25 July 2025, Table 2, line 12

- (b) Screening, consistent with my views in paragraph 567.
 - (c) Requirement for any rubbish storage area to be accessible for the collection vehicle. I have considered Enviro NZ's suggested drafting and recommend making similar amendments to the relief sought.
686. I do not support the inclusion of a matter of discretion which refers to odour and noise effects of rubbish collection location. There is a general duty to avoid unreasonable noise in s 16 of the RMA and a general duty to avoid, remedy or mitigate adverse effects in s17 of the RMA. Further, R6.2.6.2 (Exclusions from Noise Control Rules) excludes noise from vehicles driven within a site as part of normal residential activity and I consider a weekly rubbish/recycling collection to fall within that exclusion. With regard to accessibility, I have included a reference in matter of discretion 3. I do not support the reference to noise and odour, I recommend accepting FS06.44.
687. Following my discussion with the Council's Resource Recovery Team, I am recommending a minor drafting amendment to the title of the standard, to include a reference to recycling – this more accurately reflects variety of waste and resources that Council, and private contractors, recover from residential sites. I have also recommended a minor drafting amendment to MRZ-S19.1, to be clear that a rubbish and recycling storage area may be provided individually or communally.
688. I disagree with the relief sought by SO166.36 that communal storage areas must be provided for four or more developments. In my opinion, this imposes an unnecessary restriction on site design and layout. The key issue is that residential units have access to rubbish and recycling storage areas, which is addressed in the response to SO203.9.
689. As I am recommending amendments to the drafting, I recommend accepting in part SO116.40 and SO191.40.

690. I recommend the following amendments

MRZ-S19 On-site rubbish <u>and recycling</u> storage and collection	
<p>1. Each residential unit must have access to a screened rubbish <u>and recycling</u> storage area <u>(which may be individual or communal) with a minimum area of 1.5m² and a minimum dimension of 1m in any direction which is sized to accommodate one 240l wheelie bin and one recycling crate.</u></p> <p>2. Communal <u>Rubbish and recycling</u> storage areas must be screened or located so as not to be visible from a public road, <u>shared accessway or communal area.</u></p> <p>3. <u>Where on-site rubbish and recycling collection is used:</u></p> <p>a. <u>the storage area must be accessible for the collection vehicle to service the rubbish storage area and</u></p> <p>b. <u>where the site fronts an Arterial or Collector Road, on-site turning for trucks is required.</u></p> <p>4. 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.</p>	<p>Matters of discretion where the standard is infringed:</p> <p>1. Safety effects on the land transport network and pedestrians;</p> <p>2. Effects on the safe internal site circulation and manoeuvring areas, including for pedestrians; and</p> <p>3. Location, <u>accessibility,</u> and size of rubbish storage area.</p>

691. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:1. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S20 – Fences and standalone walls

692. There are 11 submissions on this submission. Two submissions support the standard as notified and the rest seek amendments. The notified standard would benefit from clarification. I therefore recommend accepting SO129.3 as this submission seeks clarification about the fence heights. I also recommend accepting SO104.3 as the standard is focused on maintaining a balance between privacy and visibility.

693. Ground level is defined in Chapter 4A, and this definition is consistent with the relief sought by SO164.4. I therefore recommend accepting the relief sought.

694. SO166.37 seeks several amendments to improve drafting clarity. Taking into account the relief sought by other submissions on this standard, I recommend

accepting in part SO166.37 insofar as it relates to correction of the typo in the reference to MRZ-S16. In my opinion it is not necessary for this standard to be consistent with the equivalent requirement in the Residential Zone, as the types of development will likely be different.

695. Relying on Mr Burns' evidence,¹¹⁶ I recommend accepting S170.20, SO185.64 and SO191.41 and accepting in part SO166.37 and deleting MRZ-S20.2(b). This would also require deletion of the Advice Note, as a consequential amendment.
696. With regard to MRZ-S20.3 I recommend accepting in part SO116.41, SO184.64 and SO191.41. While I recommend deletion of this part of the standard, it is because I propose that MRZ-S16 is amended to include a reference to visibility plays.¹¹⁷ This amendment is in response to SO184.67 (to Rule MRZ-R7 – see paragraph 294). Accordingly, I recommend accepting SO184.65 in part, as MRZ-S20.2(c) will be deleted. I note that Mr Burns supports this approach.¹¹⁸
697. As I am recommended amended drafting, I recommend accepting in part SO199.45, as Kāinga Ora sought retention of the standard as notified.
698. I recommend the following amendments

1. Any fence or standalone wall, or combination of these *structures*, must not:
 - a. Exceed a maximum *height* of 1.8 metres above *ground level*; or
 - b. Obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities.
2. On a front boundary with a public *road* any fence or standalone wall, or combination of these *structures*, must not exceed:
 - a. 1.1 metres above ground level for 2/3 of the frontage width; and
 - b. 1.8m above ground level for the remaining 1.3 of the frontage width~~- a. Exceed a maximum height of 1.8 metres above ground level; and
 - b. For any part of a fence or standalone wall above 1.1 metres in height, at least 2/3 of the fence must be of open construction.~~

Except that:

- Where a fence is erected on the *road* frontage of a *corner site**, the requirements of MRZ-S~~16~~20.2 only apply to one *road* frontage.

~~**Advice Note:** Open areas exclude any surface of the fence which is solid, but may include wire mesh, or wrought iron or similar elements with a facing edge not thicker than 12mm and spaced at not less than 80mm centres.~~

¹¹⁶ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 136

¹¹⁷ See paragraph 547

¹¹⁸ Statement of evidence of Andrew Burns, dated 25 July 2025, paragraph 137

~~3. Within 2.5 metres of any boundary adjoining a public road, any fence or standalone wall on a side boundary next to a vehicle access leg* must be no more than 1.1 metre high.~~

MRZ-S16~~20~~ does not apply to existing fencing within a site.

Please refer to MRZ-S16 for requirements for pedestrian visibility splays for vehicle access legs* or vehicle access strips*.

699. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

MRZ-S21 – mechanical ventilation

700. There are six submissions to this standard. Kevin and Ngaire Smidt (SO116.42), Leith Consulting (SO170.21) and Robert and Gill Norris (SO191.42) support the standard as notified. Chris Teo-Sherrell (SO184.66) seeks clarification about drafting, while Kāinga Ora (SO199.46) seeks relocation of the rule to the General Chapter and drafting clarification. Phocus Planning (SO185.65) seeks deletion on the basis that the Building Act 2004 controls ventilation and it is difficult to measure compliance.

701. With regard to SO184.66, 'relive' in 1(b) of the standard is a typo – this should be replaced with 'relief'. I therefore recommend accepting this submission and amending the standard accordingly.

702. The benefits of shifting the standard to the General Chapter and then amending the standard to apply only to MRZ-R20 and MRZ-R22, as sought by SO199.46, are unclear to me. This outcome seems no different from leaving the standard in Chapter 10A, where it clearly applies to the relevant activities within the MRZ; my view is supported by Mr Syman.¹¹⁹ I understand that PNCC is in the process of re-housing the operative District Plan to give effect to the NPS Framework. Once this is complete it may be appropriate to relocate MRZ-S21 to a unified Noise chapter. That is not within the scope of this plan change. At paragraph 28 of his evidence, Mr Syman confirms that the grilles or diffusers are the internal

¹¹⁹ Statement of evidence of Sean Syman, dated 25 July 2025, paragraph 27

components of a mechanical ventilation system. Mr Syman considers that amendments are not required to MRZ-S21 in response to SO199.46, and I agree with this conclusion. I therefore recommend rejecting the relief sought.

703. With regard to SO185.66, I rely on the advice of Mr Syman, at paragraphs 20-23 of his evidence, that measuring compliance is not difficult and I therefore recommend this submission is rejected.

704. Turning to submissions in support of MRZ-S21 as notified, as I have recommended changes in response to SO184.66, albeit minor, I recommend accepting in part SO116.42, SO170.21 and SO191.42 as these submitters sought retention as notified.

705. I recommend the following amendments

Amend MRZ-S21

1. Any mechanical ventilation system must:
 - a. Be adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 1 air change per hour;
 - b. Provide ~~relieve~~ relief for equivalent volumes of spill air;
- ...

706. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

Chapter 7B – Subdivision in the MRZ

SUB-MRZ-S1

707. There are four submission points on this standard, all of which support the standard with amendments.

708. As notified, SUB-MRZ-S1 required that all access must be via one of four different types of legal access. PNCC (SO166.50) has identified that these four types of access apply to access to rear allotments only. The Council proposes amendments to rectify this drafting error. As I agree the correction is required, I recommend accepting the relief sought.

709. Phocus Planning (SO185.79) propose a drafting change to replace 'controlled' with 'discretion' in the reference to 'matters of control'. I agree with this submitter that 'discretion' is the appropriate drafting as these matters are triggered when a controlled activity standard is not met, and the activity cascade is to an RDA. I therefore recommend that this submission is accepted.
710. Kāinga Ora (SO199.13) propose removing the notified limit for the number of access strips for a shared access and removing the number of allotments that can be served by a right of way or access strip on the basis that effects can be managed through widths and pedestrian access through the Land Transport Chapter.
711. MRZ-SUB-S1 is a replication of Rule 7.6.1.1(d) in ODP Chapter 7 - Subdivision. The rule is designed to provide certainty that up to six allotments will be acceptable if a certain width can be achieved (i.e. two-three allotments requires a legal width of 3.5m for a shared access and four-six allotments require a 5 metre width (R20.4.2(a)(viii)).
712. I rely on the evidence of Ms Fraser, in Table 2, row 15, where she agrees with the relief sought by Kāinga Ora, that the restriction to a specific number of dwellings should be deleted, and their reasons, that the effects associated with shared access can be managed through widths and pedestrian access. Accordingly, I recommend accepting SO199.13,
713. I recommend the following amendments:

SUB-MRZ-S1 - Access	
<p>1. Each <i>allotment</i> must have practical, physical and legal access to a public road by way of either:</p> <p>2. <u>Access* to a rear allotment must be via</u></p> <p>a. an access leg at least 3 metres wide forming part of the allotment lot; or</p> <p>b. a shared access consisting of up to six access strips lying adjacent to one another and giving access to no more than five other allotment lots, and in respect of which reciprocal rights-of-way are granted or reserved; or</p> <p>c. an access strip held in common ownership with the rear allotment and</p>	<p>Matters of discretion control where the standard is infringed:</p> <p>1. Connectivity with the surrounding road network;</p> <p>2. Whether any alternative access arrangement is located, formed and constructed in a manner that is suited to the development or activity it serves;</p> <p>3. Safe and efficient operation of the roading network; and</p>

<p>any other allotments it provides access to up to five other allotments; or</p> <p>d. any right-of-way running with and appurtenant to the land in which the allotment is comprised.</p> <p>...</p>	<p>4. Location and design of any site access.</p>
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714. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MRZ-S2

715. There are two submission points on this standard.

716. Kāinga Ora (SO199.14) proposes that this standard is relocated to the Land Transport chapter of the District Plan. They sought similar relief for other provisions (for example MRZ-P4¹²⁰). Consistent with my recommendation on all other similar Kāinga Ora submissions, I recommend rejecting the relief sought as this standard only applies to subdivision in the MRZ. I understand that PNCC is in the process of re-housing the ODP to be National Planning Standards compliant, and the intent is to have all transport related standards located in the Energy, Infrastructure and Transport chapter. This process is happening outside PC:I, and I do not recommend making changes at this stage.

717. As I proposed keeping this standard as notified, I recommend accepting SO185.80.

SUB-MRZ-S3

718. Phocus Planning (SO185.80) propose a drafting change to replace 'controlled' with 'discretion' in the reference to 'matters of control'. I agree with this submitter that 'discretion' is the appropriate drafting as these matters are triggered when a controlled activity standard is not met, and the activity cascade is to an RDA. I therefore recommend that this submission is accepted.

¹²⁰ SO199.20

719. I recommend the following amendments.

SUB-MRZ-S3 Essential Services	
<ol style="list-style-type: none"> 1. All <i>essential services</i> must be available for connection within 30 metres of the nearest point of the land being subdivided. 2. All new <i>allotments</i> must have sewer, stormwater and water supply services that are connected to <i>essential services</i>. 3. All new <i>essential services</i> proposed in a <i>subdivision</i> must be located in public service corridors either where they are to vest in Council or service in excess of six <i>allotments</i>. 	<p>Matters of discretion control where the standard is infringed:</p> <ol style="list-style-type: none"> 1. The layout and design of services and service connections to essential services.

720. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

SUB-MRZ-S4

721. Phocus Planning (SO185.81) propose a drafting change to replace 'controlled' with 'discretion' in the reference to 'matters of control'. I agree with this submitter that 'discretion' is the appropriate drafting as these matters are triggered when a controlled activity standard is not met, and the activity cascade is to an RDA. I therefore recommend that this submission is accepted.

722. Although I have made a minor drafting amendment, this does not change the intent of the standard and I therefore recommend accepting SO178.5, which supports the standard as notified.

723. I recommend the following amendments.

SUB-MRZ-S4 Street Trees	
<ol style="list-style-type: none"> 1. The layout of the subdivision and the location of any associated new or altered vehicle crossing does not require: <ol style="list-style-type: none"> i. the removal of any tree planted on any public road, or 	<p>Matters of discretion control the standard is infringed:</p> <ol style="list-style-type: none"> 1. Health and maturity of the tree; 2. Provision of a replacement tree; and

ii. modification, excavation or construction within the area directly beneath the dripline of the tree.	3. Feasibility of alternative access arrangements.
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724. I consider these amendments to be the most appropriate way to give effect to the objectives of PC:I. They are more efficient and effective than the notified provisions as they will assist plan users with interpreting the relevant plan provisions. There are no additional environmental, economic, social or cultural costs arising from this recommendation.

R. CONCLUSION

725. Submissions have been received both in support of and opposition to the matters and provisions assessed in this report.

726. For the reasons set out in the s 32AA evaluation included throughout this report, I consider that the proposed objectives and provisions, with the recommended amendments, will be the most appropriate means to:

- (a) Give effect to the requirements of relevant higher order documents, in particular the NPS-UD, and overall give effect to the sustainable management purpose of the RMA where it is necessary to revert to Part 2, in respect to the proposed objectives; and; and
- (b) Achieve the relevant objectives of PC:I, in respect to the proposed provisions.

S. RECOMMENDATIONS

727. I recommend that:

- (a) The Hearing Panel accept, accept in part, or reject submissions (and associated further submissions) as outlined in **Appendix 1** of this report; and
- (b) PC:I is amended in accordance with the changes recommended in Appendices 2 – 5 of this report.

Sarah Jenkin

25 July 2025

T. APPENDICES

Appendix 1 – Accept/Reject Table

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO01.1	Patricia Cardinelli-Wayne			SO01.1	Patricia Cardinelli-Wayne	Entire Plan Change	Amend	Amend to include disabled access to homes so that houses are also affordable and accessible to the disabled community.	Because I cannot see anything for disabled people to be able to live in some of these houses. If you break your ankle how will you be able to climb up three stairs for the 3+ months it takes to heal? Our blind community, our wheelchair community, our invisible disabilities community and a lot of other disabilities are not covered by this plan. Being able bodied is only a temporary state. Have the Blind Low Vision NZ, Enabling Good Lives, Crohns and Colitis NZ and other disability groups/associations been consulted in how to make homes/this plan to include our disabled whānua?	Reject
SO01.1	Patricia Cardinelli-Wayne	FS01.1	Leith Consulting Limited	SO01.1	Patricia Cardinelli-Wayne	Entire Plan Change	Support in part	Allow in part	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.	Accept in part
SO02.1	Carolyn Bashford			SO02.1	Carolyn Bashford	Entire Plan Change	Support	11 meters is ok in most locations.	The more housing available to families is good	Accept
SO03.1	Collette Martin			SO03.1	Collette Martin	Zone extent	Oppose	Remove Featherston Street from the MRZ	Featherston St is already an extremely busy street, with multiple schools, businesses and residential homes.	Reject
SO04.1	Karwa Dyer			SO04.1	Karwa Dyer	Entire Plan Change	Amend	Amend to have neighbours consent prior to building	It's affecting home owners and could potentially devalue their property	Reject
SO05.1	Jaskaran Singh			SO05.1	Jaskaran Singh	Entire Plan Change	Support	Not stated	Not stated	Accept
SO06.1	John Mullinger			SO06.1	John Mullinger	Entire Plan Change	Oppose	I disagree with allowing extra height and more than one dwellings per site	PNCC is removing on street parking at an alarming rate. Each dwelling will have 1-2 cars that will need to be parked somewhere. The removal of the requirement for off street parking means that there is nowhere for these cars.	Reject
SO07.1	Robert Goddard			SO07.1	Robert Goddard	Zone extent	Amend	Focus zone on areas very close to The Square	Not stated	Reject
SO08.1	Ruichen Li			SO08.1	Ruichen Li	Entire Plan Change	Oppose	Delete the plan change.	Palmerston North is still very small. It's much better to expand outwards from the city prior to densify it. The entire city only takes a 10 minute drive to get from one side to the other. There's no need to make the city more dense.	Reject
SO09.1	Aya Al-Ibousi			SO09.1	Aya Al-Ibousi	Entire Plan Change	Oppose	Delete the plan change.	I don't agree with the medium density housing. I don't think palmy is a city that should expand upwards. I think we can expand outwards. We moved from Auckland to palmy seeking the big yards and big houses. We don't want to see this happen here.	Reject
SO10.1	Holly Scott			SO10.1	Holly Scott	Entire Plan Change	Oppose	Delete the plan change.	Too restricted	Reject
SO11.1	Michael Mccavana			SO11.1	Michael Mccavana	Zone extent	Oppose	Exclude Whiskey Creek liquefaction floodplain from the MRZ.	Building on a floodplain will never be ok.. it will get hit sooner or later.	Accept
SO12.1	Goodwin Family			SO12.1	Goodwin Family	Entire Plan Change	Oppose	Delete the plan change.	Just because there's duplexes down our street, in which u will raise rates for who knows what project I don't believe u have sent any communications until today, unless you're having secret meetings and not all of us get the opportunity to have a say	Reject
SO13.1	Aous Al-Ibousi			SO13.1	Aous Al-Ibousi	Zone extent	Oppose	Re-evaluate and potentially exclude the midpoint of Fairs Road (from 27 to 85) due to the recent changes in public transport routes.	The lack of public transport	Reject
SO14.1	Kate Vandemeer			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.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO14.1	Kate Vandemeer	FS06.1	Kāinga Ora	SO14.1	Kate Vandemeer	MRZ-S7	Oppose	Disallow	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.	Accept
SO15.1	Bruce and Margaret Belgrave			SO15.1	Bruce and Margaret Belgrave	Standards	Oppose	Not stated	Not stated	Reject
SO16.1	Kathryn Stowell			SO16.1	Kathryn Stowell	Standards	Amend	Amend the height suggestion of three stories. Two stories should be the absolute maximum in specific areas like Manapouri crescent and Elmira avenue to retain the original intention to have this area as a garden suburb.	Height controls are set too high for some special areas. See comment above.	Reject
SO16.2	Kathryn Stowell			SO16.2	Kathryn Stowell	Rules	Oppose	Resource consent should be required for any building or alteration in specific areas like Elmira and Manapouri.	These are special heritage areas designated garden suburbs. Unregulated building could completely destroy the original intentions set down in 1929 as well as decrease the aesthetic appeal of the area.	Reject
SO16.3	Kathryn Stowell			SO16.3	Kathryn Stowell	Zone extent	Oppose	Delete areas like Manapouri and Elmira Crescents	Manapouri and Elmira are designated as a garden suburb. So putting duplexes and/or multi units would most probably lead to fewer gardens and fewer garages and more cars parked on the street. This would be against the intended aesthetic attractiveness of the area. It would also devalue properties.	Reject
SO16.4	Kathryn Stowell			SO16.4	Kathryn Stowell	Zone extent	Support	Keep the medium density housing to areas close to public transport	No buses go down Victoria Ave. the only bus that goes down Albert Street is one of the Massey buses. I don't think this should change. This will keep Elmira and Manapouri more private, quieter streets and encourage property owners to maintain gardens as was the original intention of the city plan in 1929. There are other areas on busy bus routes more suitable for medium density housing.	Reject
SO16.5	Kathryn Stowell			SO16.5	Kathryn Stowell	Standards	Oppose	Section sizes in specific areas should not be smaller than already existing. Eg Elmira and Manapouri.	Smaller sections means no lawns or gardens as has occurred in other areas of the city. Garden suburbs need gardens. Gardens need a reasonable sized section.	Reject
SO17.1	David Brooks			SO17.1	David Brooks	Zone extent	Amend	Revise the standards by which a suburb is selected for inclusion.	You will create massive traffic snarl ups if this is not given proper attention. And don't say everyone will walk or bike because that is simply not true.	Reject
SO18.1	Shane Telfer			SO18.1	Shane Telfer	Entire Plan Change	Support	Not stated	Not stated	Accept
SO19.1	Rob Belchamber			SO19.1	Rob Belchamber	Entire Plan Change	Oppose	Not stated	Not stated	Reject
SO20.1	Ruth Jackson			SO20.1	Ruth Jackson	Entire Plan Change	Support	Retain as notified	I think our cities will be more efficient and enable more affordable housing if urban density is matched to transport and shopping/community facilities. A note however, living in Panako Place I have noticed it often floods during periods of heavy rain. Maybe stormwater systems need upgrading and flood mitigation measures need to be included in any new builds.	Accept
SO21.1	Edwin Hoeksema			SO21.1	Edwin Hoeksema	MRZ-S1	Oppose	Amend	11 metre height will take away all privacy to the residents on Summerhays Street	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO22.1	Nate Sextus			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) or 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.	Reject
SO22.1	Nate Sextus	FS06.2	Kāinga Ora	SO22.1	Nate Sextus	Zone extent	Support	Allow	Kāinga Ora support the increase in spatial extent in Hokowhitu.	Reject
SO23.1	Graeme Fenemor			SO23.1	Graeme Fenemor	Entire Plan Change	Support	Retain as notified	We need more housing, and it needs to be within the current city envelope as currently we are spreading and creating more traffic and commuting issues, this proposal will reduce the spread of infrastructure needs, and help with maintenance of the existing infrastructure and future infrastructure needs within the current city boundary envelope.	Accept
SO24.1	Susan Swan			SO24.1	Susan Swan	Entire Plan Change	Oppose	Delete the plan change.	Too many cars will be parked on streets as sections too small for parking; not enough green land on sections to absorb rain, will end up causing flooding and stormwater will not cope; who is going to pay for the extra infrastructure, don't want it to be a burden on taxpayers.	Reject
SO25.1	Tayte Cozens			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?	Reject
SO25.1	Tayte Cozens	FS06.3	Kāinga Ora	SO25.1	Tayte Cozens	Entire Plan Change	Oppose	Allow	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.	Accept
SO26.1	Adrian Morgan			SO26.1	Adrian Morgan	Zone extent	Oppose	Remove Kelvin Grove area	The Kelvin Grove area included in this proposal are all relatively new homes close to the outer city limits. Your plan has left out areas closer to the centre of town which have older homes which would better be demolished and replaced with healthier homes.	Reject
SO27.1	Carole Hill			SO27.1	Carole Hill	Zone extent	Amend	Exclude area on Featherston Street near Russell Street	Currently on Featherston St near Russell St, there is very little on road parking. Increasing the numbers of dwellings near the intersection which is frequented by school children, could be dangerous as well as frustrating for those that live there. The current difficulty to get in and out of the properties will only be made worse if there are more dwellings/driveways potential vehicles.	Reject
SO28.1	Kell and Antonio Wood			SO28.1	Kell and Antonio Wood	Zone extent	Oppose	Exclude parts of Kelvin Grove	We moved from Tyne street after living in my husband's family home due to all the new hnz houses that were put in down the street as it used to be a peaceful street but after these homes were built it got bad. Couldn't sleep due to noises , party's. Fighting. My children didn't even want to play out on the street anymore due to it. So am worried now as that was the main reason we moved away and gave up our home and moved the kelvin grove thinking we wouldn't have to put up with homes like that. So very disappointed to see that we are now in the zone	Reject
SO29.1	Lisa Greer			SO29.1	Lisa Greer	Entire Plan Change	Oppose	Not stated	Not stated	Reject
SO30.1	Jean Tipping			SO30.1	Jean Tipping	Zone extent	Oppose	Address stormwater problems in Margaret Steet first before intensifying.	We already have significant storm water problems at the. Bottom of the hill in Margaret Street, mainly house numbers 10, 12, 11 and 9 and 9A. The storm water floods the street on both sides of the road in heavy rain events. Twice the fire brigade has been called out to pump out water surrounding the house at 9A. The storm water does not drain away in time in these events and causes significant stress and possible damage to the properties.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO31.1	Gavin Casey			SO31.1	Gavin Casey	MRZ-S1	Oppose	Leave it at a maximum 9m height of the building	Some owners that own the original buildings will be at a disadvantage in the reduction of sunlight and some circumstance, their privacy. A resource consent needs to be implemented with height of buildings in urban areas that are already developed. Developing areas are better equipped in establishing higher buildings.	Reject
SO31.2	Gavin Casey			SO31.2	Gavin Casey	MRZ-R7	Amend	Some circumstances, 3 units/ houses will be too much. Especially in cul-de-sacs. Numbers of development needs to be lower in certain established areas.	More street parking. Streets become crowded. Increase risk of anti-social behavior. Increase in noise pollution.	Reject
SO32.1	Philip Watkinson			SO32.1	Philip Watkinson	MRZ-S1	Amend	In additional to existing provisions, if a height to this proposed building has existing rooftop solar electricity generation then alter the new build to make sure the existing build is not shaded significantly more by this proposed build during the months of least solar power of May, June and July.	Significant increase in the Neighbours rooftop shading during the months of least solar power of May, June and July with significantly economically disadvantage the Neighbour by significantly reducing the rooftop solar electricity generation of the Neighbour.	Reject
SO33.1	Paul J Moughan			SO33.1	Paul J Moughan	MRZ-S2	Support	Retain as notified	Height limit in relation to boundary means people in this area won't be affected by shading from tall buildings.	Accept in part
SO33.2	Paul J Moughan			SO33.2	Paul J Moughan	MRZ-R7	Support	Retain as notified	Overall I strongly support the proposed change: Increased housing supply and choice. It makes better use of valuable city infrastructure and will help to revitalise the CBD.	Accept in part
SO33.3	Paul J Moughan			SO33.3	Paul J Moughan	Zone extent	Support	Reduce the zone extent	Perhaps, initially, the scheme should apply to areas contiguous with the Square.	Reject
SO34.1	Daniel Hamid			SO34.1	Daniel Hamid	MRZ-S1	Oppose	Not allowing very tall housing to be built where it will block sunlight or reduce privacy for existing houses.	I am concerned about tall developments reducing the quality of life for existing residents where tall buildings block sun and/or remove existing privacy by allowing line of sight into existing houses.	Reject
SO35.1	Hayden Giles			SO35.1	Hayden Giles	Entire Plan Change	Oppose	Delete the plan change.	I object to everything. Build new suburbs. Don't stuff up the neighborhoods and people's lives.	Reject
SO36.1	Mark and Zeld Anderson			SO36.1	Mark and Zeld Anderson	Entire Plan Change	Oppose	Delete the plan change.	Concerns about noise, anti-social behaviour, negative impacts on right to enjoy properties in peace and resale values.	Reject
SO37.1	Roman Konopka			SO37.1	Roman Konopka	Entire Plan Change	Support	Not stated	Not stated	Accept
SO38.1	Lilian Obonyo			SO38.1	Lilian Obonyo	Entire Plan Change	Support	Retain as notified	Not stated	Accept
SO39.1	Steve Billington			SO39.1	Steve Billington	Entire Plan Change	Oppose	* Reassess the areas proposed for medium-density development to ensure they align with community expectations and environmental considerations. * Prioritise infrastructure upgrades before increasing housing density. * Explore alternative solutions.	Concerns about impact on neighbourhood character, infrastructure capacity, traffic and parking and environmental impact	Reject
SO40.1	Amardeep Singh			SO40.1	Amardeep Singh	Entire Plan Change	Support	Not stated	Not stated	Accept
SO41.1	Bev McKay			SO41.1	Bev McKay	Zone extent	Oppose	Remove Kelvin Grove area from the MRZ	Concerns about decrease in property values, loss of privacy, impacts on amenity and character.	Reject
SO42.1	Ikap Holdings Limited			SO42.1	Ikap Holdings Limited	Zone extent	Oppose	Remove Sections at Bodell Street, and adjacent houses along Featherston Street from this proposal. Specifically the area encompassed by Ruahine Street, Featherston Streets and Heretaunga Streets.	Frequent stormwater and sewage overflow from the infrastructure under heavy rain has caused flooding in the past. Adding significantly more housing to this particular area poses significant repetition of these events. Bodell Street aged care area should be available for Hospital expansion in the future, increased housing or other development in this area will inhibit future possibilities	Reject
SO42.1	Ikap Holdings Limited	FS04.1	Arohanui Hospice Limited	SO42.1	Ikap Holdings Limited	Zone extent	Oppose	Retain zone extent in this location	Through the original submission, Ikap Holdings Limited's submission 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	Withdrawn

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO43.1	David White			SO43.1	David White	Reserves rezoning	Oppose	Stop the process to rezone these reserves to housing	The rezoning of reserve land should not take place. There is more need for public reserves if you are going to increase housing density. In fill housing and multi-level units do not allow for recreation space on private land. While it may be argued there is other reserve land near these 2 blocks this will not always be the case. The reserve were set up by our city founders to ensure there is green space. We should respect that.	Reject
SO44.1	Angela Oliver			SO44.1	Angela Oliver	Entire Plan Change	Oppose	Delete the plan change.	Not in favour of increased density housing, even though I understand there is a requirement for more housing.	Reject
SO45.1	Eru Henare-Findlay			SO45.1	Eru Henare-Findlay	Entire Plan Change	Support	Retain as notified	Please use this as an opportunity to make Palmerston north less car centric	Accept
SO46.1	William Glassey			SO46.1	William Glassey	Standards	Support	No off-street parking for most units.	Traffic is a real problem for exiting residents, especially cyclists and pedestrians. We now have a very good bus service in this street, which should be encouraged and used. A lot/most of it is quite walkable to the square or terrace end.	Accept
SO47.1	Tania Wilson			SO47.1	Tania Wilson	MRZ-S1	Oppose	Delete this standard	The new height of 11m will impact neighbouring houses of normal height, by reducing their privacy and sunlight. The new proposed buildings only being 1.5m from boundary and 11m tall is an imposition and an eyesore for the city.	Reject
SO48.1	Samuel Hill			SO48.1	Samuel Hill	Entire Plan Change	Oppose	Require a resource consent for all development	It sets a worrying precedent.	Reject
SO48.2	Samuel Hill			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.	Reject
SO48.2	Samuel Hill	FS06.4	Kāinga Ora	SO48.2	Samuel Hill	General	Oppose	Disallow	and considers that the landscaping standards as notified are appropriate, subject to the Kāinga Ora submission. Further, the City	Accept
SO48.3	Samuel Hill			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.	Accept in part
SO48.3	Samuel Hill	FS06.5	Kāinga Ora	SO48.3	Samuel Hill	General	Oppose in part	Disallow	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	Accept
SO49.1	Melissa Viviers			SO49.1	Melissa Viviers	Zone extent	Amend	Remove Kelvin Grove area from the MRZ	Concerns about loss of privacy and Amenity, infrastructure strain, environmental impact, loss of neighbourhood character, increased traffic and parking, decreased property values and safety.	Reject
SO50.1	Con Fraser			SO50.1	Con Fraser	Entire Plan Change	Oppose	Not stated	Not stated	Reject
SO51.1	Kathleen and Rick Field			SO51.1	Kathleen and Rick Field	MRZ-S1	Oppose	Add a clause where the maximum height allowed in subsequent medium density developments must take into account already existing neighbouring solar panels.	Concern is that my recently installed solar panels may be overshadowed by a subsequent duplex or apartment building to my north side.	Reject
SO52.1	Hayley Steele			SO52.1	Hayley Steele	Zone extent	Oppose	Do not enable construction of three story duplexes down Bryant Street	Concerns about loss of character homes and lack of maintenance of new dwellings.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO53.1	Kim Mckelvey			SO53.1	Kim Mckelvey	MRZ-S1	Oppose	Houses should be no more than single storey	Concerns about loss of privacy and impact on other homeowners/residents.	Reject
SO54.1	Mark Patchett			SO54.1	Mark Patchett	MRZ-S1	Amend	Decrease the height allowance by 2-3 metres	These height controls are set too high as they would potentially	Reject
SO55.1	Duplicate of SO51									
SO56.1	Gerard Tapp			SO56.1	Gerard Tapp	Entire Plan Change	Oppose	Remove the ability to develop multi builds on single sections without consulting neighbors	If you want to build bulk housing areas, why not purchase land and develop it there, rather than ruining peoples out looks and what they have worked hard for, to cram a few extra dwellings in.	Reject
SO57.1	Philip Robins			SO57.1	Philip Robins	Zone extent	Oppose	Remove Elmira from the MRZ	Emila is a special heritage avenue and dates back to 1929. It is one of the first examples of a garden suburb.	Reject
SO58.1	Sarah Harris			SO58.1	Sarah Harris	Zone extent	Oppose	Reduce the area covered by medium density zone	Allowing buildings of this height will shade other people's homes and damage the character of the area. The zone should be reduced to tighter boundaries around town so the suburbs remain suburbs.	Reject
SO59.1	Donna Cummerfield			SO59.1	Donna Cummerfield	Entire Plan Change	Oppose	Delete the plan change.	Concerns about loss of privacy, sunlight access, street character, increased traffic and congestion and loss of property value.	Reject
SO60.1	Dhaval Sevak			SO60.1	Dhaval Sevak	Zone extent	Support	Include Drake Street in the MRZ.	The low height restricts development potential.	Accept
SO61.1	Paul and Michelle Martin			SO61.1	Paul and Michelle Martin	MRZ-S1	Oppose	Reduce the proposed maximum building height of 11 metres to no more than 8 metres.	The proposed maximum building height of 11 metres is too high and will adversely impact the privacy of existing neighbours. It would also have a detrimental effect on the street appeal with large 11 metre structures looking out of place amongst standard housing.	Reject
SO62.1	Jo-Anne Siegel			SO62.1	Jo-Anne Siegel	MRZ-S1	Oppose	Reduce the permitted height of buildings	Because of impacts on privacy in back yards	Reject
SO63.1	Allan Anderson			SO63.1	Allan Anderson	Zone extent	Oppose	Exclude "location sensitive" sites like Moerangi Street or amend the plan to ensure strict requirements for off-street parking and storm water reticulation.	My concern is mainly around provision for adequate stormwater and off-street parking. I refer specifically to Moerangi Street which is a cul de sac. Already, as a result of previous in-fill under the Council's residential planning, there is a significant off street parking issue with people parking on footpaths, in driveways and on both sides of the street with very limited space for through traffic. Additionally, storm water reticulation in the street has been a significant problem for a number of years, which even with regular Council staff intervention, has notified the problems.	Reject
SO64.1	Yen Cher Koh			SO64.1	Yen Cher Koh	Entire Plan Change	Support	Retain as notified	To improve the outlook of the city to make it more attractive as the building are aging.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO65.1	Malcolm Prince			SO65.1	Malcolm Prince	Stormwater Overlay	Amend	Include Keeling Street, Hendon Place and Ngaio in the area with added stormwater requirements.	The area of Keeling St where I live floods from footpath to footpath (sometimes over the footpath) in periods of sustained heavy rain. Flooding occurs between 65 and 71. The water does not drain away through the stormwater grates (outside 67 and 70 Keeling St) until well after rain has eased. If this area is not included in the area of added stormwater requirements I believe it should be exempt from the Medium Density Residential Zone.	Reject
SO66.1	Jan Schmid			SO66.1	Jan Schmid	Zone extent	Amend	Allow medium density housing throughout the city	No rationale is given, or apparent, why medium density housing should be restricted to places "within walkable distance to parks, shops, and public transport". Developers will build such housing only in places where they can expect that people will want to live in them. Thus why not leave it to market forces to determine where medium density housing will be built, rather than basing zones on some preconceptions on this matter, or the preferences of influential NIMBYs?	Reject
SO67.1	Audrey Aird			SO67.1	Audrey Aird	Stormwater Overlay	Amend	Place stormwater overlay on properties between 92 and 102 Russell Street inclusive where stormwater drains to gutter and land is below street level.	Increasing density/site coverage in this area without attention to cumulative effects of stormwater ponding due to the existing disposal issue of stormwater into the gutter from land below road level will lead to localised surface flooding	Reject
SO67.2	Audrey Aird			SO67.2	Audrey Aird	Standards	Amend	Require a parking space for each unit or if this is not acceptable require a percentage of the properties to have a parking space. (say 2/3).	Parking in the Hospital area residential streets is already an issue and commuter parking at the Grey Street end of Russell Street is also a known issue. Increasing the number of residential units without on-site parking will result in more parking issues for the neighbourhood.	Reject
SO68.1	Finn Barnett			SO68.1	Finn Barnett	MRZ-P7	Amend	Remove the requirement for all developments to have a stormwater management plan for all development within the stormwater overlay. Amend this to the effect of "developments must not have adverse stormwater runoff or impacts...attenuation tanks must be used with the capacity based on additional water collection and addition to stormwater system."	This is an untenable position for the council to take - requiring all developments in the VAST majority of the total area to have stormwater plans. This creates unnecessary bureaucracy and red tape, that is totally not needed. It is an example of the council not thinking realistically and in an appropriate way to address the potential risks. The addition of a 200m2 coverage single story house has the same roof size and therefore water collection as a 3 story 200m2 coverage house. Any additional non-permeable land should be factored in, just as it should be now. Regardless of medium density rules.	Reject
SO69.1	Paola Rojas			SO69.1	Paola Rojas	MRZ-S1	Support	Amend or add condition. Not to build higher than 2 story houses next to 1 story units, and have at least 2mts distance from the shares boundaries on back and side.	This submission due to the potential block of light and loss of privacy for neighbours living in 1 storey units.	Reject
SO70.1	Anita Sciascia			SO70.1	Anita Sciascia	MRZ-S1	Oppose	More than one story disadvantages anyone with mobility issues. Allowing taller buildings impinges on existing houses and will block natural light.	More than one story disadvantages anyone with mobility issues, use of mobility aids like wheelchairs. Plus more than one story will impinge on existing houses and their right to natural light. Especially if houses are so close together on a smaller allowed section.	Reject
SO71.1	Julie Griffiths			SO71.1	Julie Griffiths	MRZ-S1	Amend	Ensure height control is lowered to increase safety.	High rise buildings run the risk of even more people getting into danger when a major disaster or weather event occurs. More stand-alone buildings possibly with greater length or width would be better than greater height	Reject
SO72.1	Julie Keall			SO72.1	Julie Keall	MRZ-S1	Amend	Single story houses for less impact on neighbours living, privacy and sun/light impacts.	Height controls are too high. They will impact on people's privacy in their home and back yard. The sun will be blocked at certain times of the day, which will impact on outdoor living.	Reject
SO73.1	Kathriona Benvie			SO73.1	Kathriona Benvie	Entire Plan Change	Oppose	Oppose height should be no more than one storey in established one storey neighbourhoods. Oppose overbuilding on sections especially with limited green space to allow for rainwater runoff	Concerns about loss of sunlight, decreased outdoor space for new residents, reduced green areas for soakage, reduced privacy and increased shadowing.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO74.1	Karen Wilton			SO74.1	Karen Wilton	MRZ-R5	Amend	lighting requirements should apply; also should be requirements around hours of operation -needs to be proper consultation and consent if open outside of standard office hours.	Give neighbours and affected parties opportunity to influence development and operation.	Accept in part
SO74.2	Karen Wilton			SO74.2	Karen Wilton	MRZ-S1	Oppose	Retain current requirement	Current requirement ensures proper consideration and community input - other proposed relaxations are sufficient streamlining without removing this requirement.	Reject
SO74.3	Karen Wilton			SO74.3	Karen Wilton	Consequential amendments	Support	Retain as notified	Fair balance - good to have clear guidance.	Accept
SO74.4	Karen Wilton			SO74.4	Karen Wilton	Zone extent	Amend	Review areas earmarked for med density	Intensive housing development (with good requirements as proposed in this change) are fine for the central city 800m zone. I support this. Medium density development as per proposed changes would be appropriate for PN in new subdivision areas at Aokautere, Cloverlea or towards Ashhurst if sections and neighbourhoods are designed and constructed purposefully such that they have appropriate amenities and environment -retrofitting into 1950 and 1970 suburbs does not work well for community building (e.g. properly catering for disabled elderly, people with mental health or providing space for kids to play).	Reject
SO75.1	Chris Robertson			SO75.1	Chris Robertson	Entire Plan Change	Oppose	Delete the plan change.	The predicted growth will not occur in Palmerston North and so in-fill construction of new homes is not required. The Council should focus on current and readily identifiable issues such as a new bridge across the Manawatu River to relieve traffic congestion.	Reject
SO76.1	Geneva Housing Ltd			SO76.1	Geneva Housing Ltd	Zone extent	Amend	Remove 353 and 355 Albert Street from the MRZ.	The sites are both adjacent to and directly opposite the local centre of Hokowhitu. Geneva Housing has long signaled its interest with Council officers in the redevelopment of this land to for commercial or retail activities that will contribute to and strengthen the local centre. The justification for this is not only that the land is contiguous with the centre and is the best location for growth of the centre but also that increased densities of residential development from this Plan Change will increase the land area needed for local services which can be met by this submission.	Reject
SO77.1	Rachel O'Dea			SO77.1	Rachel O'Dea	Zone extent	Oppose	Fix stormwater problems in the Hobson Street, Takaro, area before allowing more housing.	The current stormwater system is unable to cope with rain and water runs through the submitter's property when the stormwater system is overloaded.	Accept
SO78.1	BP, Mobil and Z Energy (The Fuel Companies)			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 framework.	Accept in part
SO78.1	BP, Mobil and Z Energy (The Fuel Companies)	FS06.6	Kāinga Ora	SO78.1	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-P2	Oppose	Disallow	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.	Accept
SO78.2	BP, Mobil and Z Energy (The Fuel Companies)			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.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO78.2	BP, Mobil and Z Energy (The Fuel Companies)	FS06.7	Kāinga Ora	SO78.2	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-R7	Oppose	Disallow	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.	Accept in part
SO78.3	BP, Mobil and Z Energy (The Fuel Companies)			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.	Accept in part
SO78.3	BP, Mobil and Z Energy (The Fuel Companies)	FS06.8	Kāinga Ora	SO78.3	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-R8	Oppose	Disallow	impose non-complying activities. 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.	Accept in part
SO78.4	BP, Mobil and Z Energy (The Fuel Companies)			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.	Accept in part
SO78.4	BP, Mobil and Z Energy (The Fuel Companies)	FS06.9	Kāinga Ora	SO78.4	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-R17	Oppose	Disallow	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	Reject
SO78.5	BP, Mobil and Z Energy (The Fuel Companies)			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. 5. Reverse sensitivity effects on adjoining non-residential sites.	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.	Accept in part
SO78.5	BP, Mobil and Z Energy (The Fuel Companies)	FS01.2	Leith Consulting Limited	SO78.5	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-S3	Support	Allow	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.	Accept in part
SO78.5	BP, Mobil and Z Energy (The Fuel Companies)	FS06.10	Kāinga Ora	SO78.5	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-S3	Oppose	Disallow	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.	Accept in part
SO78.6	BP, Mobil and Z Energy (The Fuel Companies)			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. 5. Reverse sensitivity effects on adjoining non-residential sites.	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.	Accept in part
SO78.6	BP, Mobil and Z Energy (The Fuel Companies)	FS01.2	Leith Consulting Limited	SO78.6	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-S4	Support	Allow	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.	Accept in part

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SO78.6	BP, Mobil and Z Energy (The Fuel Companies)	FS06.11	Kāinga Ora	SO78.6	BP, Mobil and Z Energy (The Fuel Companies)	MRZ-S4	Oppose	Disallow	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	Accept
SO79.1	Stephen			SO79.1	Stephen Haslett	MRZ-O2(i)	Amend	Not stated	Not stated	Reject
SO79.2	Stephen Haslett			SO79.2	Stephen Haslett	MRZ-O4	Amend	Not stated	Not stated	Reject
SO79.3	Stephen Haslett			SO79.3	Stephen Haslett	MRZ-P6	Amend	Not stated	Not stated	Reject
SO79.4	Stephen Haslett			SO79.4	Stephen Haslett	Zone extent	Amend	Sections adjacent to the river with access from Dittmer Drive and Buick Crescent should be excluded from the zone unless an existing erosion risk is addressed.	No explicit mention of floods in the plan change. Surprised that an area in Awapuni between Whikiriwhi Crescent and Buick Crescent and adjacent to the Manawatū River has been included as this area is flood prone. Water reticulation and sewage disposal may be problematic in areas that were established as lower density housing and this is exacerbated during floods. Will developers meet this cost or will it be added to rates?	Reject
SO80.1	Martin Diprose			SO80.1	Martin Diprose	Zone extent	Amend	Remove 158-170A Victoria Avenue from the MDRZ.	Because they are not within 800m of a shopping centre.	Reject
SO81.1	Jenifer Mark			SO81.1	Jenifer Mark	MRZ-S2	Oppose	Increase proposed distance from boundary for 2 & 3-storey dwellings.	At proposed 1.5m from boundary for 6.5m high dwelling (& similarly, distance for 9m high) is too close in terms of effects of reduced sun & sunlight as well as privacy for neighbours on sections with small distances from their dwelling to their boundaries (eg. in my case, I could have a 6.5m dwelling 4m on NE side 4m from my property wall).	Reject
SO82.1	Lance Keall			SO82.1	Lance Keall	MRZ-S1	Amend	Reduce height control to single storey buildings	People's privacy in their own home and surroundings.	Reject
SO83.1	Taine Leader			SO83.1	Taine Leader	Zone extent	Support	Retain inclusion of Roslyn in the zone extent	Improving medium density capability will have significant positive benefits for our community.	Accept
SO84.1	Grant Baldwin			SO84.1	Grant Baldwin	MRZ-S2	Amend	Add provisions for buildings not blocking sun, i.e. lower limits on the south side of plots	So a three storey building doesn't block a neighbouring property's sun.	Reject
SO85.1	Stuart N Lange			SO85.1	Stuart N Lange	MRZ-S2	Amend	Housing on existing residential boundaries to be single level to retain existing occupant's privacy and environment.	Three-storey housing will impact on privacy and our environment.	Reject
SO86.1	Richard Sheehan			SO86.1	Richard Sheehan	MRZ-S1	Oppose	Minimal height increase especially near boundaries.	Because of the impact on neighbouring properties.	Reject
SO87.1	Sharyn Noldan			SO87.1	Sharyn Noldan	MRZ-S2	Amend	Lower height in relation to boundary or increase setback from boundary to more than 1m	An 11m structure built to the minimum 1m boundary would seriously encroach our property and privacy. It would cause disruption to the tenants if such structures were allowed on neighbouring properties.	Reject
SO88.1	Pam Marks			SO88.1	Pam Marks	MRZ-S1	Amend	Reduce the height.	11m buildings dwarfs existing houses, impacting privacy, noise and sunlight.	Reject
SO88.2	Pam Marks			SO88.2	Pam Marks	MRZ-S2	Amend	Increase distance from boundaries - sunlight reduction and daylight are important in creating liveable houses.	A 1m setback from the boundary impacts privacy, noise and sunlight for existing houses.	Reject
SO88.3	Pam Marks			SO88.3	Pam Marks	MRZ-R7	Amend	Three houses on a site need proper planning and design that factors in what the houses are like to live in and the impact on neighbours above short term housing solutions and profit	No specific reason.	Reject
SO89.1	Mai Wiki-Holland			SO89.1	Mai Wiki-Holland	Entire Plan Change	Oppose	Delete the plan change.	Everything is bad, the 1m spacing is terrible and the fact a developer can build a three story house next to a single story house is terrible, not to mention south street is a packed street with schooling and a rather well off street, this is only going to devalue the street, the home owners will all sell up and this street is going to go downhill.	Reject
SO90.1	Neil Stirling			SO90.1	Neil Stirling	Zone Extent	Amend	Reassessment of the designated map areas to exclude any street that does not have the facility to expand on-street parking facilities for new developments, while not impacting the existing residents amenity	The zone extent does not take into account: - existing street amenity - existing street width, for example South St and Campbell St are narrower than surrounding streets - increased demand for on-street parking, which means children not about to see behind stacked cars parked on the verge and over the road and blocking fire-trucks, and there will be a criminal element introduced.	Reject
SO91.1	Wendy Stewart			SO91.1	Wendy Stewart	MRZ-S3	Oppose	Delete	Houses should be further than 1 metre from the boundary line	Reject

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SO91.2	Wendy Stewart			SO91.2	Wendy Stewart	MRZ-S1	Oppose	Delete	Houses should have height control.	Reject
SO92.1	Raymond Robinson			SO92.1	Raymond Robinson	MRZ-S1	Amend	Decrease house heights to single storey	Homes up to 3 storey or 11 metres will have a major impact to neighbouring properties, particularly in relation to sun cover. This will also impact on personal privacy.	Reject
SO93.1	Grant Binns			SO93.1	Grant Binns	MRZ-S1	Oppose	Limit 11m to high density areas only. Otherwise only single storey, with a resource consent required for two-storey in certain areas.	Three storey development should be reserved for high density areas only, as 11m high buildings in established local neighbourhoods will destroy the ambience of that community and they wouldn't meet the Council's Urban Design rules for streetscape impact. There will be a loss of privacy for existing homeowners, and a negative impact on indoor and outdoor living space for existing properties. This has a negative impact on property value. The Council rules do not control the invasion of privacy.	Reject
SO93.2	Grant Binns			SO93.2	Grant Binns	MRZ-P4	Oppose	Multi-unit developments must have off street parking	Many of the streets in the proposed MDZ are not wide enough to handle additional car parking from intensification and this will have a major impact on the established local community. More cars in narrow streets will create access problems for larger or longer vehicles such as a fire engine or ambulance, or an existing resident towing a trailer or caravan. More cars in the street will also create visibility issues for people cross the road (especially children) and additional hazards for people on bikes. If there's no off-street parking required, how will electric cars being charged?	Reject
SO93.3	Grant Binns			SO93.3	Grant Binns	Stormwater Overlay	Oppose	Require that 35% of the city is protected by detention systems	Existing stormwater detention systems are design to overflow in high rainfall events, which will cause more flooding. The systems are hard to maintain. Council needs to increase network capacity by building in significant detention capacity to create a more reliable means of controlling stormwater.	Reject
SO93.4	Grant Binns			SO93.4	Grant Binns	SUB-MRZ-R1	Amend	A sewer capacity plan should be required for development	There needs to be more capacity in both the wastewater network and in the processing and disposal facilities, to handle additional waste from intensification.	Reject
SO93.5	Grant Binns			SO93.5	Grant Binns	Entire Plan Change	Support	Focus new development on greenfield areas such as Kikiwhenua and Kakatangiata.	Council should borrow against development contributions and future rates to provide the budget for network services in the proposed greenfield areas. This would be more beneficial to ratepayers than having a 3 storey building dumped next door that they have no say about.	Reject
SO94.1	Ronald Raghwan			SO94.1	Ronald Raghwan	Entire Plan Change	Support	Remove the heritage height control	Set too low and does not support sustainable house and resource management. It is out of touch with similar cities around the world.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO95.1	Sandra Powell			SO95.1	Sandra Powell	Zone extent	Amend	Include 29 Parata Street in the MRZ.	29 Parata Street is a corner site of 721 sqm and lends itself well to a medium density residential zone. The property sits just outside of the proposed plan change. Properties have been identified for inclusion in the new zone based on their walkable distance to: <ul style="list-style-type: none"> • bus stops (within 500m). 29 Parata Street is around 300m from the nearest bus stop • parks or reserves (within 400m). 29 Parata Street is around 400m to Caccia Birch House, and around 650m to Jickell St tennis courts and sports ground. Caccia Birch house is open to the public, dogs are allowed and it sits on 3 acres of established grounds and gardens. • schools (within 800m). 29 Parata Street is around 650m to the rear entry of College Street Normal School (off Karaka Street). We used this entry for our 10 years of attendance. • a shopping centre (within 800m). 29 Parata Street is around 800m to the shopping centre at Hokowhitu Village (to nearest shop: KNEAD Bakery) . The village encompasses a Four Square, cafe, bakery, restaurants, pharmacy and medical practice which in recent years has become very popular and widely used. A diary and takeaways is located 190m away on the intersection of Park Road and Marne St. 	Reject
SO96.1	Michael Andrews			SO96.1	Michael Andrews	MRZ-S1	Amend	Restrict height to avoid privacy or nuisance issues when overlooking other property backyards and consider general risk.	For example where a 2 or 3 story build - upper levels view into a backyard area with a pool or spa. Privacy could be affected plus potential shadow or light reflection. Could also be a dominant build if other surrounding properties are single story. Consider potential future impact of whether medium density housing will create future slum areas and is there a climate risk hazard of placing housing closer together (e.g. fire risk).	Reject
SO96.2	Michael Andrews			SO96.2	Michael Andrews	MRZ-S2	Amend	Restrict height to avoid privacy or nuisance issues when overlooking other property backyards and consider general risk.	For example where a 2 or 3 story build - upper levels view into a backyard area with a pool or spa. Privacy could be affected plus potential shadow or light reflection. Could also be a dominant build if other surrounding properties are single story. Consider potential future impact of whether medium density housing will create future slum areas and is there a climate risk hazard of placing housing closer together (e.g. fire risk).	Reject
SO97.1	Rajwinder Harike			SO97.1	Rajwinder Harike	Entire Plan Change	Support	Retain as notified	Increased supply of housing.	Accept
SO98.1	Richard Prasad			SO98.1	Richard Prasad	Entire Plan Change	Support	Not stated	Not stated	Accept
SO99.1	Gladys Vining			SO99.1	Gladys Vining	Entire Plan Change	Amend	Better information from Council to enable a submission.	The maps are insufficient.	Reject
SO100.1	Olesia Apostolova			SO100.1	Olesia Apostolova	Zone extent	Support	Include 22 Haydon Street in the MRZ	Unclear why properties directly across the road from the zone weren't included, i.e. at 22 Hayden Street.	Reject
SO101.1	Miranda Sage			SO101.1	Miranda Sage	Entire Plan Change	Oppose	Delete the plan change.	Concerned views will be impacted as height controls are too low.	Reject
SO102.1	David Bunckenburg			SO102.1	David Bunckenburg	Entire Plan Change	Amend	Re-write so the plan change can be understood by code and AI.	To supercharge the regulatory process.	Reject
SO103.1	Doug Strachan			SO103.1	Doug Strachan	Entire Plan Change	Amend	Take into consideration the effect on traffic congestion	Denser housing, including at nearby 17 Summerhays rezoning is going to result in more cars on the road, where it is sometimes difficult to exit Worsfold Lane. Does the roading network support more houses in the area?	Reject

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SO104.1	Hern Teo-Sherrell			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 car parks 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.	Reject
SO104.1	Hern Teo-Sherrell	FS06.12	Kāinga Ora	SO104.1	Hern Teo-Sherrell	Entire Plan Change	Oppose	Disallow	Kāinga Ora oppose any provisions requiring a ratio or mix of private and social housing. Tenure of dwellings is not a RMA matter.	Accept
SO104.2	Hern Teo-Sherrell			SO104.2	Hern Teo-Sherrell	MRZ-S3	Amend	Garages should be set back further than 5.5m	So that vehicles parked outside the garage do not block footpaths.	Reject
SO104.3	Hern Teo-Sherrell			SO104.3		MRZ-S20	Amend	Minimum fence heights and type of fence should allow residents to interact, and to reduce burglaries. Low well-maintained hedges could be an alternative.	Not stated	Accept
SO104.4	Hern Teo-Sherrell			SO104.4	Hern Teo-Sherrell	Entire Plan Change	Amend	Immediate neighbours should be notified of construction of new buildings.	Sometimes, immediate neighbours know more about stormwater easements and potential shade cast on their properties than developers or the council as there may not be adequate consultation or reliable records kept on existing properties.	Reject
SO104.5	Hern Teo-Sherrell			SO104.5	Hern Teo-Sherrell	Entire Plan Change	Amend	Rules have to be changed with regard to the playing of music, the number and type of pets allowed, vehicle noise, and any noise that might impact on neighbours. Also, any street with a higher density of residents should have their street blocked off with a cul-de-sac to enable neighbours to meet and have street activities.	As streets get more built up, and the number of people increase within a small area, noise control regulation needs to be revised to ensure there is minimal impact on residents' right to enjoy peace and quietness in their own homes. Cul-de-sacs would help engage neighbours to get to know one another in order to reduce crime and care for one another. Alternatively, an area should be set aside for such street events to take place, e.g. a small community park.	Reject
SO104.6	Hern Teo-Sherrell			SO104.6	Hern Teo-Sherrell	MRZ-S9	Amend	Provision of more permeable surfaces for rainwater absorption and green space instead of concrete pathways.	Stormwater may flow into blocked drains or overwhelm the discharge and treatment systems due to the density of the new buildings. This may affect properties located on land lower than the others, and cause flooding. The importance of having some land around buildings not covered by concrete is essential for any run-off to be absorbed into the soil. On-site green space would also encourage residents to have vegetable gardens or fruit trees.	Reject
SO105.1	Murray Kidd			SO105.1	Murray Kidd	MRZ-S1	Amend	No height increase.	The proposed height may affect adjacent units light values and this needs to be considered with layout.	Reject
SO105.2	Murray Kidd			SO105.2	Murray Kidd	Stormwater Overlay	Amend	The storm water distribution, or the opening of the flood gates needs to be reevaluated to open earlier.	Water lying under the floor space leads to rot and dampness.	Reject
SO105.3	Murray Kidd			SO105.3	Murray Kidd	Entire Plan Change	Amend	Not stated	Parking- this needs to be valued for occupancy to ensure access for residents and Emergency services is readily available.	Reject
SO106.1	David Jochem Investments Ltd			SO106.1	David Jochem Investments Ltd	Zone extent	Amend	Include 525 Ruahine Street in the MRZ	This property is immediately adjacent to the MRZ. Inclusion would result in a more harmonious integration between different housing types.	Reject

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SO107.1	Powerco Limited			SO107.1	Powerco Limited	MRZ-O5	Support	Retain MRZ-O5	Powerco supports mitigating reverse sensitivity effects of subdivision, use and development which is located adjacent to infrastructure.	Accept
SO107.2	Powerco Limited			SO107.2	Powerco Limited	MRZ-P11	Support	Retain as notified	Powerco supports appropriate setbacks and design controls to achieve appropriate protection of infrastructure, and supports all future buildings, earthworks and construction activities maintaining safe electrical clearance distances in compliance with the New Zealand Electrical Code of Practice for electrical safe distances (NZECP 34:2001).	Accept in part
SO107.3	Powerco Limited			SO107.3	Powerco Limited	MRZ-R8	Amend	Add an additional matter of discretion: 2. Whether there is a need to provide space on the development site for the provision of essential services	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.	Accept in part
SO107.3	Powerco Limited	FS06.13	Kāinga Ora	SO107.3	Powerco Limited	MRZ-R8	Oppose	Disallow	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	Reject
SO107.4	Powerco Limited			SO107.4	Powerco Limited	MRZ-R19	Amend	Permitted activity status needs to be re-numbered to 1. 2-1. Activity status: Permitted	Powerco notes a minor formatting amendment is required to the rule.	Accept
SO107.5	Powerco Limited			SO107.5	Powerco Limited	Section 5.4(d)	Support	Retain the following text within 5.4(d): Powerco Limited (where the application involves works within the safe clearance requirements in the NZCEP34:2001)	Any building works that are to occur within the vicinity of overhead electricity distribution lines needs to be discussed with Powerco.	Accept
SO108.1	Janet Shepherd			SO108.1	Janet Shepherd	MRZ-S1	Oppose	Retain current 9m height maximum.	Three storey residential building in Ashurst will spoil the rural character of the village.	Reject
SO108.2	Janet Shepherd			SO108.2	Janet Shepherd	MRZ-R7	Amend	Require sufficient room on a site for car parking for properties in Ashurst.	Residents cannot rely on public transport to get into the city as the bus service is not frequent enough.	Reject
SO109.1	Richard Houston			SO109.1	Richard Houston	MRZ-S1	Oppose	Keep maximum height the same as in the Residential Zone	Concerned that extra height will cause loss of sunlight/natural light and dominance of a high building.	Reject
SO109.2	Richard Houston			SO109.2	Richard Houston	MRZ-S2	Oppose	Keep the height recession planes the same as in the Residential Zone	Concerned that extra height will cause loss of sunlight/natural light and dominance of a high building.	Reject
SO109.3	Richard Houston			SO109.3	Richard Houston	MRZ-S3	Oppose	Keep the setback requirements the same as in the Residential Zone	Concerned about effects of building close to boundaries	Reject
SO110.1	Craig Mitchell			SO110.1	Craig Mitchell	MRZ-S1	Oppose	Maximum height should be restricted to two-storeys	We have land around the boundaries of our small city use that Land we don't need the social problems of jamming people into smaller areas.	Reject
SO111.1	Brent Norrish			SO111.1	Brent Norrish	MRZ-S2	Oppose	Reduce the height allowance	Building 11 metres high, and with increasing intensity, will turn our beautiful city into a concrete jungle. The peace and serenity our views create will be gone, and detract from the mental health benefits of a beautiful city with refreshing views.	Reject
SO111.2	Brent Norrish			SO111.2	Brent Norrish	MRZ-S3	Oppose	Do not allow building houses closer together with smaller sections sizes.	Building houses closer together with small section sizes has many disadvantages that are not being seriously considered, such as increase conflict and lack of space for exercise, play and gardening.	Reject
SO111.3	Brent Norrish			SO111.3	Brent Norrish	Stormwater Overlay	Oppose	Improve stormwater facilities on other areas too.	The section of Linton Street that runs from Ferguson St to College St frequently floods. The storm water system is unable to cope, and cars have been flooded above there floors and carpets and engines ruined on a regular basis. Increasing the density in the area will only make matters worse.	Reject
SO112.1	David Hillary			SO112.1	David Hillary	Zone Extent	Oppose	Remove Spilman Place from MRZ	as a narrow cul-de-sac, it is not appropriate to allow new construction without adequate on-site parking. Medium density housing with corresponding cars parked on both sides of the narrow street will block access for emergency vehicles.	Reject

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SO113.1	Rory Blatchford			SO113.1	Rory Blatchford	MRZ-S1	Amend	Increased height should be confined to 'new' areas, not including existing housing areas.	The proposed increase in height will intensify negative urban living issues by screening sunlight from existing dwellings, gardens, patios, etc. In addition, increased residential noise, street traffic, parked vehicle congestion, etc. will occur.	Reject
SO114.1	Susanne Aldrich			SO114.1	Susanne Aldrich	MRZ-S2	Oppose	Not stated	This will intrude on the privacy of the neighbouring properties.	Reject
SO114.2	Susanne Aldrich			SO114.2	Susanne Aldrich	MRZ-R7	Oppose	Protect more old homes. At present there are only 45 homes that have some protection in the city. Protect streets that have a style of architecture that adds beauty and value to the city. For instance, Mere Mere Avenue, Langston Avenue...	It is up to the Council to show respect and value for heritage and history within the city, and to protect this for future generations to enjoy.	Reject
SO114.3	Susanne Aldrich			SO114.3	Susanne Aldrich	Standards	Oppose	Provision for garaging or off-street parking should be mandatory for each new dwelling.	A site with three dwellings could have residents with at least 3 cars which would create congestion in the street and cause ongoing problems for others who live in the street.	Reject
SO115.1	Sarah Ruawai			SO115.1	Sarah Ruawai	Entire Plan Change	Oppose	Delete the plan change.	We have friends who are in the police force who have made us aware of the criminal trouble that occurs in these housing situations and we DO NOT want this in behind us or around us.	Reject
SO115.2	Sarah Ruawai			SO115.2	Sarah Ruawai	Entire Plan Change	Oppose	Delete the plan change.	We have a beautiful house that will be devalued by the building of this housing complex.	Reject
SO115.3	Sarah Ruawai			SO115.3	Sarah Ruawai	Entire Plan Change	Oppose	Delete the plan change.	This type of housing would be devalue the area.	Reject
SO116.1	Kevin and Ngaire Smidt			SO116.1	Kevin and Ngaire Smidt	MRZ-P1	Oppose	Restrict areas where more noisy type activities likely Require maximum permissible area of total site. Increase separation between buildings and facilities from boundary with adjacent residential properties	Wording too vague and too large a part of city affected. Needs to clarify around "compatible with built form" Likely to be noisy and disturbed with many people coming and going- not compatible with quiet enjoyment	Reject
SO116.2	Kevin and Ngaire Smidt			SO116.2	Kevin and Ngaire Smidt	MRZ-P2	Oppose	Delete	No residential activities or buildings that do not meet "permitted activity standards" should be permitted. The wording is too vague and too large a part of city is affected for such a gross relaxation of reasonable standards to be permitted.	Reject
SO116.3	Kevin and Ngaire Smidt			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	Reject
SO116.3	Kevin and Ngaire Smidt	FS06.14	Kāinga Ora	SO116.3	Kevin and Ngaire Smidt	MRZ-P3	Oppose	Disallow	Kāinga Ora oppose the inclusion of noise standards in relation to the number of dwellings.	Accept
SO116.4	Kevin and Ngaire Smidt			SO116.4	Kevin and Ngaire Smidt	MRZ-P4	Support	Not stated	Not stated	Accept in part
SO116.5	Kevin and Ngaire Smidt			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	Accept in part
SO116.5	Kevin and Ngaire Smidt	FS06.15	Kāinga Ora	SO116.5	Kevin and Ngaire Smidt	MRZ-P5	Oppose in part	Disallow	Kāinga Ora support MRZ-P5 as proposed, noting the operational need for some activities to be located in the residential zone.	Accept
SO116.6	Kevin and Ngaire Smidt			SO116.6	Kevin and Ngaire Smidt	MRZ-P6	Support	But add: 5. That sites lying in or adjacent to existing ponding areas where building was previously prohibited be subject to rigorous flooding risk assessment and mitigation thereof. 6 Add that preventive measures may not be subsequently impaired	People change things over time and cover areas increasingly with paving impermeable drives etc.	Accept in part
SO116.7	Kevin and Ngaire Smidt			SO116.7	Kevin and Ngaire Smidt	MRZ-P7	Oppose	But add: 5. That sites lying in or adjacent to existing ponding areas where building was previously prohibited be subject to rigorous flooding risk assessment and mitigation thereof. 6 Add that preventive measures may not be subsequently impaired	Council is already approving developments which were not allowed in the past- these sites are actually often very wet with ponding at times and considerable risk- also prevent run off from existing properties	Reject

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SO116.8	Kevin and Ngaire Smidt			SO116.8	Kevin and Ngaire Smidt	MRZ-P13	Amend	A marae, being a centre for large numbers of attendees and functions lasting up to several days would need attention paid to: Distance from residential areas. Air noise control Appropriate road access reducing likelihood of interfering with general traffic flow. Adequate on-site parking Regarding papakainga, see response to MRZ P2	Not stated	Reject
SO116.9	Kevin and Ngaire Smidt			SO116.9	Kevin and Ngaire Smidt	MRZ-R1	Oppose	Needs to be more definition around this	Not stated	Reject
SO116.10	Kevin and Ngaire Smidt			SO116.10	Kevin and Ngaire Smidt	MRZ-R2	Amend	Add requirement for adequate on-site parking	Not stated	Reject
SO116.11	Kevin and Ngaire Smidt			SO116.11	Kevin and Ngaire Smidt	MRZ-R3	Support	Not stated	Not stated	Accept in part
SO116.12	Kevin and Ngaire Smidt			SO116.12	Kevin and Ngaire Smidt	MRZ-R4	Amend	Limit on numbers of residents and cars	Unclear if 3 employees is number on-site at any one time or total employed.	Reject
SO116.13	Kevin and Ngaire Smidt			SO116.13	Kevin and Ngaire Smidt	MRZ-R5	Support	Not stated	Not stated	Accept in part
SO116.14	Kevin and Ngaire Smidt			SO116.14	Kevin and Ngaire Smidt	MRZ-R6	Support	Not stated	Not stated	Accept in part
SO116.15	Kevin and Ngaire Smidt			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.	Reject
SO116.15	Kevin and Ngaire Smidt	FS06.14	Kāinga Ora	SO116.15	Kevin and Ngaire Smidt	MRZ-R7	Oppose	Disallow	Kāinga Ora oppose the inclusion of additional restrictions on papakāinga or similar housing.	Accept
SO116.16	Kevin and Ngaire Smidt			SO116.16	Kevin and Ngaire Smidt	MRZ-R8	Oppose	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. Could be multiple businesses run from homes.	Reject
SO116.17	Kevin and Ngaire Smidt			SO116.17	Kevin and Ngaire Smidt	MRZ-R9	Oppose	Should not be allowed automatically	To address concerns about unauthorised changes	Reject
SO116.18	Kevin and Ngaire Smidt			SO116.18	Kevin and Ngaire Smidt	MRZ-R10	Oppose	Mitigation is not sufficient to address demands on stormwater management.	There is increased risk to properties from flooding.	Reject
SO116.19	Kevin and Ngaire Smidt			SO116.19	Kevin and Ngaire Smidt	MRZ-R11	Amend	Include compliance with MRZ-S9 and MRZ-S10 and define whether an accessory building is a granny flat, sleepout or garden shed.	Not stated	Accept in part
SO116.20	Kevin and Ngaire Smidt			SO116.20	Kevin and Ngaire Smidt	MRZ-R12	Amend	Add indication of number to be educated in relation to land area and adequacy of facilities for the number	To avoid inappropriate density, noise, traffic disturbance in neighbourhood.	Reject
SO116.21	Kevin and Ngaire Smidt			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	Reject
SO116.21	Kevin and Ngaire Smidt	FS06.15	Kāinga Ora	SO116.21	Kevin and Ngaire Smidt	MRZ-R13	Oppose	Disallow	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	Accept
SO116.22	Kevin and Ngaire Smidt			SO116.22	Kevin and Ngaire Smidt	MRZ-R14	Support	Not stated	Not stated	Accept in part
SO116.23	Kevin and Ngaire Smidt			SO116.23	Kevin and Ngaire Smidt	MRZ-R15	Support	Not stated	Not stated	Accept in part
SO116.24	Kevin and Ngaire Smidt			SO116.24	Kevin and Ngaire Smidt	MRZ-R16	Oppose	Should be limited to parts of the city. If approved, need to pay attention to: Distance from residential areas. Air noise control Appropriate road access reducing likelihood of interfering with general traffic flow. Adequate on-site parking	Wording too vague and too large a part of city affected. Likely to be noisy and disturbed with many people coming and going- not compatible with quiet enjoyment	Reject

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SO116.25	Kevin and Ngaire Smidt			SO116.25	Kevin and Ngaire Smidt	MRZ-R17	Support	Not stated	Not stated	Accept in part
SO116.26	Kevin and Ngaire Smidt			SO116.26	Kevin and Ngaire Smidt	MRZ-R18	Support	Not stated	Not stated	Accept in part
SO116.27	Kevin and Ngaire Smidt			SO116.27	Kevin and Ngaire Smidt	MRZ-R19	Support	Not stated	Not stated	Accept
SO116.28	Kevin and Ngaire Smidt			SO116.28	Kevin and Ngaire Smidt	MRZ-R20	Support	Not stated	Not stated	Accept in part
SO116.29	Kevin and Ngaire Smidt			SO116.29	Kevin and Ngaire Smidt	MRZ-R21	Support	Not stated	Not stated	Accept
SO116.30	Kevin and Ngaire Smidt			SO116.30	Kevin and Ngaire Smidt	MRZ-R23	Oppose	Exempt good quality zinc cladding	In Palmerston North the distance from the sea and the absence of heavy industry producing acidic effluents result in very low loss of zinc coating of unpainted cladding.	Reject
SO116.31	Kevin and Ngaire Smidt			SO116.31	Kevin and Ngaire Smidt	MRZ-R24	Support	Not stated	Not stated	Accept in part
SO116.32	Kevin and Ngaire Smidt			SO116.32	Kevin and Ngaire Smidt	MRZ-S1	Amend	Should not shade adjacent building's sun in winter between 9 am and 4pm	It is not clear that there will not be excessive shading of adjacent buildings.	Reject
SO116.33	Kevin and Ngaire Smidt			SO116.33	Kevin and Ngaire Smidt	MRZ-S2	Amend	Should not shade adjacent building's sun in winter between 9 am and 4pm	It is not clear that there will not be excessive shading of adjacent buildings.	Reject
SO116.34	Kevin and Ngaire Smidt			SO116.34	Kevin and Ngaire Smidt	MRZ-S3	Amend	Accessory buildings higher than 2 metres should be included.	Shade, privacy, appearance	Accept
SO116.35	Kevin and Ngaire Smidt			SO116.35	Kevin and Ngaire Smidt	MRZ-S4	Amend	Include all impermeable structures, covered or uncovered in the 50% maximum building requirement.	Uncovered impermeable decking and other impermeable structures reduce stormwater absorption by soil.	Reject
SO116.36	Kevin and Ngaire Smidt			SO116.36	Kevin and Ngaire Smidt	MRZ-S5	Amend	Delete the requirement for growth to 4 metre height within 5 years. Express preference for deciduous trees or large shrubs (less shade in Winter) Require avoidance of trees well known for entering water drainage systems or having large sub-surface roots.	In New Zealand many trees capable of growing to 4 metres within 5 years will become problematic in the long term.	Reject
SO116.37	Kevin and Ngaire Smidt			SO116.37	Kevin and Ngaire Smidt	MRZ-S14	Support	Not stated	Not stated	Accept
SO116.38	Kevin and Ngaire Smidt			SO116.38	Kevin and Ngaire Smidt	MRZ-S15	Oppose	Delete sections a and b	It is possible to have a garage and front parking area designed such that all manoeuvring is easily done on-site such that vehicles can enter and leave the property forwards.	Reject
SO116.39	Kevin and Ngaire Smidt			SO116.39	Kevin and Ngaire Smidt	MRZ-S18	Support	But why just 1 bike?	A family may have several bikes.	Accept
SO116.40	Kevin and Ngaire Smidt			SO116.40	Kevin and Ngaire Smidt	MRZ-S19	Support	Not stated	Not stated	Accept in part
SO116.41	Kevin and Ngaire Smidt			SO116.41	Kevin and Ngaire Smidt	MRZ-S20	Amend	Strongly support clause 3	Exiting vehicles need to be able to see pedestrians and vice versa - actually for last 2.5m of fence before footpath fence should have visibility through it or be no higher than 800mm of the side and any adjacent perpendicular fence	Accept in part
SO116.42	Kevin and Ngaire Smidt			SO116.42	Kevin and Ngaire Smidt	MRZ-S21	Support	Not stated	Not stated	Accept in part
SO117.1	Ash Garstang			SO117.1	Ash Garstang	Zone Extent	Amend	Amend the zone extent so it doesn't cut through the middle of residential blocks	Back to back neighbours are impacted where one can increase density and get the commercial benefit and the other can't and suffers the effects.	Reject
SO118.1	Nigel Hughes			SO118.1	Nigel Hughes	Zone Extent	Amend	Include property at corner of Tutaki and Kelvin Grove Roads in the zone.	The site is not impacted by air noise, the soil is poor quality and the site is in proximity amenities and the proposed rail hub. There are existing water and sewage services.	Reject

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SO118.1	Nigel Hughes	FS05.1	Palmerston North Airport Limited	SO118.1	Nigel Hughes	Zone Extent	Oppose	Retain zone extent in this location	PNAL opposes further intensification of residential development within the inner and outer noise contour.	Accept
SO119.1	Sam Irvine			SO119.1	Sam Irvine	MRZ-R7	Amend	The number of units should be a least 4, and preferably 6.	I fully support this move to allowing medium density zoning, and favour the 6 unit limit that was previously proposed. As a compromise, allowing at least 4 units allows two double-story units per site.	Reject
SO120.1	Lizi Guest			SO120.1	Lizi Guest	MRZ-S1	Oppose	Buildings to 11m high in a heritage area are imposing.	Taller buildings in heritage areas should be set back further from properties boundaries to maintain privacy and retain the heritage feel of a street.	Reject
SO121.1	Kevin Kelliher			SO121.1	Kevin Kelliher	MRZ-R7	Amend	The number of units should be based on the site area, with a 35% building coverage and minimum 70m2 floor area for each unit. Alternatively allow more intensive site coverage within 1.5m of The Square and lower site coverage between 1.5-3.0km from The Square.	To allow the best usage for absolute inner city developments within 1.5 kilometres of The Square without requiring resource consent.	Reject
SO122.1	Chris Price			SO122.1	Chris Price	Entire Plan Change	Amend	Not stated	There is insufficient on-street parking to support intensification in Hendon Place.	Reject
SO123.1	Nicola Wardlaw			SO123.1	Nicola Wardlaw	Entire Plan Change	Oppose	Not stated	The extra parking on street and extra comings and goings of potentially quite a few new residents in the general area would change the feel of the neighbourhood	Reject
SO124.1	Karina Hapeta			SO124.1	Karina Hapeta	Entire Plan Change	Oppose	Delete the plan change.	There is not enough parking and I don't like the idea of two storey units as it would make the street too busy.	Reject
SO125.1	Shari Scanlon			SO125.1	Shari Scanlon	Entire Plan Change	Support	Do not let families live in these structures as living in close proximity to others can sometimes pose certain anti-social behaviors	Allow these new homes to be for those who work in frontline jobs and middle class families this may be discriminatory but it will save a lot of headache later on.	Reject
SO126.1	Kevin Guan			SO126.1	Kevin Guan	Entire Plan Change	Support	Retain as notified	Not stated	Accept
SO127.1	Rachelle Tangi			SO127.1	Rachelle Tangi	Entire Plan Change	Oppose	Delete the plan change.	The height restriction is too high and is set to block neighbours views and sunlight. There is no capacity in existing health care facilities.	Reject
SO128.1	Jordan Neall			SO128.1	Jordan Neall	Entire Plan Change	Support	There should be a requirement for garages.	So there is space for visitors.	Reject
SO129.1	Roanne Hautapu			SO129.1	Roanne Hautapu	MRZ-R7	Oppose	Developers should be required to advise neighbours before a project starts	Because of the potential for disruption to neighbours.	Reject
SO129.2	Roanne Hautapu			SO129.2	Roanne Hautapu	MRZ-R7	Oppose	Three units on a site should only be built in greenfield areas or besides existing 2 or 3 storey units.	Loss of privacy and peace.	Reject
SO129.3	Roanne Hautapu			SO129.3	Roanne Hautapu	MRZ-S20	Amend	Clarify fence heights	Unclear what the heights are for fencing.	Accept
SO129.4	Roanne Hautapu			SO129.4	Roanne Hautapu	Chapter 10A - Introduction	Amend	Build walking, cycling and public transport infrastructure before intensifying	People already have the choice to walk/bus/bike.	Reject
SO129.5	Roanne Hautapu			SO129.5	Roanne Hautapu	Entire Plan Change	Oppose	Consideration of school capacity	Impacts on school capacity, especially primary.	Reject
SO129.6	Roanne Hautapu			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.	Reject

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SO129.6	Roanne Hautapu	FS06.16	Kāinga Ora	SO129.6	Roanne Hautapu	Entire Plan Change	Oppose	Disallow	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	Accept
SO130.1	Fraser Abernethy			SO130.1	Fraser Abernethy	Entire Plan Change	Oppose	Delete the plan change.	Medium density proposal will significantly detract from people's quality of life in central Palmerston North the height of the buildings will impact people's privacy and the increased density of house will create more flooding risk and congestion on roads and parking in a number areas of the city	Reject
SO131.1	Kathryn Hughes			SO131.1	Kathryn Hughes	MRZ-S2	Amend	Decrease to no more than two storeys.	These height allowances are too high for neighboring properties. Potentially blocking sunlight or views.	Reject
SO131.2	Kathryn Hughes			SO131.2	Kathryn Hughes	MRZ-R7	Amend	Decrease number of dwellings allowed on property from three to two.	Since the property size is smaller, then number of dwellings allowable should be less. Families with children do need some outside space. Not just one metre allowance around dwelling!	Reject
SO132.1	Janet Stirling			SO132.1	Janet Stirling	Entire Plan Change	Support	Retain as notified	Some thought has been given to setting these height restrictions by experts	Accept
SO133.1	Keegan Leask			SO133.1	Keegan Leask	Entire Plan Change	Support	Retain as notified	Denser housing is good for the city.	Accept
SO134.1	Wisanu Srichantra			SO134.1	Wisanu Srichantra	Entire Plan Change	Oppose	Retain as notified	Not stated	Reject
SO135.1	Alan Kirk			SO135.1	Alan Kirk	MRZ-S16	Oppose	Only one access allowed per site.	Less land used or wasted by driveways, less risk to pedestrians and cyclists and more on-street parking.	Reject
SO135.2	Alan Kirk			SO135.2	Alan Kirk	MRZ-S14	Oppose	Amend frontal width requirement	This is quite restrictive and may not be possible to manage.	Reject
SO136.1	Bella Deacon			SO136.1	Bella Deacon	Entire Plan Change	Oppose	Not stated	Not stated	Reject
SO137.1	Rangitāne o Manawatū			SO137.1	Rangitāne o Manawatū	Chapter 10A - Introduction	Support	Retain following text as drafted: "The Medium Density Zone supports the physical and spiritual health of our Māori whānau, enabling them to practice their culture and provide for their tikanga*. This includes providing safe access* to the landscapes and urban waterways valued by their tīpuna, enabling the development* of papakāinga* and recognising and celebrating our cultural connections with te taiao and Rangitāne whakapapa through urban design. "	This text reflects Rangitāne feedback via the Clause 3b process.	Accept
SO137.2	Rangitāne o Manawatū			SO137.2	Rangitāne o Manawatū	MRZ-O1	Support	Retain as notified	Rangitāne support the objective to enable papakāinga developments within the Medium Density Zone.	Accept
SO137.3	Rangitāne o Manawatū			SO137.3	Rangitāne o Manawatū	MRZ-O2	Support in part	Amend the objective so that it refers to supporting a reduction in greenhouse gas emissions, as well as energy efficiency.	Rangitāne consider this objective should be broadened to specifically reference development that supports reductions in greenhouse gas emissions, to give effect to RPS policy UFD-O5 and the NZ Emission Reductions Plan.	Reject
SO137.4	Rangitāne o Manawatū			SO137.4	Rangitāne o Manawatū	MRZ-O3	Support	Retain as notified	Rangitāne support the objective as this articulates our aspiration to improve the mauri of the Manawatū Awa and its lagoons and tributaries	Accept
SO137.5	Rangitāne o Manawatū			SO137.5	Rangitāne o Manawatū	MRZ-O4	Support	Retain as notified	Rangitāne support this objective as it is important that risks to people, property, infrastructure and the environment are avoided, unless they can be appropriately mitigated.	Accept
SO137.6	Rangitāne o Manawatū			SO137.6	Rangitāne o Manawatū	MRZ-O5	Support	Retain as notified	Rangitāne consider effects on infrastructure are an important matter that should be addressed through an objective.	Accept
SO137.7	Rangitāne o Manawatū			SO137.7	Rangitāne o Manawatū	MRZ-O6	Support in part	Retain as notified	Rangitāne support this objective as it reflects our aspirations to manage our land in a way that is consistent with our values and aspirations.	Accept
SO137.8	Rangitāne o Manawatū			SO137.8	Rangitāne o Manawatū	MRZ-P1	Support	Retain as notified	Rangitāne support the reference to papakāinga being an enabled activity in the zone.	Accept
SO137.9	Rangitāne o Manawatū			SO137.9	Rangitāne o Manawatū	MRZ-P2	Support	Retain as notified	Rangitāne supports this policy, as it provides direction for assessment of residential proposals which do not meet the permitted activity standards.	Accept

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SO137.10	Rangitāne o Manawatū			SO137.10	Rangitāne o Manawatū	MRZ-P3	Support	Retain as notified	Rangitāne support site layouts that respond to the site and context, including adjacent waterways. Developments should not 'turn their backs' on urban waterways.	Accept in part
SO137.11	Rangitāne o Manawatū			SO137.11	Rangitāne o Manawatū	MRZ-P4	Support	Retain as notified	Rangitāne support the reference to a requirement for on-site bicycle parking and storage to support mode shift.	Accept in part
SO137.12	Rangitāne o Manawatū			SO137.12	Rangitāne o Manawatū	MRZ-P5	Support	Retain as notified	Non-residential activities should be enabled where they support the needs of local communities and are of a compatible scale and intensity of use.	Accept
SO137.13	Rangitāne o Manawatū			SO137.13	Rangitāne o Manawatū	MRZ-P6	Support in part	Amend so the policy: <ul style="list-style-type: none"> - directs that the impacts of climate change are accounted for when designing on-site mitigation measures. - promotes nature-based solutions in preference over hard engineering solutions. - refers to requiring on-going maintenance and repair of stormwater treatment and mitigation devices - 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. 	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. 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. 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), to implement national guidance/direction.	Accept in part
SO137.13	Rangitāne o Manawatū	FS06.17	Kāinga Ora	SO137.13	Rangitāne o Manawatū	MRZ-P6	Oppose in part	Disallow in part	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.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO137.14	Rangitāne o Manawatū			SO137.14	Rangitāne o Manawatū	MRZ-P7	Support in part	<p>Amend the policy to include:</p> <ul style="list-style-type: none"> - reference to the need to consider the impacts of climate change and future resilience when designing mitigation measures. - Include a direction that nature-based solutions should be adopted in preference over hard engineering solutions where practicable, when recommending mitigation measures. - direction that for those areas where modelling predicts downstream 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. - 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. 	<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 consent notices.</p>	Accept in part
SO137.14	Rangitāne o Manawatū	FS06.18	Kāinga Ora	SO137.14	Rangitāne o Manawatū	MRZ-P7	Oppose in part	Disallow 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. 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. 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>	Reject

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SO137.15	Rangitāne o Manawatū			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"> - 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 -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. <p>To support this management approach, Rangitāne suggests that the Council:</p> <ul style="list-style-type: none"> -Develops, resources and funds a monitoring and compliance programme, building on any existing monitoring programme; -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 District Plan. 	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.	Accept in part
SO137.15	Rangitāne o Manawatū	FS06.19	Kāinga Ora	SO137.15	Rangitāne o Manawatū	New policy	Oppose in part	Disallow 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	Accept
SO137.16	Rangitāne o Manawatū			SO137.16	Rangitāne o Manawatū	MRZ-P8	Support	Retain as notified	Rangitāne support the requirement to address both water quality and quantity through the use of water sensitive design.	Accept
SO137.17	Rangitāne o Manawatū			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.	Accept in part
SO137.17	Rangitāne o Manawatū	FS06.20	Kāinga Ora	SO137.17	Rangitāne o Manawatū	MRZ-P9	Oppose in part	Disallow in part	This is appropriately addressed within the provisions of the PC and should not be within the policy	Accept
SO137.18	Rangitāne o Manawatū			SO137.18	Rangitāne o Manawatū	MRZ-P10	Support in part	Broaden the scope of the policy so that it directs urban design, building form and site layouts which minimise as far as practicable the contribution to climate change of the development and its future use, and increase resilience, including, but not only, through energy efficiency. Reference should be made to water efficiency and waste minimisation, facilitating the use of public and active transport.	As currently worded, the policy is non-aspirational and does not go far enough to give effect to recently adopted regional direction in the RPS, including policy UFD-P8 of the RPS, or the NZ Emission Reductions Plan.	Reject
SO137.19	Rangitāne o Manawatū			SO137.19	Rangitāne o Manawatū	MRZ-P11	Support	Retain as notified	Rangitāne consider reverse sensitivity effects are an important matter that should be addressed through policy.	Accept in part

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SO137.20	Rangitāne o Manawatū			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.	Accept in part
SO137.20	Rangitāne o Manawatū	FS06.21	Kāinga Ora	SO137.20	Rangitāne o Manawatū	MRZ-P12	Oppose in part	Disallow 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.	Accept in part
SO137.21	Rangitāne o Manawatū			SO137.21	Rangitāne o Manawatū	MRZ-P13	Support in part	Broaden the scope of the policy to ensure that where new development includes public or community spaces, the design of those spaces: -enables whānau to safely and readily interact with the natural environment, in particular providing safe access to, and along urban waterways; -Uses natural and recycled materials that support connections with te taiao; -Integrates Māori design and mahi toi - Integrates te reo Māori into signage and any new naming - Ensures access for disabled and elderly (a whānau ora approach where all members of the community can participate)	Rangitāne request that the scope of this policy is broadened, including a reference to enabling our people to safely and readily interact with the natural environment, within urban areas, use natural materials, integrate mahi toi and te reo, and ensure access for all whānau – thereby allowing us to express our cultural traditions and connections.	Accept in part
SO137.22	Rangitāne o Manawatū			SO137.22	Rangitāne o Manawatū	MRZ-R1	Support	Retain as notified	Rangitāne support this permitted activity rule for papakāinga.	Accept
SO137.23	Rangitāne o Manawatū			SO137.23	Rangitāne o Manawatū	MRZ-R7	Support	Amend MRZ-R7-2.3 to include a reference to Policy MRZ-P8, which relates to water sensitive design. This policy is a relevant consideration for considering compliance with the performance standards that address permeable surfaces and stormwater attenuation devices, and is not only applicable in the Stormwater Overlay areas. Amend MRZ-R7-2.3 to include a reference to Policy RMZ-P10 Energy Efficiency.	Rangitāne support this rule, including that the activity status becomes restricted discretionary where there is non-compliance with one or more of the standards of MRZ-R7-1, subject to the relief we have sought on the performance standards MRZ-S9 and MRZ-S10 (see below). Policy MRZ-P8 and P10 are also relevant considerations for decision making under the restricted discretionary rule, and should be referenced.	Accept
SO137.24	Rangitāne o Manawatū			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.	Accept
SO137.24	Rangitāne o Manawatū	FS06.22	Kāinga Ora	SO137.24	Rangitāne o Manawatū	MRZ-R8	Oppose in part	Disallow in part	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. 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.	Reject
SO137.25	Rangitāne o Manawatū			SO137.25	Rangitāne o Manawatū	MRZ-R9	Support in part	Retain as notified	Rangitāne support this rule, which requires additions or alterations to buildings to be subject to the permeable surfaces, stormwater attenuation device, and minimum floor levels performance standards.	Accept in part

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SO137.26	Rangitāne o Manawatū			SO137.26	Rangitāne o Manawatū	MRZ-R10	Support in part	Amend the matters of discretion: -Amend matter 3 to read: "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". -Insert a new matter that gives the Council 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). Insert in the Advice Note, a statement that the requirement for ongoing maintenance may be secured through a consent notice or another legal mechanism.	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). Rangitāne are concerned about the on-going maintenance of stormwater mitigation measures, including who will take responsibility for maintenance, inspections and repairs. Rangitāne consider that if this will be responsibility of the homeowner, this may need to be secured through a consent notice or other legal mechanism.	Accept in part
SO137.27	Rangitāne o Manawatū			SO137.27	Rangitāne o Manawatū	MRZ-R16	Support	Retain as notified	This rule is consistent with Rangitāne standing as mana whenua of Te Papaioea.	Accept in part
SO137.28	Rangitāne o Manawatū			SO137.28	Rangitāne o Manawatū	MRZ-R24	Support in part	Insert an Advice Note, that the requirement for ongoing maintenance may be secured through a consent notice or other legal mechanism.	Rangitāne are concerned about the on-going maintenance of stormwater treatment devices including who will take responsibility for maintenance, inspections and repairs. Rangitāne consider that if this will be responsibility of the homeowner, this may need to be secured through a consent notice or other legal mechanism.	Accept in part
SO137.29	Rangitāne o Manawatū			SO137.29	Rangitāne o Manawatū	MRZ-S5	Amend	Amend the matters of discretion to include reference to the positive effects of landscaping – to improve retention of stormwater, retain soil quality, create shade/shelter and cooling and provide habitat.	Rangitāne consider these are relevant matters for consideration if the standard is infringed.	Accept in part
SO137.30	Rangitāne o Manawatū			SO137.30	Rangitāne o Manawatū	MRZ-S6	Support	Retain as notified	Rangitāne support a requirement for outdoor shaded space being included as a performance standard.	Reject
SO137.31	Rangitāne o Manawatū			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 occupied.	Accept
SO137.31	Rangitāne o Manawatū	FS06.23	Kāinga Ora	SO137.31	Rangitāne o Manawatū	MRZ-S9	Oppose in part	Disallow 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.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO137.32	Rangitāne o Manawatū			SO137.32	Rangitāne o Manawatū	MRZ-S10	Support in part	Amend the standard to require that the attenuation tank is not used for rainwater harvesting, and that a separate tank would need to be provided if rainwater harvesting is intended. Amend the standard to require mechanical pumping of underground attenuation tanks where gravity draining cannot be provided, with contingency measures to be available in the event of pump failure. See also the submission point seeking a new policy that will signal that installation and maintenance of stormwater attenuation devices will be subject to Council compliance checks and ongoing monitoring. Rangitāne seek that this new policy is referenced in an advice note on this Standard.	The Stormwater Servicing Assessment states that it is important that rainwater tanks are designed to empty following a rain event and must not be used for rainwater harvesting (at Section 4.3). As currently drafted, the performance standard does not require this. Rangitāne are concerned about the ability to monitor (including the ability to access private property and ongoing funding for compliance) and maintain the efficacy of stormwater attenuation tanks on an ongoing basis.	Accept in part
SO137.33	Rangitāne o Manawatū			SO137.33	Rangitāne o Manawatū	MRZ-S11	Support	Retain as notified	Rangitāne support the performance standard, including the requirement for access to occupied buildings and structures to be above the 2% AEP flood extent.	Accept in part
SO137.34	Rangitāne o Manawatū			SO137.34	Rangitāne o Manawatū	MRZ-S18	Support	Retain as notified	Rangitāne support the performance standard as it will facilitate increased uptake of active transport.	Accept in part
SO137.35	Rangitāne o Manawatū			SO137.35	Rangitāne o Manawatū	MRZ Notification clauses	Support	That the ability to limited notify applications under these rules is retained.	Limited notification should be retained as there is uncertainty that the provisions will ensure good outcomes. Our 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.	Accept in part
SO137.36	Rangitāne o Manawatū			SO137.36	Rangitāne o Manawatū	SUB-MRZ-O1	Support	Retain as notified	Rangitāne support the matters addressed by this objective, in particular the requirement that land development is serviced by water, wastewater and stormwater infrastructure that has sufficient capacity to accommodate the development.	Accept
SO137.37	Rangitāne o Manawatū			SO137.37	Rangitāne o Manawatū	SUB-MRZ-P1	Support	Amend subpoint 8 so that it refers to retaining and integrating mature vegetation so as to contribute to sustaining ecosystem services, including stormwater retention, air and soil quality, shade and shelter, cooling and habitats.	Rangitāne consider mature vegetation is important for the multiple benefits it provides for shade, shelter, cooling, air quality, habitat, mental health etc. Rangitāne' 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 does not sufficiently recognise or seek to retain the multiple ecoservices of vegetation in an urban context.	Reject
SO137.38	Rangitāne o Manawatū			SO137.38	Rangitāne o Manawatū	SUB-MRZ-P3	Support	Retain as notified	The policy appropriately addresses the need to ensure future development is not adversely affected by natural hazards.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO137.39	Rangitāne o Manawatū			SO137.39	Rangitāne o Manawatū	SUB-MRZ-P4	Support in part	<p>Rangitāne seek the following amendments to the policy: Include a reference to the need to consider the impacts of climate change and future resilience when designing mitigation measures. Include a direction that nature-based solutions should be adopted in preference over hard engineering solutions where practicable, when recommending mitigation measures.</p> <p>Include policy 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, due to the constraints on the existing network and existing downstream flood risk.</p> <p>Include policy 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.</p>	<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 mitigation strategy, to address this. The Assessment identifies that part of that mitigation may include requiring post-development flows to match a fraction (e.g. 80%) of predevelopment flows, due to the constraints on the existing network and existing downstream flood risk.</p> <p>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. It is important that mitigation measures are implemented as designed and maintained in good working order. This should be secured through consent notices.</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 through any development proposal, and the policy should indicate this.</p>	Accept in part
SO137.40	Rangitāne o Manawatū			SO137.40	Rangitāne o Manawatū	SUB-MRZ-R1	Support in part	<p>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.</p> <p>Amend the matters of discretion to:</p> <ul style="list-style-type: none"> -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 	<p>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.</p> <p>The first matter of discretion refers to the effects of earthworks on on-</p>	Accept in part
SO137.40	Rangitāne o Manawatū	FS06.24	Kāinga Ora	SO137.40	Rangitāne o Manawatū	SUB-MRZ-R1	Oppose in part	Disallow in part	<p>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</p>	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO137.41	Rangitāne o Manawatū			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.	Accept
SO137.41	Rangitāne o Manawatū	FS06.25	Kāinga Ora	SO137.41	Kāinga Ora	SUB-MRZ Notification clauses	Oppose in part	Disallow 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.	Accept
SO137.42	Rangitāne o Manawatū			SO137.42	Rangitāne o Manawatū	Definition - Ancestral Land	Support	As proposed this definition will only apply in the Medium Density Zone, but this definition forms part of the proposed amendments to the definition of papakāinga, which will apply across all zones in the plan. Rangitāne seek a consequential amendment to introduce this definition into section 4 as well as section 4A.	Rangitāne support the definition, but the definition should apply across all zones in the district, not just in the Medium Density Residential Zone.	Accept
SO137.43	Rangitāne o Manawatū			SO137.43	Rangitāne o Manawatū	Definition - Papakāinga	Support	Retain as notified	Rangitāne support the proposed amendment to the wording of this operative definition, as it will enable such developments on Māori and whānau land that is not in multiple ownership.	Accept
SO138.1	Christine Rynhart			SO138.1	Christine Rynhart	Entire Plan Change	Oppose	Not stated	Concerned about the suitability of soil conditions in Dittmar Drive for building intensification.	Reject
SO139.1	Ian Craig Stevens			SO139.1	Ian Craig Stevens	Zone Extent	Oppose	Delete Lakemba Park subdivision from the zone extent.	Lakemba Park subdivision was formed to provide single house dwellings on single sections. There is a covenant on all the sections that states "the purchaser shall not do, permit or suffer any of the following, that the land to be further subdivided. Therefore I point out that the councils plans to boost housing in the area goes against this covenant.	Reject
SO140.1	Spencer Lilley and Penelope Tucker			SO140.1	Spencer Lilley and Penelope Tucker	Entire Plan Change	Support	Retain as notified	Provisions will support avoidance and mitigation of negative effects from increased stormwater. The requirement for an on-site specimen tree will help remedy the loss of amenity and biodiversity.	Accept
SO141.1	Deidre Southee			SO141.1	Deidre Southee	Entire Plan Change	Amend	Utilise existing buildings in the inner city for housing and/or increase greenfield development	Increasing housing density (especially in the Vogel Street Roslyn area) will result in: - Increased demand for parking and increased risk of potential accidents and injury - Increased crime unless there is more consistent policing and secure buildings - Loss of privacy - Insufficient areas for play - Insufficient infrastructure capacity and concerns about structural stability/durability for buildings	Reject
SO142.1	Ben van der Spuy			SO142.1	Ben van der Spuy	Zone extent	Oppose	Exclude zones around schools	The areas around schools are already heavily congested, and the increased traffic resulting from the Proposed Plan Change I: Increasing Housing Supply and Choice will only worsen this issue. This added congestion poses a significant safety risk to children and parents, making the school environment more dangerous.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO143.1	Joanne and Robert Wilson			SO143.1	Joanne and Robert Wilson	Entire Plan Change	Amend	Not stated	Concerns with location, consistency with surrounding buildings, design, lack of outdoor space, loss of privacy, lack of storage, parking, ventilation, accessibility for people with disabilities, older people, mobility impaired etc.	Reject
SO143.2	Joanne and Robert Wilson			SO143.2	Joanne and Robert Wilson	Entire Plan Change	Amend	Not stated	The population growth statistics do not reflect the actual population growth in Palmerston North over the last 24 years. Also need to consider migration, immigration and natural attrition along with a declining birth rate.	Reject
SO143.3	Joanne and Robert Wilson			SO143.3	Joanne and Robert Wilson	Entire Plan Change	Amend	Review in light of potential for changed national direction	Pause the plan change whilst wait for the outcome of any review of the National Policy Statement on Urban Development in relation to housing targets.	Reject
SO143.4	Joanne and Robert Wilson			SO143.4	Joanne and Robert Wilson	Entire Plan Change	Oppose	Retain requirement for resource consent for new residential units.	Need to have regulations and safe guards in place.	Reject
SO144.1	Karen Nistor			SO144.1	Karen Nistor	Entire Plan Change	Oppose	Create new greenfield areas or reduce the size of the MRZ.	Concerns with appearance, impacts on property values, loss of light and privacy, reduced air quality, rubbish disposal, energy consumption, poorer health outcomes, traffic congestion and increased crime.	Reject
SO145.1	Shraddha Dabholkar			SO145.1	Shraddha Dabholkar	Entire Plan Change	Oppose	No more houses in the city centre	Traffic congestion	Reject
SO146.1	David Hill			SO146.1	David Hill	Entire Plan Change	Oppose	Delete the plan change.	Don't like medium density living.	Reject
SO147.1	Renee Thurston			SO147.1	Renee Thurston	Entire Plan Change	Oppose	Not stated	Not stated	Reject
SO148.1	Emily Doody			SO148.1	Emily Doody	Entire Plan Change	Amend	Medium density housing should be located in the new areas of the city first, e.g. Kelvin Grove, Summerhill, Fitzherbert	The older areas of Palmerston North have a great deal of inadequate infrastructure. Every suburb should have equal numbers for fairness sake, but also to ensure that we are not creating more denser pockets of crime.	Reject
SO149.1	Steve Carter			SO149.1	Steve Carter	Entire Plan Change	Oppose	Not stated	Concerns about increased flooding risk, construction effects, loss of sunlight, privacy and outlook.	Reject
SO149.2	Steve Carter			SO149.2	Steve Carter	Zone Extent	Oppose	Include areas such as Hunter Street, Catlins Cres, Kaituna and Clearview, as they are within walking distance of schools and bus services.	Building taller buildings in areas that already have them.	Reject
SO150.1	Raewyn Greenlees			SO150.1	Raewyn Greenlees	Zone Extent	Oppose	Exclude Royal Oak Drive and Rosebank Avenue (Lakemba Park)	There are existing restrictive covenants on properties in this subdivision which prevent further subdivision or building more than one dwelling. Also concerns about increased on-street parking.	Reject
SO151.1	Oliver Hannaford			SO151.1	Oliver Hannaford	MRZ-O1	Support	Retain as notified	Increase housing supply	Accept
SO152.1	Kimberly Coates			SO152.1	Kimberly Coates	Entire Plan Change	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.	Reject
SO152.1	Kimberly Coates	FS06.26	Kāinga Ora	SO152.1	Kimberly Coates	Standards	Oppose	Disallow	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.	Accept
SO153.1	Tania Kopytko			SO153.1	Tania Kopytko	Entire Plan Change	Amend	Not stated	Concerns about increase in noise and lack of privacy for established households, requirement for on-site parking..	Reject
SO154.1	Katreena Collins			SO154.1	Katreena Collins	Entire Plan Change	Oppose	Delete the plan change.	Keep medium density to specific areas for example Rangitiki Street and Tremain Avenue where there are already 2-3 storey houses.	Reject
SO155.1	Rose Ogreaan			SO155.1	Rose Ogreaan	Zone Extent	Oppose	Exclude the Hokowhitu area	There is already on-street parking congestion. More housing will mean the school size will need to increase.	Reject
SO156.1	Andrew and Julie Phillips			SO156.1	Andrew and Julie Phillips	Entire Plan Change	Oppose	Reinstate the requirement for a resource consent for each home that is more than a single level dwelling.	Concerns about loss of privacy and loss of light (including impacting solar panels).	Reject
SO156.2	Andrew and Julie Phillips			SO156.2	Andrew and Julie Phillips	MRZ-R7	Oppose	There should be no more than 2 homes per 400m2 of land.	Concerns about increase in noise, pollution, traffic, stormwater and sewerage.	Reject
SO157.1	Pamela Bridewell			SO157.1	Pamela Bridewell	Entire Plan Change	Oppose	Delete the plan change.	Concerns about increased traffic impacting existing property access and increasing congestion.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO157.2	Pamela Bridewell			SO157.2	Pamela Bridewell	MRZ-S2	Oppose	Houses should be no more than single storey with a large distance to the boundary.	Concerns about loss of sunlight, privacy and enjoyment of outdoor living space.	Reject
SO158.1	Richard Wilde			SO158.1	Richard Wilde	MRZ-S2	Amend	When adjacent to existing homes, reduce the height from 9m to a more realistic heights on the margins of existing housing.	Concerns about shading, decreased property values, and increased density being out of place with existing houses.	Reject
SO159.1	John and Margaret Wood			SO159.1	John and Margaret Wood	MRZ-S1	Oppose	Restrict to two storeys in established suburbs	Loss of privacy, increased building height does not fit with existing houses in established suburbs. Too tall with 1m side and rear boundaries.	Reject
SO159.2	John and Margaret Wood			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.	Reject
SO159.2	John and Margaret Wood	FS06.27	Kāinga Ora	SO159.2	John and Margaret Wood	Standards	Oppose	Disallow	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.	Accept
SO159.3	John and Margaret Wood			SO159.3	John and Margaret Wood	Entire Plan Change	Amend	Not stated	Existing infrastructure is already overloaded in some suburbs and retrofitting is cost-prohibitive	Reject
SO159.4	John and Margaret Wood			SO159.4	John and Margaret Wood	Entire Plan Change	Amend	Require resource consents and neighbour consultation	To sure well designed housing which is in keeping with existing dwellings, and the same requirements for all.	Reject
SO160.1	Chris Charleston			SO160.1	Chris Charleston	MRZ-S1	Amend	Reduce the maximum permitted height	Three storey buildings will be prone to overheating on the top floor. Maintenance will be more difficult as will fire and paramedic access.	Reject
SO161.1	Lynnette Thurston-Paris			SO161.1	Lynnette Thurston-Paris	MRZ-S2	Amend	Reduce the maximum permitted height	Reducing in sunlight will impact ability to grow gardens/food. Reduction in airflow due to increased height and decreased separation may increase dampness.	Reject
SO162.1	Peter French			SO162.1	Peter French	Zone Extent	Oppose	Delete Tyne Street from the MRZ	Tyne Street is on the heritage trail and increased density would change the character of the street. Also concerned with increased traffic, stormwater, and impacts on children playing in the street.	Reject
SO163.1	Anthony Grace			SO163.1	Anthony Grace	Standards	Oppose	Reduce the number of units/1000m2 to no more than 2 and reduce the height to no more than 2 storeys, depending on how close to boundary fences.	Impacts on reasons why people find Palmerston North an attractive place to live and raise families.	Reject
SO164.1	David Lane			SO164.1	David Lane	MRZ-S10	Amend	Support the MRZ approach and consider there should be one set of rules across the city for stormwater attenuation devices	The existing rules for stormwater attenuation devices are unclear and confusing.	Accept in part
SO164.2	David Lane			SO164.2	David Lane	Zone Extent	Support	Retain the zone extent as notified. Consider including other areas, such as Fitzherbert Avenue.	Not stated	Accept in part
SO164.3	David Lane			SO164.3	David Lane	MRZ-S19	Oppose	Delete Clause 1	I have no problem with screening of rubbish storage areas on communal properties. I do not support screening for individual residential properties, this seems like over-reach by Council.	Accept in part
SO164.4	David Lane			SO164.4	David Lane	MRZ-S20	Amend	Amend clause 2(a) to clarify that height is measured from site ground level.	Many sites have a building platform level that is above the level of the footpath, the measure should be taken from the property's perspective, not the footpath perspective.	Accept
SO164.5	David Lane			SO164.5	David Lane	MRZ-S5	Oppose	Delete clause 3 and 4	I don't support mandating of trees on sites in this zone, this should be a matter of personal choice. e concerns about the 20% requirement for landscaping, 80 square metres on a 400 square metre site seems a lot.	Reject
SO165.1	Brendon Duncan			SO165.1	Brendon Duncan	MRZ-S1	Oppose	Return the heritage height control to a maximum of two storey.	Concern about loss of privacy, lack of accessibility, appearance, potential for overcrowding, lack of on site parking, lack of outdoor space, loss of character in heritage areas.	Reject
SO166.1	Palmerston North City Council			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 .	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.1	Palmerston North City Council	FS06.28	Kāinga Ora	SO166.1	Palmerston North City Council	MRZ-P3	Oppose	Disallow	In line with the Kāinga Ora submission, Kāinga Ora consider that MRZ-P3 is too detailed and reads as assessment criteria	Reject
SO166.2	Palmerston North City Council			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. recommends mitigation measures to remedy or mitigate the on- and off-site effects of the development*; and demonstrates that the on- and off-site adverse effects will be appropriately mitigated.	Clarity of drafting for plan implementation.	Accept
SO166.2	Palmerston North City Council	FS06.29	Kāinga Ora	SO166.2	Palmerston North City Council	MRZ-P7	Oppose	Disallow	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.	Reject
SO166.3	Palmerston North City Council			SO166.3	Palmerston North City Council	MRZ-R2	Amend	Amend MRZ-R2.1.c as follows c. No more than 1 /3 of the gross floor area of a residential building, including any accessory building or external storage area, (up to a maximum of 40m2 and including gross floor area and external storage areas but excluding any car parking areas) must can be used for the home business;	Clarity of drafting for plan implementation.	Accept
SO166.4	Palmerston North City Council			SO166.4	Palmerston North City Council	MRZ-R2	Amend	Amend MRZ-R2.2.1 as follows Council's discretion is restricted to: 1. The extent and effects of non-compliance with any standard in MRZ-R2.1 which has not been met, including any relevant assessment criteria for MRZ-R2.1 (k) (m); and ...	MRZ-R2.1(k-m) references existing rules within the Operative District Plan (ODP) which do not have assessment criteria associated with them.	Accept
SO166.5	Palmerston North City Council			SO166.5	Palmerston North City Council	MRZ-R3	Amend	Amend R3.2.1 Council's* discretion is restricted to: 1. The extent and effects of non-compliance with any standard in MRZ-R3.1 which has not been met, including any relevant assessment criteria for MRZ-R3.1 (c) and (d) ; and ...	MRZ-R3.1(c) and (d) references existing rules in the ODP which do not have assessment criteria associated with them.	Accept
SO166.6	Palmerston North City Council			SO166.6	Palmerston North City Council	MRZ-R4	Amend	Amend R4.2.1 Council's* discretion is restricted to: 1. The extent and effects of non-compliance with any standard in MRZ-R4.1 which has not been met, including any relevant assessment criteria for MRZ-R4.1 (b) (e) ; and	MRZ-R4.1(b) – (e) references existing rules in the ODP which do not have assessment criteria associated with them.	Accept
SO166.7	Palmerston North City Council			SO166.7	Palmerston North City Council	MRZ-R5	Amend	Amend R5.2.1 1. The extent and effects of non-compliance with any standard in MRZ-R5.1 which has not been met, including any relevant assessment criteria for MRZ-R5.1 (c) (b)-(f); and	MRZ-R5.1(c) references an existing rule in the ODP which does have assessment criteria associated with them.	Accept
SO166.8	Palmerston North City Council			SO166.8	Palmerston North City Council	MRZ-R6	Amend	Add an advice note that the rule does not apply to heritage buildings.	Provides clarification for plan user	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.9	Palmerston North City Council			SO166.9	Palmerston North City Council	MRZ-R7	Amend	Amend R7.2.2 The extent and effects of non-compliance with any standard in MRZ-R7.1(b) which has not been met, including any relevant matters of discretion or assessment criteria ; and	MRZ-R7.1(b) references existing rules in the ODP which do not have assessment criteria associated with them.	Accept
SO166.10	Palmerston North City Council			SO166.10	Palmerston North City Council	MRZ-R8	Amend	Amend MRZ-R8 as follows Council's* discretion is restricted to: <u>1.The extent and effects of non-compliance with standards MRZ-S1 – S20; and</u> <u>2.The relevant matters in MRZ-P2, MRZ-P3, MRZ-P4, MRZ-P6, MRZ-P8 and MRZ-P12.</u>	The addition is a relevant matter of discretion. Water sensitive design is a relevant matter of consideration when assessing the construction of four or more dwellings units.	Accept
SO166.11	Palmerston North City Council			SO166.11	Palmerston North City Council	MRZ-R9	Amend	Amend MRZ-R9.2.2 as follows The extent and effects of non-compliance with any standard in MRZ-R9.1(b) which has not been met, including the relevant matters of discretion or assessment criteria ; and	MRZ-R9.1(b) references existing rules in the ODP which do not have assessment criteria associated with them.	Accept
SO166.12	Palmerston North City Council			SO166.12	Palmerston North City Council	MRZ-R10	Amend	Delete reference to MRZ-P8	Policy MRZ-P8 is not relevant for this rule.	Accept
SO166.13	Palmerston North City Council			SO166.13	Palmerston North City Council	MRZ-R12	Amend	Amend MRZ-R12.2.2 as follows The extent and effects of non-compliance with any requirement in MRZ-R12.1(e)-(j) which has not been met, including any relevant assessment criteria for MRZ-R12.1(f)(e)-(i); and	MRZ-R12.1(f) references an existing rule in the ODP which does have assessment criteria associated with them.	Accept
SO166.14	Palmerston North City Council			SO166.14	Palmerston North City Council	MRZ-R13	Amend	Amend MRZ-R13.2.2 as follows 2. The extent and effects of non-compliance with any requirement in MRZ-R13.1(b)-(f) which has not been met, including any relevant matters of discretion assessment criteria for MRZ-R13.1(b)-(e) ; and ...	MRZ-R13.1(b)-(f) references existing rules in the ODP which do not have assessment criteria associated with them. Corrects typo in reference to MRZ-R12.	Accept
SO166.15	Palmerston North City Council			SO166.15	Palmerston North City Council	MRZ-R14	Amend	Replace reference to MRZ-R14.1(b)-(d) with (c)	MRZ-R14.1(c) references an existing rule in the ODP which do have assessment criteria associated with them.	Accept
SO166.16	Palmerston North City Council			SO166.16	Palmerston North City Council	MRZ-R15	Amend	Replace reference in R15.2.2 to MRZ-R14 with MRZ-R15(d)(c)-(g)	MRZ-R15.1(d) references existing rules in the ODP which do have assessment criteria associated with them. Corrects typo in reference to MRZ-R14.	Accept
SO166.17	Palmerston North City Council			SO166.17	Palmerston North City Council	MRZ-R18	Amend	Replace reference to MRZ-S6 with MRZ-S20	Corrects typo in reference to MRZ-S6.	Accept
SO166.18	Palmerston North City Council			SO166.18	Palmerston North City Council	MRZ-R20	Amend	Add in <u>The New Zealand Transport Agency Waka Kotahi (or its successor) must be given limited notification of an application under this rule unless they have provided written approval.</u>	NZTA are considered an affected party if the permitted standards of MRZ-R20 are not met. This is consistent with the approach taken in Rule 22.2 where KiwiRail Ltd must be given limited notification if the permitted activity standards of MRZ-R22 are not met.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.19	Palmerston North City Council			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 four or more carparks (including garages) <u>1. Activity status: Permitted</u> <u>Where:</u> <u>The cumulative area of any parking area, manoeuvring area and access ways on a site is less than 100m2.</u> <u>2. 1.Activity status: Restricted Discretionary</u> <u>Where:</u> <u>a.MRZ-R24.1(a) is not met</u> ... <u>Advice Note:</u> <u>The Council prefers the use of bioretention systems for stormwater treatment, for example raingardens, filter strips or swales. Further information is available in Council's Residential Bioretention Design Guide.</u>	Having an area as the trigger for compliance is better for administration of the rule.	Accept
SO166.19	Palmerston North City Council	FS01.3	Leith Consulting Limited	SO166.19	Palmerston North City Council	MRZ-R24	Support in part	Allow in part	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.	Accept
SO166.19	Palmerston North City Council	FS06.30	Kāinga Ora	SO166.19	Palmerston North City Council	MRZ-R24	Oppose in part	Disallow 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.	Reject
SO166.20	Palmerston North City Council			SO166.20	Palmerston North City Council	New rule	Amend	Insert MRZ-R25 as follows <u>MRZ-R25 Any activity or the construction, alteration or addition of buildings or structures not provided for in rules MRZ-R1-R24 is a discretionary activity.</u>	In the absence of a 'catch-all' rule, activities/buildings not captured by rules MRZ-R1 – MRZ-R24 would default to being a permitted activity, which would prevent consideration of effects and the application of conditions, if required.	Accept
SO166.20	Palmerston North City Council	FS01.4	Leith Consulting Limited	SO166.20	Palmerston North City Council	New rule	Support	Allow	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.	Accept
SO166.21	Palmerston North City Council			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. <u>2.Garages or accessory buildings may not exceed a maximum height of 2.8m above ground level.</u> MRZ-S1 does not apply to: •Fences and standalone walls (<u>refer MRZ-S20</u>);	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.	Accept
SO166.21	Palmerston North City Council	FS06.31	Kāinga Ora	SO166.21	Palmerston North City Council	MRZ-S1	Support	Allow	Kāinga Ora supports the deletion of a maximum height for accessory buildings allowing for uses above garages and more uniform built form.	Accept
SO166.22	Palmerston North City Council			SO166.22	Palmerston North City Council	MRZ-S2	Amend	Amend MRZ-S2 as follows 1.All buildings and structures (excluding garages and accessory buildings) must be contained beneath recession planes, inclined	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	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.22	Palmerston North City Council	FS06.32	Kāinga Ora	SO166.22	Palmerston North City Council	MRZ-S2	Oppose	Disallow	Kāinga Ora consider that a separate recession plane for accessory buildings is inappropriate given the effects would be the same if a dwelling	Reject
SO166.23	Palmerston North City Council			SO166.23	Palmerston North City Council	MRZ-S2	Amend	Replace Figure 2 with updated version	The height in relation to boundary recession plane continues to when a building exceeds the permitted activity height of 11m. The existing figure could be interpreted as suggesting that it doesn't.	Accept
SO166.24	Palmerston North City Council			SO166.24	Palmerston North City Council	MRZ-S3	Amend	Amend MRZ-S3.1 as follows 1. Any building (including a garage) must be set back from the relevant boundary by the minimum depth listed in the following Yards table. For a corner site* with frontages to two public roads, the front yard requirement applies to the primary frontage. Clarify the requirements for front yard minimum depths and add requirement for 1 metre rear yard	Clarity for plan users	Accept in part
SO166.25	Palmerston North City Council			SO166.25	Palmerston North City Council	MRZ-S3	Amend	Delete MRZ-S3.2	The application of MRZ-S3.1 to garages as proposed in the submission means that this table is no longer required.	Accept in part
SO166.26	Palmerston North City Council			SO166.26	Palmerston North City Council	MRZ-S3	Amend	Amend MRZ-S3 as follows MRZ-S3 does not apply to: • Accessory buildings up to a maximum of 2m in height, which are located in the side or rear yards. • Site boundaries where there is an existing or proposed common wall. • Fences or standalone walls. • Uncovered deck and uncovered structures no more than 1 metre in height above ground level. • Eaves up to 600 mm wide. For eaves wider than 600mm only the additional width beyond 600mm is included in the site coverage calculation.	An accessory building up to 2m in height will have insignificant effects on neighbouring properties given that a fence can be constructed up to 2m on a boundary without building or resource consent.	Accept in part
SO166.26	Palmerston North City Council	FS01.5	Leith Consulting Limited	SO166.26	Palmerston North City Council	MRZ-S3	Support	Allow	Support the intent of this submission and the requested change for the reasons given in the submission.	Reject
SO166.27	Palmerston North City Council			SO166.27	Palmerston North City Council	MRZ-S5	Amend	Amend MRZ-5.4 as follows 4. The specimen tree must be located in the outdoor living space required by MRZ-S7(2) where this is provided at the street frontage located in the front yard of a residential unit, papakāinga* or community house*	Clarifies the requirement for locating specimen trees when the outdoor living space is located in the front yard.	Accept
SO166.27	Palmerston North City Council	FS01.6	Leith Consulting Limited	SO166.27	Palmerston North City Council	MRZ-S5	Oppose	Disallow	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. There is no definition of front yard, so a new definition may be required.	Reject
SO166.28	Palmerston North City Council			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 lower heat map. Standard not considered necessary.	Accept
SO166.28	Palmerston North City Council	FS06.33	Kāinga Ora	SO166.28	Palmerston North City Council	MRZ-S6	Support	Allow	In line with the Kāinga Ora submission, Kāinga Ora strongly supports deletion of this rule.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.29	Palmerston North City Council			SO166.29	Palmerston North City Council	MRZ-S8	Amend	Correct figure references	Incorrect reference to S9 and Figure 4	Accept
SO166.30	Palmerston North City Council			SO166.30	Palmerston North City Council	MRZ-S11	Amend	Amend MRZ-S11 as follows 1. The <u>minimum floor level (finished floor) and ground level</u> for all <u>residential</u> buildings, <u>accessory buildings and structures</u> must be at least at the required freeboard for the 2% AEP flood extent for the site (including an allowance for climate change). ... Advice Note: The required <u>freeboard-minimum floor level</u> will be provided by Palmerston North City Council.	Reference to ground level and accessory buildings and structures is incorrect. Clarity of drafting, to assist with plan implementation.	Accept
SO166.31	Palmerston North City Council			SO166.31	Palmerston North City Council	MRZ-S12	Amend	Amend table wording, including introducing requirement for corner sites or a site with two frontages.	Clarity of drafting, to assist with plan implementation. Incorrect references to Figures 3 and 2	Accept
SO166.32	Palmerston North City Council			SO166.32	Palmerston North City Council	MRZ-S13	Amend	Add new figure showing front door location	Clarity of drafting, to assist with plan implementation.	Reject
SO166.33	Palmerston North City Council			SO166.33	Palmerston North City Council	MRZ-S16	Amend	Add <u>2. The location of any associated new or altered vehicle crossing must not require:</u> <u>i. the removal of any tree planted on any public road, or</u> <u>ii. modification, excavation or construction within the area directly beneath the dripline* of the tree.</u> <u>Matters of discretion where the standard is infringed:</u> <u>1. Health and maturity of the tree;</u> <u>2. Provision of a replacement tree; and</u> <u>3. Feasibility of alternative access* arrangements.</u>	Consistent with the requirements of SUB-MRZ-S4, which protects existing street trees. It is appropriate to include this as a standard when crossings are proposed as part of a development that does not involve subdivision.	Accept
SO166.34	Palmerston North City Council			SO166.34	Palmerston North City Council	MRZ-S17	Amend	Amend MRZ-S17 as follows On-site vehicle manoeuvring must comply with MRZ-Figure <u>6 8</u> where there is a side-entry garage or parking space. Add the following note under MRZ Figure 8 <u>Advice Note: This diagram accommodates an 85th percentile single movement swept path as per AS/NZS 2890.1 The Australian/New Zealand Standard Parking Facilities – Part 1- Off-street Car Parking.</u>	Correction to figure number. Provides clarification that the diagram is based on a swept path standard.	Accept
SO166.34	Palmerston North City Council	FS01.7	Leith Consulting Limited	SO166.34	Palmerston North City Council	MRZ-S17	Support	Allow	Support the intent of this submission and the requested change for the reasons given in the submission.	Accept
SO166.35	Palmerston North City Council			SO166.35	Palmerston North City Council	MRZ-S18	Amend	Amend MRZ-S18.1 as follows 1. Bicycle parking must be provided for all residential units at a <u>minimum</u> rate of 1 bicycle park per residential unit;	Allows for more than 1 bike park to be provided.	Accept
SO166.36	Palmerston North City Council			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.	Reject
SO166.36	Palmerston North City Council	FS01.8	Leith Consulting Limited	SO166.36	Palmerston North City Council	MRZ-S19	Support in part	Allow in part	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.	Accept in part
SO166.36	Palmerston North City Council	FS06.34	Kāinga Ora	SO166.36	Palmerston North City Council	MRZ-S19	Oppose	Disallow	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	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.37	Palmerston North City Council			SO166.37	Palmerston North City Council	MRZ-S20	Amend	<p>Amend MRZ-20.2 as follows</p> <p>...</p> <p>2. On a front boundary with a public road any fence or standalone wall, or combination of these structures, the following applies must not:</p> <p>a. A maximum height of 1.1 metres applies except that solid fencing may be erected to 1.8 metres over not more than 1/3 of the frontage width, and</p> <p>b. No part of a solid fence above 1.1 metres in height shall be located within 1.8 metres of a driveway, except for gate posts relating to a fence of open construction;</p> <p>c. If the fence is of open construction, the fence must not exceed 1.8 metres in height.</p> <p>d. Exceed a maximum height of 1.8 metres above ground level; and</p> <p>e. For any part of a fence or standalone wall above 1.1 metres in height, at least 2/3 of the fence must be of open construction.</p> <p>Except that:</p> <ul style="list-style-type: none"> • Where a fence is erected on the road frontage of a corner site*, the requirements of MRZ-S1620.2 only apply to one road frontage. 	<p>The proposed amendment is consistent with Rule 10.6.1.4(d) of the ODP.</p> <p>The reference to MRZ-S16 is a typo.</p>	Accept in part
SO166.38	Palmerston North City Council			SO166.38	Palmerston North City Council	Section 7B	Amend	Change "lot/s" to "allotment/s"	"Allotment/s" is defined in the National Planning Standards, which the Council is required to implement.	Accept
SO166.39	Palmerston North City Council			SO166.39	Palmerston North City Council	SUB-MRZ-P3	Amend	<p>SUB-MRZ-P3 Subdivision of land affected by natural hazards</p> <p>Take a risk-based approach to the <i>subdivision of land affected by natural hazards</i> so that new or exacerbation of existing natural hazards and/or exacerbation of existing natural hazards is avoided and appropriate mitigation measures are in place prior to <i>development</i> .</p>	Reworded to provide clarity for plan implementation.	Accept in part
SO166.40	Palmerston North City Council			SO166.40	Palmerston North City Council	SUB-MRZ-R1	Amend	Remove bylaw year	In rules SUB-MRZ-R1, R1A and R2 references in advice notes are made to specific versions of Bylaws. Removing the Year of the Bylaw avoids tying the plan to specific versions which may be replaced in the future	Accept
SO166.41	Palmerston North City Council			SO166.41	Palmerston North City Council	SUB-MRZ-R1	Amend	Remove bylaw year	In rules SUB-MRZ-R1, R1A and R2 references in advice notes are made to specific versions of Bylaws. Removing the Year of the Bylaw avoids tying the plan to specific versions which may be replaced in the future	Accept
SO166.42	Palmerston North City Council			SO166.42	Palmerston North City Council	SUB-MRZ-R2	Amend	Remove bylaw year	In rules SUB-MRZ-R1, R1A and R2 references in advice notes are made to specific versions of Bylaws. Removing the Year of the Bylaw avoids tying the plan to specific versions which may be replaced in the future	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.43	Palmerston North City Council			SO166.43	Palmerston North City Council	SUB-MRZ-P4	Amend	MRZ-SUB-P3 (typo should be 4) – Subdivision in the Stormwater Overlay Avoid subdivision 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. recommend see mitigation measures to remedy or mitigate the on- and off-site effects of the development*; and 5. demonstrates that the on- and off-site adverse effects will be appropriately mitigated.	Clarity of drafting for plan implementation.	Accept
SO166.44	Palmerston North City Council			SO166.44	Palmerston North City Council	SUB-MRZ-R1	Amend	Amend SUB-MRZ-R1.1 as follows 1. Activity status: Controlled Where: a. Where the site is not located within the Stormwater Overlay; and a. Compliance with the following standards is achieved: i. Standards MRZ-S1 – MRZ-S20, for allotments lots created with an existing dwelling*; ii. SUB-MRZ-S1 – Access*; iii. SUB-MRZ-S2 – Vehicle crossings; iv. SUB-MRZ-S3 – Essential services*; v. SUB-MRZ-S4 – Street trees; b. Accesses* comply with R20.4.2 i. 20.4.2(a)(i)-(v); ii. 20.4.2(a)(vi)(b-j); iii. 20.4.2(a)(vii)-(viii); and c. Earthworks comply with R6.3.6.1(b). d. MRZ-R24 - Stormwater treatment for parking and manoeuvring areas, and access ways	Clarity of drafting for plan implementation as SUB-MRZ-R1A is proposed. Inclusion of MRZ-R24 is required for any subdivision that proposes to create parking and manoeuvring areas and accessways.	Accept in part
SO166.45	Palmerston North City Council			SO166.45	Palmerston North City Council	SUB-MRZ-R1	Amend	Delete SUB-MRZ-R1.2	Deleted as SUB-MRZ-R1A is proposed which will provide clarity when applying for and processing applications within the Stormwater Overlay.	Accept
SO166.46	Palmerston North City Council			SO166.46	Palmerston North City Council	SUB-MRZ-R1	Amend	Amend SUB-MRZ-R1.3 as follows 23. Activity status: Restricted Discretionary Where: a. Compliance with one or more of the standards in SUB-MRZ-R1.1(ab)-(cd) is not achieved. Council's* discretion is restricted to: 1. The matter(s) of discretion for any infringed standard in MRZ-S1-MRZ-S20; 2. The matter(s) control for any infringed standard in SUB-MRZ-R1.1(ab)(ii-iii)-(v) and (b)-(cd);	Not stated	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.47	Palmerston North City Council			SO166.47		New rule	Amend	<p>Insert the following new rule</p> <p><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></p> <p><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></p> <p><u>Notification:</u> <u>An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.</u></p>	Provides clarity when processing and applying for applications within the Stormwater Overlay	Accept in part
SO166.47	Palmerston North City Council	FS01.9	Leith Consulting Limited	SO166.47	Palmerston North City Council	New rule	Support	Allow	Support the intent of this submission and the requested change for the reasons given in the submission.	Accept
SO166.47	Palmerston North City Council	FS06.35	Kāinga Ora	SO166.47	Palmerston North City Council	New rule	Oppose in part	Disallow 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.	Reject
SO166.48	Palmerston North City Council			SO166.48	Palmerston North City Council	SUB-MRZ-R2	Amend	<p>Amend SUB-MRZ-R2.1 as follows</p> <p>...</p> <p>c. Accesses* comply with R20.4.2 i.20.4.2(a)(i)-(v); ii.20.4.2(a)(vi)(b-j); iii.20.4.2(a) (vii)-(viii); and d. Earthworks comply with R6.3.6.1(b). <u>: and</u> <u>e. It can be demonstrated that any vacant allotment can comply with MRZ-S1-S5, MRZ-S7-S9 and MRZ-S16-S17.</u> ---</p> <p><u>5. Whether a residential unit can be contained within the allotment which complies with MRZ-S1 – S5, MRZ-S7 - S9, MRZ-S16 – S17. The relevant matters in SUB-MRZ-P2.</u></p>	(e) is required to trigger the new matter of discretion.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO166.49	Palmerston North City Council			SO166.49	Palmerston North City Council	SUB-MRZ-R3	Amend	Amend SUB-MRZ-R3(1)(a) There are no new undeveloped separately disposable <u>allotments let</u> , cross leases, company areas or any units created; and	Grammar	Accept
SO166.50	Palmerston North City Council			SO166.50	Palmerston North City Council	SUB-MRZ-S1	Amend	1.Each allotment must have practical, physical and legal access* to a public road. <u>by way of either</u> 2. <u>Access* to a rear allotment must be</u> by way of either: a. an access leg* at least 3 metres wide forming part of the <u>allotment let</u> ; or b. a shared access* consisting of up to six access strips* lying adjacent to one another and giving access* to no more than five other <u>allotments lets</u> , and in respect of which reciprocal rights-of-way are granted or reserved; or c. an access strip* held in common ownership with the allotment and up to five other allotments; or d. any right-of-way running with and appurtenant to the land in which the allotment is comprised.	Clarity of drafting for plan implementation. The amendment clarifies the requirements for rear allotments and front allotments.	Accept
SO166.51	Palmerston North City Council			SO166.51	Palmerston North City Council	Definition - Rail Corridor	Amend	Replace DP with District Plan	Removed abbreviation.	Accept
SO167.1	Christine Matthews			SO167.1	Christine Matthews	Entire Plan Change	Oppose	That the Council upholds the proposed requirements in the plan change.	Concerned that if the plan provisions are not upheld there will be issues with stormwater, lack of integration with public transport, increased on street car parking and shading from taller buildings.	Accept in part
SO168.1	Ivan Johnstone			SO168.1	Ivan Johnstone	Entire Plan Change	Oppose	Delete the plan change.	Intensification is not for Palmerston North - concerns about height and lack of onsite parking.	Reject
SO169.1	Jennifer Orange			SO169.1	Jennifer Orange	Zone Extent	Amend	Extend zone boundary to include 68 Fitzroy Street, Terrace End.	This is an island in the current zone extent. It would be illogical, impracticable and limiting if this site was not included.	Reject
SO170.1	Leith Consulting			SO170.1	Leith Consulting	MRZ-S1	Amend	amend the second part of the standard (assume an error as it states 1. as well as follows (delete in its entirety). <u>2. Garages or accessory buildings may not exceed a maximum height of 2.8m above ground level.</u> We also support any consequential changes to the plan as a result of our relief sought.	There are situations where a granny flat or studio may be located above e.g a garage(attached or detached) which would be caught by this rule and should be subject to MRZ-S1.1 height. We should be trying to encourage granny flats i.e minor residential units. If it is not the intention that this be captured by MRZ S1.2 then the standard should be updated to make this clearer as I understand the intention may be to manage the impact of taller utilitarian type buildings on the residential character and amenity values. MRZ-S1.1 should be sufficient for mitigating any dominance effects as it applies to the entire dwelling which would be used as the permitted baseline for effects purposes.	Accept
SO170.2	Leith Consulting			SO170.2	Leith Consulting	MRZ-S2	Support	Retain as notified	This standard is supported by the Urban Design Report by McIndoe Urban which provides a more nuanced approach to the MDRS standards for Palmerston North.	Accept in part
SO170.3	Leith Consulting			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 <u>and Rear</u> 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?	Accept
SO170.3	Leith Consulting	FS06.36	Kāinga Ora	SO170.3	Leith Consulting	MRZ-S3	Support	Allow	Kāinga Ora support the amendment for plan clarity	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO170.4	Leith Consulting			SO170.4	Leith Consulting	MRZ-S4	Support	Retain as notified	It is generally in line with the MDRS standards and will allow greater building coverage for greater housing density needs in Palmerston North whilst still mitigating amenity effects and effects relating to stormwater.	Accept in part
SO170.5	Leith Consulting			SO170.5	Leith Consulting	MRZ-S5	Amend	Retain the proposed wording of this standard except for the changes requested below: 3. At least one specimen tree capable of growing to a minimum height of four metres after five ten years must be provided for each ground floor residential unit, papakāinga* or community house*. In addition, the Council should consider providing more guidance to applicants about suitable specimen trees in a non-regulatory urban design and landscape design guideline. We also support any consequential changes to the plan as a result of our relief sought	The standard does need to be amended to be in line with the advice given in the Landscape Report as the five years for the specimen tree growth is not supported in the Landscape Report which recommends 10 years.	Accept
SO170.6	Leith Consulting			SO170.6	Leith Consulting	MRZ-S6	Oppose	Delete standard	This standard would be difficult to enforce, show compliance with (i.e. costs associated with modelling shading for building consent/resource consent purposes) and will add additional expense for housing.	Accept
SO170.7	Leith Consulting			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 30m ² which can accommodate a 4.5 metre diameter circle for a residential unit or community house* with two three or more bedrooms; or b. a minimum area of 20m ² which can accommodate a 4 metre diameter circle for a residential unit or community house* with one bedroom up to two bedrooms ; and	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.	Accept
SO170.7	Leith Consulting	FS06.37	Kāinga Ora	SO170.7	Leith Consulting	MRZ-S7	Support	Allow	Kāinga Ora supports the proposed amendments	Accept
SO170.8	Leith Consulting			SO170.8	Leith Consulting	MRZ-S8	Amend	Amend as follows: An outlook space must be provided for every residential units, papakāinga* or community house* which meets the following minimum dimensions (measured from the centre point of the applicable window): a. 6.5 metres in depth x 4 metres in width outlook space for a main living area; and b. 3 metres in depth x 3 metres in width outlook space for the primary bedroom ; and c. 1 metre in depth x 1 metre in width outlook space for all other habitable rooms. We also support any consequential changes to the plan as a result of our relief sought	The suggested amendments better align with the MDRS standards. Furthermore, there may be no primary bedroom in a house layout and bedrooms do not generally require the same amount of light and privacy as living spaces as occupants do not spend the same amount occupying these spaces for entertainment/leisure purposes. In addition, bedrooms can benefit from less sunlight and more shade given their primary purpose is for sleeping whereby issues of overheating can be an issue	Reject
SO170.9	Leith Consulting			SO170.9	Leith Consulting	MRZ-S9	Support	Retain as notified	30% permeable surface is a threshold that has been adopted by a number of other Councils.	Accept in part
SO170.10	Leith Consulting			SO170.10	Leith Consulting	MRZ-S10	Support	Retain as notified	Clear and easy to understand and calculate. Will require a soakpit design report to demonstrate compliance if this is the attenuation method proposed as depends on soakage rate of soils. This information would need to be provided up-front. This could be added as a note.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO170.11	Leith Consulting			SO170.11	Leith Consulting	MRZ-S11	Oppose	Delete standard	Stormwater Servicing Assessment report only seem to rely on PNCCs current level of service for FFL as per their PNCC ESLD. The Tonkin and Taylor supporting stormwater report states that This assessment does not specifically consider whether the flood depths within the proposed intensification areas are acceptable or require any mitigation measures or infilling to raise floor levels above the floodplain, in order to be developed."	Reject
SO170.12	Leith Consulting			SO170.12	Leith Consulting	MRZ-S12	Support	Retain as notified	The rule provides a more nuanced approach to the MDRS standard which anecdotaly is not flexible enough for different scenarios creating the need for unnecessary resource consents.	Accept in part
SO170.13	Leith Consulting			SO170.13	Leith Consulting	MRZ-S13	Support	Retain as notified	Contributes to good urban design outcomes.	Accept
SO170.14	Leith Consulting			SO170.14	Leith Consulting	MRZ-S14	Oppose	Delete standard	Some houses are designed so that the garage door occupies the bottom of the building with the living accommodation mostly upstairs. This can also help with managing flood risk for the habitable rooms in the house. When the garage door is integrated into the house design, despite taking up the bottom half of the house façade, it can look aesthetically pleasing.	Reject
SO170.15	Leith Consulting			SO170.15	Leith Consulting	MRZ-S15	Amend	Amend as follows: 1. Any on-site carparking within 6 metres of a boundary adjoining a public road: a. must not comprise more than 50% of the width of the residential unit's facade to which it relates	Point a of the standard does not appear to relate to other of the matters of discretion and appears to be an amenity matter. This point a. also seems to discourage parking perpendicular to the road frontage which has benefits such as on-site maneuvering so you can exit the site in a forwards manner	Reject
SO170.16	Leith Consulting			SO170.16	Leith Consulting	MRZ-S16	Support	Retain as notified	Supports safety for pedestrians, reduces the number of vehicle crossings which also remove on-street car parking spaces.	Accept in part
SO170.17	Leith Consulting			SO170.17	Leith Consulting	MRZ-S17	Support	Retain as notified	With more residential units sharing an access, internal circulation becomes more important for safety reasons.	Accept in part
SO170.18	Leith Consulting			SO170.18	Leith Consulting	MRZ-S18	Support	Retain as notified	I support the intent of this rule. You will have people just showing that they could wheel their bike into their living room though and lean it up against the wall.	Accept in part
SO170.19	Leith Consulting			SO170.19	Leith Consulting	MRZ-S19	Amend	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 and is screened if visible from a public place, shared accessway or communal area.	For rear properties which do not front the street or a shared accessway, it would be unnecessary to have to screen the bin storage area as it would not be visible from a public or shared/communal area.	Accept in part
SO170.20	Leith Consulting			SO170.20	Leith Consulting	MRZ-S20	Amend	2. On a front boundary with a public road any fence or standalone wall, or combination of these structures, must not: a. Exceed a maximum height of 1.8 metres above ground level; and b. For any part of a fence or standalone wall above 1.1 metres in height, at least 2/3 of the fence must be of open construction.	You could re-word this to include a certain amount of the fence has to be 'permeable' but as worded I don't think this would work for people who have dogs in their front yard and need to contain the dogs from escaping.	Accept
SO170.21	Leith Consulting			SO170.21	Leith Consulting	MRZ-S21	Support	Retain as notified	Helps to provide a pleasant living environment without needing to open windows and doors for ventilation when outdoor noise levels are high.	Accept in part
SO170.22	Leith Consulting			SO170.22	Leith Consulting	MRZ-R1	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept
SO170.23	Leith Consulting			SO170.23	Leith Consulting	MRZ-R2	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part
SO170.24	Leith Consulting			SO170.24	Leith Consulting	MRZ-R3	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part
SO170.25	Leith Consulting			SO170.25	Leith Consulting	MRZ-R4	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part
SO170.26	Leith Consulting			SO170.26	Leith Consulting	MRZ-R5	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO170.27	Leith Consulting			SO170.27	Leith Consulting	MRZ-R6	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part
SO170.28	Leith Consulting			SO170.28	Leith Consulting	MRZ-R7	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part
SO170.29	Leith Consulting			SO170.29	Leith Consulting	MRZ-R8	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part
SO170.30	Leith Consulting			SO170.30	Leith Consulting	MRZ-R9	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity	Accept in part
SO170.31	Leith Consulting			SO170.31	Leith Consulting	MRZ-R10	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.32	Leith Consulting			SO170.32	Leith Consulting	MRZ-R11	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.33	Leith Consulting			SO170.33	Leith Consulting	MRZ-R12	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.34	Leith Consulting			SO170.34	Leith Consulting	MRZ-R13	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.35	Leith Consulting			SO170.35	Leith Consulting	MRZ-R14	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.36	Leith Consulting			SO170.36	Leith Consulting	MRZ-R15	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.37	Leith Consulting			SO170.37	Leith Consulting	MRZ-R16	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.38	Leith Consulting			SO170.38	Leith Consulting	MRZ-R17	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.39	Leith Consulting			SO170.39	Leith Consulting	MRZ-R18	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.40	Leith Consulting			SO170.40	Leith Consulting	MRZ-R19	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept
SO170.41	Leith Consulting			SO170.41	Leith Consulting	MRZ-R20	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.42	Leith Consulting			SO170.42	Leith Consulting	MRZ-R21	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept
SO170.43	Leith Consulting			SO170.43	Leith Consulting	MRZ-R22	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept
SO170.44	Leith Consulting			SO170.44	Leith Consulting	MRZ-R23	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept
SO170.45	Leith Consulting			SO170.45	Leith Consulting	MRZ-R24	Support	Retain as notified	Clear wording and intent and manages adverse effects on residential amenity and stormwater effects.	Accept in part
SO170.46	Leith Consulting			SO170.46	Leith Consulting	MRZ-R24	Amend	MRZ-R24 Stormwater treatment for Provision of four or more carparks (including garages) per site	Could this not be addressed by a well worded permitted activity rule or standard so that people who are providing four on site car parks for residential living do not require a resource consent?	Reject
SO170.47	Leith Consulting			SO170.47	Leith Consulting	MRZ - Activity Status	Support	Retain RDA activity status for rules	I support the use of the restricted discretionary activity status for the new MDRS chapter standards as it provides applicants and plan users with clarity and scope when applying for resource consents. The use of notes in the plan also adds to clarify and interpretation as well as notification clauses.	Accept
SO171.1	Anne Allan			SO171.1	Anne Allan	Zone Extent	Oppose	The MRZ should be restricted to the inner-city area only.	This would allow the council to assess demand and affordability of such housing without changing the character of the rest of the city by doing high density housing throughout a large part of the city. This area should be bounded approximately by College St, Victoria Ave, Featherston St and Cook street. Some of the housing within this rough boundary is quite rundown and untidy and this would provide the opportunity to upgrade these areas. This approximate area fulfils all your zoning criteria schools, shops, transport, green space. The effects on neighbours of increased density are not acceptable.	Reject
SO171.2	Anne Allan			SO171.2	Anne Allan	Standards	Amend	Include a minimum site size	The number of buildings per site is meaningless without a site size.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO171.2	Anne Allan	FS06.38	Kāinga Ora	SO171.2	Anne Allan	Standards	Oppose	Disallow	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.	Accept
SO172.1	Warren Walton			SO172.1	Warren Walton	Zone Extent	Oppose	Exclude Royal Oak Drive and Rosebank Avenue from the zone extent.	To be consistent with exclusion of Rodeo Drive.	Reject
SO173.1	Vanesa Gonzalez Freijo			SO173.1	Vanesa Gonzalez Freijo	Entire Plan Change	Oppose	Delete the plan change.	I don't think that our city's infrastructure ready to these changes. Is not just water... it's parking, health, schools (all levels), safety, roads, etc. These changes to the density and building heights will impact on neighboring properties privacy, lifestyle and value.	Reject
SO174.1	Connie and Kerry Zuppich			SO174.1	Connie and Kerry Zuppich	Entire Plan Change	Support	Not stated	The neighbours must still be taken into account. Their right to privacy, sunlight, green space must still be taken into account	Accept
SO175.1	Deana Garstang			SO175.1	Deana Garstang	Standards	Oppose	Increase the distance between houses, lower the height control and change the borderlines.	Concerns about houses being too close together, loss of privacy, increased noise, loss of sun, impact on property values.	Reject
SO176.1	Kim Mclean			SO176.1	Kim Mclean	MRZ-S2	Oppose	Keep existing requirement	These new proposed boundry height allowances are too high, blocks out natural sunlight, and invades neighbouring properites privacy	Reject
SO177.1	Michelle Herbert			SO177.1	Michelle Herbert	MRZ-S2	Oppose	Keep existing requirement	These new proposed boundry height allowances are too high, blocks out natural sunlight, and invades neighbouring properites privacy	Reject
SO178.1	Annette Nixon			SO178.1	Annette Nixon	SUB-MRZ-P1	Support	Retain as notified, noting: 1. Does optimise solar gain include encouragement to invest in solar power? 2. Achieving high quality landscape outcomes should also include engaging shading to mitigate heat effects 3. Public gathering spaces should be with residential development and within the neighbourhood.	Not stated.	Accept
SO178.2	Annette Nixon			SO178.2	Annette Nixon	SUB-MRZ-P2	Support	Retain as notified	In Palmerston North the developments at North St and with Soho using multiple sites, park / reserve / street or commercial boundaries, especially those commercial areas presenting a plain or spacious façade, have the best appearance and blend with their neighbourhoods in terms of height, space for landscaping and outdoor residential activity.	Accept
SO178.3	Annette Nixon			SO178.3	Annette Nixon	Reserves rezoning	Support	Support Summerhays and PNCC Depot site. For Huia Street Please ensure the setback from the Fitzherbert Ave / Park Road corner allows excellent visibility for traffic flow, including pedestrian traffic. This area adjoining the tennis courts and school can be an invitation gateway to the parks. Please develop this access, encouraging recreational activity and links between the existing residential neighbourhood, the new development and the public areas away from the road.	Not stated.	Accept
SO178.4	Annette Nixon			SO178.4	Annette Nixon	MRZ-S10	Support	Apart from an attenuation device on site, are their likely to be other S/W controls such as swales (creating a biodiversity area) or rainwater collection for other use?	Not stated.	Accept
SO178.5	Annette Nixon			SO178.5	Annette Nixon	SUB-MRZ-S4	Support	Retain as notified	Essential to maintain or add this amenity and environmental addition for shading and city "greening" along with berm gardens, residential and public food production areas.	Accept in part
SO179.1	Rosemary Watson			SO179.1	Rosemary Watson	Zone Extent	Amend	Consider whether specific areas should be omitted or phased for intensification: - stormwater overlay - areas with narrow streets - special interest/heritage areas	To achieve better outcomes for all	Reject
SO179.2	Rosemary Watson			SO179.2	Rosemary Watson	Entire Plan Change	Amend	Reconsider what "the need to maintain residential amenity and character" means.	New development should fit with the overall look of the city and be consistent with surrounding buildings.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO179.3	Rosemary Watson			SO179.3	Rosemary Watson	Standards	Amend	Reconsider effects on nearby/next-door neighbours specific to proposed development site and individual building designs.	As well as basic aesthetics, amenity value for existing residents needs to be considered on an individual basis. Also need to consider accessibility, potential for overcrowding, limited outdoor space and potential for overheating.	Reject
SO179.4	Rosemary Watson			SO179.4	Rosemary Watson	Standards	Amend	Reconsider importance of greenspace and access to greenspace.	Private and public greenspace is important. Concern that minimum landscaping and permeable surface requirements are insufficient to plant trees etc to ensure sufficient cooling.	Reject
SO180.1	Richard Houlahan			SO180.1	Richard Houlahan	MRZ-S1	Amend	Increase the height of accessory buildings from 2.8m to 3.8m	As an LBP Design 2 Architectural Designer of 22 years my advice is it's impossible to achieve the 2.8m maximum height. Even for a flat membrane roof which still requires 2° roof pitch and roof framing in the form of rafters that could be between 190-290mm thick depending on span. In this case the height calc would be 225+2455+290+200 (roof rise) = 3170mm, An even higher figure than the trussed 3° pitch option.	Accept in part
SO181.1	Steve Allan			SO181.1	Steve Allan	Entire Plan Change	Amend	Amend to align with the actual intention of the RMA. Implement an opportunity for city resident to vote as to whether the implementation of the RMA should be supported in Palmerston North.	Many of the factors identified as reason / justification for increased future population are actually in decline.	Reject
SO181.2	Steve Allan			SO181.2	Steve Allan	Entire Plan Change	Amend	Help remove development and subdivision cost barriers to traditional infill 2 story maximum housing.	Cost is major impediment for traditional subdivision where aging residents wish to remain in their dwelling but cannot afford to retain or do not require extensive amounts of land. Lower cost would conceivably make more sub dividable property available for development.	Accept in part
SO181.3	Steve Allan			SO181.3	Steve Allan	MRZ-R7	Oppose	Amend to a 2 dwelling maximum per property for intensification	Living in a suburban street with infill housing, and in observing others, it is my experience that Palmerston North suburbs have coped with infill housing without significant social upheaval, overloading of council provided infrastructure and services. It is reasonable to expect housing intensification impact will be significantly more and that non council provided services such as electricity will become an issue. The arrival of E vehicles has already challenged the suburban power distribution networks.	Reject
SO182.1	Vicki Worker			SO182.1	Vicki Worker	Standards	Amend	Require that off-street parking is supplied.	To ensure streets arent clogged up with residents cars and also to provide residents with a place where they could potentially "charge" EV's	Reject
SO182.2	Vicki Worker			SO182.2	Vicki Worker	Standards	Amend	More direction required about building materials/maintenance on 3 storey developments	Concerned that in 20-30 years some of these 3 storey apartments will look like ghettos and like some of the old state housing apartment blocks if difficult and expensive to maintain, Unlikely high windows would be washed often (if at all) and 3 storey is very expensive to paint so are blocks/brick a better material and less likely to require major maintenance.	Reject
SO183.1	Shivarn Stewart			SO183.1	Shivarn Stewart	Zone Extent	Amend	Recommend that all properties on Wharenui Terrace and nearby properties on Rangiora Ave are required to have a case-by-case stormwater review before further housing can be approved to be built, similar to some other areas listed in the city.	Many properties on this street don't have their own stormwater and sewer access, instead, this goes through neighbouring properties. This poses a risk if housing in our area was significantly increased, given that more and more houses would be running through the same shared water systems. Further, the street drainage point in this street get blocked multiple times a year due to (public) trees' leaves and in heavy rain often floods the culdesac entranceway and makes it difficult for pedestrians and cars. As far as we're aware there's no plans to improve or better maintain this drainage, which would add to issues in storming situations.	Reject
SO184.1	Chris Teo-Sherrell			SO184.1	Chris Teo-Sherrell	MRZ-O1	Support	Retain MRZ-O1(a) as notified	There is too little choice in the type and size of housing currently being provided. Many of the dwellings in the city are too big for the small households that are now the norm. Also, need to provide an alternative to the sprawl that is currently occurring.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO184.2	Chris Teo-Sherrell			SO184.2	Chris Teo-Sherrell	MRZ-O1	Amend	Delete 'and do not compromise the existing hierarchy of business zones within the city' from MRZ-O1(b)	The existing hierarchy of business zones is a highly car centric one. The nature of work and commerce has changed dramatically in recent years. There is now both the ability for many occupations to be undertaken from anywhere and the desire of many people to work from home. Having quiet and clean retail, service and hospitality activities in the MRZ will result in more destinations being within walking distance of people's homes contributing to both local community connectedness and the ability of resident to live car-light lives.	Reject
SO184.3	Chris Teo-Sherrell			SO184.3	Chris Teo-Sherrell	MRZ-O2	Support	Retain MRZ-O2(a-c) and (f-j) as notified	All these points will help to make the MRZ successful but they will also need to be accompanied by behavioural rules and enforcement especially concerning noise and vehicle use. These two factors are the major causes of conflict within medium density zones in other cities.	Accept
SO184.4	Chris Teo-Sherrell			SO184.4	Chris Teo-Sherrell	MRZ-O2	Amend	Replace 'adaptable' with another word in MRZ-O2 (d).	While 'healthy' is readily understood to mean something like 'conducive to the good health of residents', the meaning of 'adaptable' in this context is not clear.	Accept
SO184.5	Chris Teo-Sherrell			SO184.5	Chris Teo-Sherrell	MRZ-O2	Amend	Replace 'reasonable' with another word in MRZ-O2(e)	'Reasonable' is a highly subjective word, meaning different things to different people.	Reject
SO184.6	Chris Teo-Sherrell			SO184.6	Chris Teo-Sherrell	MRZ-O3	Amend	Replace 'Manawatū Awa' with 'Manawatu River (Manawatū Awa)'	Given this is a document overwhelmingly written in English, text should be in English with any Maori language being used parenthetically and defined in Chapter 4 where it isn't a direct translation of the preceding English word.	Reject
SO184.7	Chris Teo-Sherrell			SO184.7	Chris Teo-Sherrell	MRZ-O4	Amend	Delete 'residential'. Replace 'the on-site and off-site effects of flooding (including from stormwater) on people, property and the environment as a result of residential intensification are appropriately mitigated.' with 'there is no net increase in stormwater yield or rate from a site compared with prior to intensification'.	Development enabling non residential activities is also permitted (Ref. No. 11 MRZ P1.2) so intensification of that should also be referred to in this provision. Deleting 'residential' achieves this as the sentence then covers both residential and non residential intensification. 'Appropriately' mitigated is too vague and 'mitigated' only means lessened. sites is measured or modelled.	Accept in part
SO184.8	Chris Teo-Sherrell			SO184.8	Chris Teo-Sherrell	MRZ-O5	Amend	Insert the types of infrastructure that is intended to be covered by this unless all public infrastructure is being referred to. If the latter is the case, insert 'any public' before 'infrastructure'.	Infrastructure isn't defined in Chapter 4. Roading and railways and airports, water and gas pipes, communications and energy cables are all infrastructure. Are all of these things meant by the use of this term here?	Accept in part
SO184.9	Chris Teo-Sherrell			SO184.9	Chris Teo-Sherrell	MRZ-O6	Amend	Replace 'Whenua Maori' – 'Tangata whenua' and 'whenua' with the appropriate English words and include the Maori words parenthetically.	Given this is a document overwhelmingly written in English, text should be in English with any Maori language being used parenthetically and defined in Chapter 4 where it isn't a direct translation of the preceding English word. Assuming 'whenua' is referring to 'land' in this instance, is 'whenua Maori' land that is Maori freehold land, Maori customary land or general land owned by one Maori person or a group of Maori people? (Office of the Maori Trustee)	Reject
SO184.10	Chris Teo-Sherrell			SO184.10	Chris Teo-Sherrell	MRZ-O6	Amend	I request that it be made clear how any differences between Maori cultural values and aspirations and the rest of the objectives, policies and rules of this Plan Change will be reconciled.	The way this objective is written could give rise to conflict between residents and undermine the integrity of the zone.	Reject
SO184.11	Chris Teo-Sherrell			SO184.11	Chris Teo-Sherrell	MRZ-P1	Support	Retain as notified	I agree that the zone should enable primarily residential activity and buildings but also certain non-residential activity and buildings. People need somewhere to live and those places will be enriched by enabling some non-residential activity to be mixed in with the residential activity.	Accept
SO184.12	Chris Teo-Sherrell			SO184.12	Chris Teo-Sherrell	MRZ-P2	Amend	Amend by adding some words that would more clearly limit the degree of non-compliance with the permitted activity standards.	The critical words here are 'well designed and compatible'. These are quite subjective and so introduce a degree of uncertainty in the plan. Some limitation should be specified on the degree of non-compliance with the standards that is allowable.	Reject
SO184.13	Chris Teo-Sherrell			SO184.13	Chris Teo-Sherrell	MRZ-P3	Amend	Use less subjective words in 1-4 and 6-7	This is good in that it provides greater specificity but it still includes lots of subjective words like 'responds to', 'good level', 'appropriately-	Reject

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SO184.14	Chris Teo-Sherrell			SO184.14	Chris Teo-Sherrell	MRZ-P3	Amend	Amend point 5 - 'Development* frontages provide a legible connection to the street' by inserting 'and direct visual' after 'legible'	The suggested insertion is to prevent the use of fences and vegetation inside the site to block view of street from the front facade	Reject
SO184.15	Chris Teo-Sherrell			SO184.15	Chris Teo-Sherrell	MRZ-P4	Amend	Insert 'on-site,' after 'safe'	It is unclear where the safe turning and manoeuvring is meant to occur. Other provisions suggest turning and manoeuvring is supposed to be off-street rather than on-street to help maintain the safety and efficiency of the transport network.	Accept
SO184.16	Chris Teo-Sherrell			SO184.16	Chris Teo-Sherrell	MRZ-P5	Support	Retain points 1-5 as notified	Non-residential activities are essential to create a zone in which people want to live and develop community. Without them, the zone will end up as a car dependent sleeper zone which everyone has to leave to meet their daily needs and wants.	Accept
SO184.17	Chris Teo-Sherrell			SO184.17	Chris Teo-Sherrell	MRZ-P5	Oppose	Delete '6. Do not affect the City's business zone hierarchy.'	The existing hierarchy of business zones is a highly car centric one. The nature of work and commerce has changed dramatically in recent years. There is now both the ability for many occupations to be undertaken from anywhere and the desire of many people to work from home. Having quiet and clean retail, service and hospitality activities in the MRZ will result in more destinations being within walking distance of people's homes contributing to both local community connectedness and the ability of resident to live car-light lives.	Reject
SO184.18	Chris Teo-Sherrell			SO184.18	Chris Teo-Sherrell	MRZ-P6	Amend	Replace ' That off-site stormwater peak flows' with 'That peak flows of stormwater leaving a site'	'Off site stormwater peak flows' are those that occur in the street or on other land other than on the site in question. It is too difficult to tie off-site flows with development of single sites because the contribution of any single site to stormwater flows off-site is miniscule but the cumulative effect of many miniscule increases could be catastrophic. So needs to be the peak flow rate of stormwater leaving a site that is maintained at pre-development levels.	Reject
SO184.19	Chris Teo-Sherrell			SO184.19	Chris Teo-Sherrell	MRZ-P7	Amend	Insert '6. That peak flows of stormwater leaving a site following intensification of a site are maintained at pre development* levels.'	Should be at least the same as in parts of the MRZ not covered by the Stormwater Overlay	Reject
SO184.20	Chris Teo-Sherrell			SO184.20	Chris Teo-Sherrell	MRZ-P8	Support	Retain as notified	This is best practice. The past approach has been good at providing and disposing of water but is less well-suited to protecting freshwater ecosystems, using water efficiently or coping with intense rainfall events so incorporating water sensitive design methods will be an improvement.	Accept
SO184.21	Chris Teo-Sherrell			SO184.21	Chris Teo-Sherrell	MRZ-P9	Amend	Insert 'and plastic' after 'zinc'.	Not only copper and zinc are having adverse effects on aquatic life – microplastics are too. These are likely to be produced by degradation of plastic building materials over time.	Reject
SO184.22	Chris Teo-Sherrell			SO184.22	Chris Teo-Sherrell	MRZ-P10	Support	Retain as notified	This is sensible both from the perspective of the comfort of residents but also from economic and environmental perspectives. Both enabling enough solar access and preventing excessive solar exposure will be important as the climate changes and more longer periods of intense heat occur.	Accept
SO184.23	Chris Teo-Sherrell			SO184.23	Chris Teo-Sherrell	MRZ-P11	Support	Not stated	Infrastructure isn't defined in Chapter 4. Roading and railways and airports, water and gas pipes, communications and energy cables are all infrastructure. Are all of these things meant by the use of this term here?	Accept

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SO184.24	Chris Teo-Sherrell			SO184.24	Chris Teo-Sherrell	MRZ-P12	Amend	Replace 'b. Use locally sourced species' with 'b. use plants grown from locally-sourced seeds where native species are used.'	The way b. is currently written could be taken to mean that replacement plants must be grown locally or that they must be native species. I do not agree with this. Exotics must still be allowed as they are far more suitable in many cases because of their deciduous nature enabling winter sun access. Very few native species are deciduous. However, where native species should be used if possible to try to help prevent contamination of local gene pools which is important in maintaining biodiversity.	Accept in part
SO184.25	Chris Teo-Sherrell			SO184.25	Chris Teo-Sherrell	MRZ-P13	Amend	Replace 'Rangitane o Manawatū' with 'the hapu with mana whenua over the land in question'	The proposed wording is more general and helps explain the reason for the provision.	Reject
SO184.26	Chris Teo-Sherrell			SO184.26	Chris Teo-Sherrell	MRZ-R1	Support	Retain as notified	This is the main purpose of the zone	Accept
SO184.27	Chris Teo-Sherrell			SO184.27	Chris Teo-Sherrell	MRZ-R2	Amend	In R2.1(d) replace 'do not create a dust nuisance' with 'must comply with R 10.7.1.5 Home Occupations (c)'	'Dust nuisance' is too vague. R 10.7.1.5 already provides a suitable standard that provides a measurable way to access an activity.	Accept in part
SO184.28	Chris Teo-Sherrell			SO184.28	Chris Teo-Sherrell	MRZ-R2	Amend	In R2.1(f) change 'or motor vehicles' to 'of motor vehicles'. Delete 'excluding the residents' motor vehicles'. Or Insert after 'excluding' the words 'repair or maintenance activities listed in Appendix XX on'	I have a recent experience of neighbours repairing and painting vehicles which appear to be their own, creating noise and odour at all times of day and night. The adverse effects occur irrespective of whether vehicles are the residents' or belong to other people.	Reject
SO184.29	Chris Teo-Sherrell			SO184.29	Chris Teo-Sherrell	MRZ-R2	Amend	In R2.1(h) replace 7.00 am to 10.00 pm' with '7.00 am to 7.00 pm' . Replace 'Monday to Saturday' with 'Monday to Friday'.	This would make it the same as for home child care services and more appropriate for a residential area where young children and others may be trying to sleep or people may be wanting to have the quiet enjoyment of their own property after an active day or week away from it. Some provision could be made for hospitality businesses which might especially be wanted by residents at weekends, or perhaps parts of the zone such as along urban connector (arterial and collector) streets could allow longer hours and more days while local streets have tighter restrictions.	Reject
SO184.30	Chris Teo-Sherrell			SO184.30	Chris Teo-Sherrell	MRZ-R2	Amend	In R2.1(l) need to decrease the hours in R10.8.1 from 7am to 10pm and 10pm to 7am to 7 am to 7 pm and 7 pm to 7 am for LAeq (15mins) and night-time Lmax . Also need a day-time (7 am to 7 pm) Lmax. These limits should not apply only to fixed mechanical plant but also to non-fixed machines and the activities of people with short-term exclusions allowed for certain activities.	This is in recognition of the higher density of buildings and decreased vegetation providing less attenuation of noise and the increased number of people likely to be using the zone resulting in more noise. Also, a lot of noise is nowadays generated by mobile equipment. R10.8.1 doesn't adequately address the noise of workers, radios etc. Need a day-time (7 am to 7 pm) Lmax also in recognition of all the nightshift workers and others who may need to sleep in the daytime as well as the increasing number of people working from home.	Reject
SO184.31	Chris Teo-Sherrell			SO184.31	Chris Teo-Sherrell	MRZ-R3	Amend	At R3.1(d) Need to decrease the hours in R10.8.1 from 7am to 10pm and 10pm to 7am to 7 am to 7 pm and 7 pm to 7 am for LAeq (15mins) and night-time Lmax . Also need a day-time (7 am to 7 pm) Lmax. These limits should not apply only to fixed mechanical plant but also to non-fixed machines and the activities of people with short-term exclusions allowed for certain activities.	R10.8.1 doesn't adequately deal with the noise potentially generated by 4 children.	Reject
SO184.32	Chris Teo-Sherrell			SO184.32	Chris Teo-Sherrell	MRZ-R4	Amend	At R4.1(c)(i) Insert after 'access*' 'except that residential developments of three or less dwelling units with access onto a Local Road are not exempt from this requirement.'	20.4.2(a)(vi)(h) exempts residential developments of 3 or fewer dwelling units with access onto a Local Road from maintaining a pedestrian visibility splay. This exemption should not exist for community houses or any other development in the MRZ. With a higher density of pedestrians in the MRZ it is even more appropriate that pedestrian visibility splays be required.	Reject

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SO184.33	Chris Teo-Sherrell			SO184.33	Chris Teo-Sherrell	MRZ-R4	Amend	Add a requirement for the front of any garage or carport facing a public road to be at least 6.5m away from the front boundary.	This is so as to achieve the same result as in R20.4.2.(e) Loading space provision (ii)(b) 'does not adversely affect traffic flow along the street frontage for pedestrians ...'. Not providing this commonly results in impedance and/or endangerment of pedestrians by vehicles protruding over the footpath as people mostly seem to want to walk around the front of their vehicles not the rear.	Reject
SO184.34	Chris Teo-Sherrell			SO184.34	Chris Teo-Sherrell	MRZ-R5	Amend	Add a requirement for any parking space between garage /carport and front property boundary adjoining a public road or the accessway to the site to be at least 6.5m long .	This is so as to achieve the same result as in R20.4.2.(e) Loading space provision (ii)(b) 'does not adversely affect traffic flow along the street frontage for pedestrians ...'. Not providing this commonly results in impedance and/or endangerment of pedestrians by vehicles protruding over the footpath as people mostly seem to want to walk around the front of their vehicles not the rear.	Reject
SO184.35	Chris Teo-Sherrell			SO184.35	Chris Teo-Sherrell	New rule	Amend	Insert a further land use rule as follows: 'MRZ-RX Erection of shared parking buildings. Activity status: Permitted where the following standards are complied with' coupled with the development of a number of suitable standards.	This would provide for separate ownership of parking spaces, encourage mode shift, enable more efficient land use, creation of streets which prioritise place function. Parking buildings could be limited to specific locations and be subject to similar standards as other buildings plus additional specific standards. Currently it is unclear whether such land use would be considered compatible with the residential nature of the zone.	Reject
SO184.36	Chris Teo-Sherrell			SO184.36	Chris Teo-Sherrell	MRZ-S1	Amend	Replace '11m' with '10m'. Replace '50%' by '5%' in the exception.	A building's height is a major determinant of not only its dominance effect but also of the amount of shade it creates. Allowing up to 5% of the roof in elevation to exceed 10m still provides for antennae, satellite dishes, architectural features etc without risking creating excessive additional shading on neighbouring sites whereas 50% would cause shading for many hours each day in winter.	Reject
SO184.37	Chris Teo-Sherrell			SO184.37	Chris Teo-Sherrell	MRZ-S1	Amend	Replace 'Garages or accessory buildings may not exceed a maximum height of 2.8m above ground level.' with 'Garages attached to a dwelling may not exceed 4m above ground level while detached garages and accessory buildings on sites with a dwelling may not exceed 2.8m above ground level'.	This provides for car stacking, a way of more effectively using the ground area of a site, which will be important in the MRZ.	Accept in part
SO184.38	Chris Teo-Sherrell			SO184.38	Chris Teo-Sherrell	MRZ-S1	Amend	Delete ' * Solar panel and heating components attached to a building provided these do not exceed the height by more than 500mm;' Delete ' Satellite dishes, antennas*, aerials, flues, architectural or decorative features (e.g. finials and spires) provided that none of these exceed 1m in diameter and do not exceed the height by more than 2 metres measured vertically.' Insert 'Satellite dishes, antennas*, aerials, flues, chimneys, masts, architectural or decorative features (e.g. finials and spires) that protrude above 10m above ground must not exceed 1m in diameter and must not exceed the height by more than 2 metres measured vertically.'	The overall effect of these proposals would be to decrease shading on adjacent properties, probably one of the major concerns of residents, while still providing for a small range of roof angles as well as for solar panels and other structures on the roof.	Reject
SO184.39	Chris Teo-Sherrell			SO184.39	Chris Teo-Sherrell	MRZ-S1	Amend	Insert '2. Shading effects on adjoining residential sites.'	Shading of neighbouring sites is likely to be one of the major adverse effects of intensification, especially when the sun elevation is low as it is from April to September so should be a matter that decision makers can consider.	Reject
SO184.40	Chris Teo-Sherrell			SO184.40	Chris Teo-Sherrell	MRZ-S2	Amend	Replace the currently-proposed threshold values (i.e. 5m, 45°, 2.8m) with more appropriate ones. The exceptions be consistent with those for building height discussed above under MRZ R7.1(a)(i)	The currently-proposed thresholds will result in massive shading of neighbouring sites although this will depend on the orientation of the boundaries. probably needs different thresholds on the northern and	Reject

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SO184.41	Chris Teo-Sherrell			SO184.41	Chris Teo-Sherrell	MRZ-S3	Amend	a)Meaning of 'primary' needs to be made clear. b)Insert 'from a public road' after '5.5 metres'. c)Replace 'Front - 5.5 metres for that part of the frontage where a parking space is provided but no garage (internal or standalone).' with 'Front – where no garage (internal or standalone) or carport exists, 6.5 metres for that part of the frontage where a parking space is provided perpendicular to the public road and 5.5m where it is provided parallel to the public road.' d)Replace '1 metre' with '1 metre or, if there are no windows or doors in the wall facing the side and the wall is nonflammable, 0 metres.	For consistency and clarity. For (d) requiring a 1m setback wastes valuable space. It is of virtually no use except for walking along. It also seems to prevent the possibility of attached housing that is common in medium density zones overseas.	Accept in part
SO184.42	Chris Teo-Sherrell			SO184.42	Chris Teo-Sherrell	MRZ-S3	Amend	Replace '5.5 metres' with '6.5 metres' Replace '1 metre' with '1 metre or, if there are no windows or doors in the wall facing the side and the wall is non-flammable, 0 metres.'	This is so as to achieve the same result as in R20.4.2.(e) Loading space provision (ii)(b) 'does not adversely affect traffic flow along the street frontage for pedestrians ...'. Not providing this commonly results in impedence and/or endangerment of pedestrians by vehicles protruding over the footpath as people mostly seem to want to walk around the front of their vehicles not the rear.	Accept in part
SO184.43	Chris Teo-Sherrell			SO184.43	Chris Teo-Sherrell	MRZ-S3	Amend	Replace '3. A side entry garage must be set back a minimum of 1.5 metres from a boundary fronting a public road.' with 'Note: Side entry garages and carports are not permitted on sites adjacent to public roads.'	Side entry garages on front parts of sites adversely affect the visual connection between the dwelling building and the street. They also increase the area of hard surface compared with garages and carports located to enable straight entry from the street.	Reject
SO184.44	Chris Teo-Sherrell			SO184.44	Chris Teo-Sherrell	MRZ-S4	Amend	Insert between 'coverage' and 'must' the words 'of all buildings combined on the site.' Delete both of the exceptions listed.	This insertion would make it clear that coverage includes all buildings on the site so that garages and accessory buildings whether attached to the main dwelling or not are included in the calculation of coverage.	Accept
SO184.45	Chris Teo-Sherrell			SO184.45	Chris Teo-Sherrell	MRZ-S5	Amend	Replace '20%' with '30%'.	The beneficial effects of vegetation on resident health and well-being is well recognised. The more the better. 20% of a 150m2 site is only 30m2, a very small area hence the request to increase this proportion.	Reject
SO184.46	Chris Teo-Sherrell			SO184.46	Chris Teo-Sherrell	MRZ-S5	Amend	Replace '30%' with '50%'	The areas between buildings on front sites and the public road is very important for creating the sort of streetscape which will invite people to walk along, and interact on, it. Such pedestrian activity is critical to a well functioning urban area, especially if development is intensified.	Reject
SO184.47	Chris Teo-Sherrell			SO184.47	Chris Teo-Sherrell	MRZ-S5	Amend	Add 'No vegetation may be used to interrupt the visual connection between windows and doors in the front facade of the ground floor of a building on a front site with a public road.' and 'Note: This means that there must be a direct line of sight, between 1.0m and 2.5m height, maintained from each window and door in the front facade to the street although short-term obstruction is permissible in the first 5 years after occupation while any trees planted grow above this height.'	In some cases where the front fencing requirements included in this PC have been implemented in recent redevelopments, residents have planted hedges or other vegetation that has effectively blocked the sight of the street from the building closest to the street, largely defeating the purpose of the fencing requirement.	Reject
SO184.48	Chris Teo-Sherrell			SO184.48	Chris Teo-Sherrell	MRZ-S6	Amend	Delete 'ground level' from 2. Delete 3.	There seems to be a contradiction between 2 and 3. A ground floor residential unit requires either 10 or 15m2 (under 2) or 2.5 or 4m2 (under 3). The apparent contradiction should be removed. The need for shaded area is the same whether provided at ground level or above ground level so I can't see the rationale for having different requirements according to where the shade is provided.	Reject

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SO184.49	Chris Teo-Sherrell			SO184.49	Chris Teo-Sherrell	MRZ-S7	Amend	Replace '2. Where the outdoor living space is provided at ground level it must provide' with '2. The outdoor living space must be.' Replace 3 with '3. The minimum areas stated in 2 may be split across one or more storeys.'	The need for outdoor living space is the same whether it is provided at ground level or above ground so if the replacement of 2 obviates the need for the original 3. Further, outdoor living space should be able to be provided at any level or even be split across levels. There may be benefits in doing so in terms of ease of access for residents but also in residents being able to use the area where the temperature, amount of shade or wind is most to their liking. If 3 is retained then the omission of papakainga from 3 (as well as from 2) needs addressing so that the requirements apply to all three categories of dwelling as indicated by MRZ-S7 (1).	Reject
SO184.50	Chris Teo-Sherrell			SO184.50	Chris Teo-Sherrell	MRZ-S8	Amend	It is not clear at what distance from the window the observer is assumed to be, yet this determines the width of the outlook space. It is not clear how the part that says 'MRZ-S9 does not apply to: •Deck balustrades, pergolas, verandas, porches and other building overhangs.' applies to this standard. Has it been misplaced?	Not stated.	Accept in part
SO184.51	Chris Teo-Sherrell			SO184.51	Chris Teo-Sherrell	MRZ-S9	Amend	Replace '30%' with '50%'.	This PC is very likely to lead to an increase in total non permeable surface area because it proposes to increase the permissible building coverage to 50% from the 30-40% currently allowed. Also, the smaller sites (as low as 150m2) envisaged with intensification will result in more land being covered for accessways etc. So a higher percentage than the 30% proposed is needed to help counter the effect of the increase in impermeable area.	Reject
SO184.52	Chris Teo-Sherrell			SO184.52	Chris Teo-Sherrell	MRZ-S10	Support	Retain as notified	Such devices whether they are constructed tanks or swales or other things will be essential for helping to achieve no net increase in the peak flow of stormwater from sites.	Accept in part
SO184.53	Chris Teo-Sherrell			SO184.53	Chris Teo-Sherrell	MRZ-S11	Support	Retain as notified	These are sensible given the possibility of flooding cannot be completely removed.	Accept in part
SO184.54	Chris Teo-Sherrell			SO184.54	Chris Teo-Sherrell	MRZ-S12	Support	Retain as notified	Having windows in any facade facing the road is important in creating the visual connection between the street and the site, enabling passive surveillance and the opportunity for interaction between people on site and those on the street. It also helps to decrease the dominance of the buildings, especially if they are close to the street.	Accept in part
SO184.55	Chris Teo-Sherrell			SO184.55	Chris Teo-Sherrell	MRZ-S13	Support	Retain as notified	Not stated.	Accept
SO184.56	Chris Teo-Sherrell			SO184.56	Chris Teo-Sherrell	MRZ-S14	Amend	Replace 'Any garage door facing a public road or an access way must not occupy more than half the width of the building façade to which it relates.' with 'Any garage door facing a public road must not occupy more than a third of the width of the building façade in which it is located.' and 'Any garage door facing an accessway must not occupy more than half the width of the width of the building façade in which it is located.'	Half is too much for the facade facing the street. It would create a visually dominant effect at eye level. This is less a concern on accessways because those are mostly use by much smaller numbers of people.	Reject
SO184.57	Chris Teo-Sherrell			SO184.57	Chris Teo-Sherrell	MRZ-S14	Amend	Replace 'Multiple garages facing a public road or access way must not comprise more than half the width of the frontage for that site.' with 'Multiple garages facing a public road must not comprise more than a third of the width of the frontage for that site.' and 'Multiple garages facing an accessway must not comprise more than a half of the width facade along that side of the site	Half is too much for the facade facing the street. It would create a visually dominant effect at eye level. This is less a concern on accessways because those are mostly use by much smaller numbers of people.	Reject
SO184.58	Chris Teo-Sherrell			SO184.58	Chris Teo-Sherrell	MRZ-S15	Amend	Replace 'a. must not comprise more than 50% of the width of the residential unit's façade to which it relates;' with 'a. must not comprise more than a third of the width of the residential unit's facade closest to the road'. Replace '5.5m' with '6.5m'. Insert 'd. Parking shall be provided for no more than 2 motor vehicles between the building and the public road'	Allowing 50% of the front area to be used for parking is too much. It should match the maximum proportion of the front facade that can be taken up by a garage door, i.e. 30%	Reject

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SO184.59	Chris Teo-Sherrell			SO184.59	Chris Teo-Sherrell	MRZ-S16	Amend	Replace '8m' with '15m except where access is required to rear sites in which case 1 additional crossing may be provided per total frontage'.	The existing residential zone rule is 1 crossing per 30m of frontage which means the vast majority of properties can have only 1 vehicle crossing. Vehicle crossings are challenging to pedestrians, including people in wheelchairs, and they can create trip hazards.	Reject
SO184.60	Chris Teo-Sherrell			SO184.60	Chris Teo-Sherrell	MRZ-S17	Support	Retain as notified	I strongly support what looks in Fig 8 to be a requirement to enter a site frontwards and to exit a site frontwards because of the increase in visibility of the footpath and the rest of the street attained by doing so and the consequent increase in safety for pedestrians	Accept in part
SO184.61	Chris Teo-Sherrell			SO184.61	Chris Teo-Sherrell	MRZ-S18	Amend	Insert "no less than" between 'of' and '1'. Need to define what is meant by a bicycle park as it seems not to be defined anywhere.	The intention is surely to provide at least this number rather than only exactly that number of bicycle parks. Is a tree or a fence a bicycle park or does a bicycle park have to have some particular form?	Accept
SO184.62	Chris Teo-Sherrell			SO184.62	Chris Teo-Sherrell	MRZ-S19	Amend	Replace '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 'Each residential unit must have access to a rubbish storage area which is sized to accommodate one 240l wheelie bin and one recycling crate and which is screened so as not to be visible from a public road.'	This is especially important for the attractiveness of the front dwelling. Many people would regard the sight of rubbish receptacles from the street as undesirable.	Accept in part
SO184.63	Chris Teo-Sherrell			SO184.63	Chris Teo-Sherrell	MRZ-S19	Amend	The whole DP should be updated to reflect the national system.	Although 'Arterial' and 'Collector' match the terms used in DP section 20.6, they do not match the NZ system of road nomenclature, the One Network Framework classification.	Reject
SO184.64	Chris Teo-Sherrell			SO184.64	Chris Teo-Sherrell	MRZ-S20	Amend	Delete 'must not' from the lead in sentence for 2. In a. insert 'Must not' before 'exceed'. In b. replace 'For any' with 'Any'. In b. insert ';' and 'after 'construction'. Add 'c. Any part of a fence or standalone wall within 2.0m of an access way must be no more than 1.1m tall or of open construction.' The reference to MRZ-S16.2 doesn't make sense as there is no MRZ-S16.2. It is not clear what it should be.	The insertion of c. is consistent with R.20.4.2(a)(vi)(h) that requires visibility splays.	Accept in part
SO184.65	Chris Teo-Sherrell			SO184.65	Chris Teo-Sherrell	MRZ-S20	Amend	In point 3, replace 'access leg' with 'access way' Add 4. 'No more than 1 fence or standalone wall or other visual barrier may be erected between the front facade and the front boundary.'	Access legs seem to refer only to access ways to rear sites (Chapter 4 – definitions).	Accept in part
SO184.66	Chris Teo-Sherrell			SO184.66	Chris Teo-Sherrell	MRZ-S21	Amend	Change 'relive' to a more commonly understood word.	Couldn't find any definition of 'relive' in chapter 4 or online in connection with mechanical ventilation.	Accept
SO184.67	Chris Teo-Sherrell			SO184.67	Chris Teo-Sherrell	MRZ-R7	Amend	Delete reference to R20.4.2(a)(vi)(d). Insert in ii) after j) 'except the exemption from providing a pedestrian visibility splay for residential developments of three or less dwelling units with access onto a Local Road in R20.4.2(a)(vi)(h) will not apply in the MRZ.'	R20.4.2(a)(vi)(d) doesn't apply to any streets in the proposed zone as it only includes streets with posted speed limits of 70km/h or greater. The exemption in (h) is highly inappropriate in the MRZ where pedestrian numbers are expected to be greater and the number of times the footpath is crossed by vehicles each day is expected to be higher because of the intensification.	Accept in part
SO184.68	Chris Teo-Sherrell			SO184.68	Chris Teo-Sherrell	MRZ-R8	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.69	Chris Teo-Sherrell			SO184.69	Chris Teo-Sherrell	MRZ-R9	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.70	Chris Teo-Sherrell			SO184.70	Chris Teo-Sherrell	MRZ-R10	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.71	Chris Teo-Sherrell			SO184.71	Chris Teo-Sherrell	MRZ-R11	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.72	Chris Teo-Sherrell			SO184.72	Chris Teo-Sherrell	MRZ-R12	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.73	Chris Teo-Sherrell			SO184.73	Chris Teo-Sherrell	MRZ-R13	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.74	Chris Teo-Sherrell			SO184.74	Chris Teo-Sherrell	MRZ-R14	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.75	Chris Teo-Sherrell			SO184.75	Chris Teo-Sherrell	MRZ-R15	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO184.76	Chris Teo-Sherrell			SO184.76	Chris Teo-Sherrell	MRZ-R16	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.77	Chris Teo-Sherrell			SO184.77	Chris Teo-Sherrell	MRZ-R17	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO184.78	Chris Teo-Sherrell			SO184.78	Chris Teo-Sherrell	MRZ-R18	Amend	Make consistent amendments to the standards applying to this rule.	Not stated.	Accept in part
SO185.1	Phocus Planning			SO185.1	Phocus Planning	MRZ-O1	Support	Retain as notified	Not stated.	Accept
SO185.2	Phocus Planning			SO185.2	Phocus Planning	MRZ-O2	Support	Retain as notified	Not stated.	Accept in part
SO185.3	Phocus Planning			SO185.3	Phocus Planning	MRZ-O3	Support	Retain as notified	Aligns with One Plan & Rangitāne IMP	Accept
SO185.4	Phocus Planning			SO185.4	Phocus Planning	MRZ-O4	Support	Retain as notified	Appropriate, and allows for development where effects can be mitigated.	Accept
SO185.5	Phocus Planning			SO185.5	Phocus Planning	MRZ-O5	Support	Retain as notified	Appropriate to ensure effects are managed near infrastructure.	Accept
SO185.6	Phocus Planning			SO185.6	Phocus Planning	MRZ-O6	Support	Retain as notified	Not stated.	Accept
SO185.7	Phocus Planning			SO185.7	Phocus Planning	MRZ-P1	Support	Retain as notified	Allows for and enables appropriate activities.	Accept
SO185.8	Phocus Planning			SO185.8	Phocus Planning	MRZ-P2	Support	Retain as notified	Not stated.	Accept
SO185.9	Phocus Planning			SO185.9	Phocus Planning	MRZ-P3	Support in part	Amend – 5. Development* frontages provide a legible connection to the street through a combination of orientation, entrance location, fencing, and glazing, and they are not dominated by garages; 6. Developments* integrate a reasonable amount of landscaping with building and access* design; 7. They provide a reasonable amount of visual interest through the modulation and articulation of façades and roof forms.	Amended wording provides greater flexibility for the assessment of developments rather than being 100% prescriptive of what design elements are required. Not all allotment shapes and sizes will be suited to achieve the specified design elements. Affordability of implementing all of these design measures needs to be balanced with being able to provide affordable housing supply.	Accept in part
SO185.10	Phocus Planning			SO185.10	Phocus Planning	MRZ-P4	Support in part	Amend on-site bicycle parking. Wording changed to " encourage on site bicycle parking ", rather than it "is provided".	While we accept that bicycles and active modes of transport should be encouraged and provide a range of benefits, not everyone is able to use other modes of transport, such as bicycles, and it is illogical to require bicycles where this may be the case. It is onerous to require every development to provide on site bicycle parking. Needs to be left to individual choice.	Reject
SO185.11	Phocus Planning			SO185.11	Phocus Planning	MRZ-P5	Support	Retain as notified	Not stated.	Accept
SO185.12	Phocus Planning			SO185.12	Phocus Planning	MRZ-P6	Support	Retain as notified	Not stated.	Accept
SO185.13	Phocus Planning			SO185.13	Phocus Planning	MRZ-P7	Support in part	Amend	Policy needs re-wording. It may be appropriate to not require a stormwater management plan for a small development where it clearly has no adverse effect (i.e. garden shed/ pergola). Otherwise, there is a risk of developments falling foul of this policy. Onerous to by default require all development to be supported by an SMP.	Accept in part
SO185.14	Phocus Planning			SO185.14	Phocus Planning	MRZ-P8	Support	Amend Add in words "to a scale commensurate with the scale of the subdivision or development"	Policy needs rewording so as to reflect that not all development will require water sensitive design, or that it may not be possible for some very small development (i.e garden shed)	Accept in part
SO185.15	Phocus Planning			SO185.15	Phocus Planning	MRZ-P9	Support	Retain as notified	Not stated.	Accept in part
SO185.16	Phocus Planning			SO185.16	Phocus Planning	MRZ-P10	Support	Retain as notified	Not stated.	Accept
SO185.17	Phocus Planning			SO185.17	Phocus Planning	MRZ-P11	Support	Retain as notified	Not stated.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO185.18	Phocus Planning			SO185.18	Phocus Planning	MRZ-P12	Support	Retain as notified	Not stated.	Accept in part
SO185.19	Phocus Planning			SO185.19	Phocus Planning	MRZ-P13	Support	Retain as notified	Not stated.	Accept
SO185.20	Phocus Planning			SO185.20	Phocus Planning	MRZ-R1	Support	Retain as notified	Provides an excellent opportunity for small businesses and working from home to be lawful, provided specific criteria are met.	Accept
SO185.21	Phocus Planning			SO185.21	Phocus Planning	MRZ-R2	Support	Retain as notified	Not stated.	Accept in part
SO185.22	Phocus Planning			SO185.22	Phocus Planning	MRZ-R3	Support	Re R3.1 - Not stated.	Not stated.	Accept in part
SO185.23	Phocus Planning			SO185.23	Phocus Planning	MRZ-R3	Support	Re R3.2 - Not stated.	Not stated.	Accept in part
SO185.24	Phocus Planning			SO185.24	Phocus Planning	MRZ-R4	Support	Not stated	Not stated.	Accept in part
SO185.25	Phocus Planning			SO185.25	Phocus Planning	MRZ-R5	Support	Not stated	Not stated.	Accept in part
SO185.26	Phocus Planning			SO185.26	Phocus Planning	MRZ-R7	Support	Retain as notified	Provides opportunities for housing/multi-unit development where relevant performance standards can be met.	Accept in part
SO185.27	Phocus Planning			SO185.27	Phocus Planning	MRZ-R8	Support	Not stated	Not stated.	Accept in part
SO185.28	Phocus Planning			SO185.28	Phocus Planning	MRZ-R9	Support in part	Amend wording	Seems overly restrictive to capture all and any type of structure. Approach needs to be rethought for very small structures and buildings. Requiring them to comply with all performance standards will result in an unintended consequence of very minor activities requiring resource consent.	Accept
SO185.29	Phocus Planning			SO185.29	Phocus Planning	MRZ-R10	Oppose	Amend to a permitted activity, with standards around ensuring adequate mitigations are imposed for development in these areas. E.g. FFL or attenuation. RDA pathway where these standards are not met.	Significant percentage of properties within this overlay. This will result in all new homes, alterations and garages (and other buildings) within these areas requiring RC, where effects can be managed via PA conditions.	Accept
SO185.29	Phocus Planning	FS01.11	Leith Consulting Limited	SO185.29	Phocus Planning	MRZ-R10	Support in part	Allow	Support the intent of the submission in so far as this will cause potential unintended consequences for small building alterations and structures I had not considered under my original submission.	Accept
SO185.30	Phocus Planning			SO185.30	Phocus Planning	MRZ-R11	Support in part	Only require compliance with height, HRB, Building coverage, permeable surfaces, and stormwater attenuation. Needs to also include yard setbacks.	Could infringe on neighbours having no yard separation.	Accept in part
SO185.31	Phocus Planning			SO185.31	Phocus Planning	MRZ-R12	Support	Not stated	Not stated.	Accept in part
SO185.32	Phocus Planning			SO185.32	Phocus Planning	MRZ-R13	Support	Not stated	Not stated.	Accept in part
SO185.33	Phocus Planning			SO185.33	Phocus Planning	MRZ-R14	Support in part	Create new rule or amend rule/definition to accommodate smaller air bnb type arrangements. For example: HDC District Plan (REZ GRZ-R4) provides a permitted activity pathway for visitor accommodation for up to 4 people per site, which would allow for those smaller/air bnb type visitor accommodations.	Permitted Activity Standard allows visitor accommodation where it has a frontage and entrance with a major arterial or minor arterial road. Definition captures those renting their properties/homes for short term air bnb type arrangements, which will require RC if they are not located within those areas. Smaller air bnbs type arrangements are likely to have similar effects to those using their property for residential activities.	Accept
SO185.34	Phocus Planning			SO185.34	Phocus Planning	MRZ-R14	Support in part	Remove conflict in R14.2 with MRZ-R17.	Activity is permitted where: a. Visitor accommodation is located on properties with a frontage and the main entrance from a street listed as a Major Arterial or Minor Arterial Road in 20.6.1.1 and 20.6.1.2 in Section 20 of the District Plan. RDA pathway provided where performance standards are not met. In contrast, MRZ-R17 requires a discretionary activity pathway for: 'Visitor Accommodation with frontage to a Major Arterial or Minor Arterial Road as listed in Appendix 20A'. These rules are therefore conflicting.	Accept in part
SO185.35	Phocus Planning			SO185.35	Phocus Planning	MRZ-R15	Support	Not stated	Not stated.	Accept in part

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SO185.36	Phocus Planning			SO185.36	Phocus Planning	MRZ-R16	Support in part	Amend to include the words " unless the written approval to the proposal is provided ".	Avoids the need to limited notify an application if Rangitāne has provided their written approval.	Accept
SO185.37	Phocus Planning			SO185.37	Phocus Planning	MRZ-R17	Amend	Resolve conflict with MRZ-R14.	Rules are conflicting as visitor accommodation on arterial roads is both permitted and discretionary.	Accept
SO185.38	Phocus Planning			SO185.38	Phocus Planning	MRZ-R18	Support in part	Amend to remove performance standard relating to MRZ-S6.	Not clear the link or relationship to MRZ-S6 - Shade.	Accept
SO185.39	Phocus Planning			SO185.39	Phocus Planning	MRZ-R19	Support	Not stated	Rule logically refers to ensuring compliance with NZECP 34:2001.	Accept
SO185.40	Phocus Planning			SO185.40	Phocus Planning	MRZ-R20	Support	Not stated	Reasonable rule ensures adequate internal amenity. Allows buildings to be retrofitted where there is not a significant increase in floor area.	Accept in part
SO185.41	Phocus Planning			SO185.41	Phocus Planning	MRZ-R21	Support in part	Amend to include as a condition of MRZ-R22.	Logically would be included as a condition of MRZ-R22.	Reject
SO185.42	Phocus Planning			SO185.42	Phocus Planning	MRZ-R22	Support	Not stated	Reasonable rule which ensures adequate internal amenity and allows for retrofitting/extensions which do not significantly increase floor area.	Accept
SO185.43	Phocus Planning			SO185.43	Phocus Planning	MRZ-R23	Support in part	Further thought needs to be given and/or clarification around how architects, builders, planners will demonstrate compliance.	How will this be checked as part of a resource consent or building consent application? What information is expected to be provided to Council.	Reject
SO185.44	Phocus Planning			SO185.44	Phocus Planning	MRZ-R24	Oppose	There should be a PA rule	This is overly restrictive and will potentially capture activities that are having no effect and will thereby require consent. Why are garages being included when stormwater will be clean roof water? Stormwater from 4 car parks will have less effect than the roads adjacent. Treatment of stormwater should be the responsibility of the Council under whatever consenting requirements they themselves have. Can see difficulty with the interpretation of what is a car park vs. a driveway vs. an onsite maneuvering area vs. an impervious area.	Accept
SO185.44	Phocus Planning	FS01.10	Leith Consulting Limited	SO185.44	Phocus Planning	MRZ-R24	Support in part	Allow	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.	Accept in part
SO185.45	Phocus Planning			SO185.45	Phocus Planning	MRZ-S1	Support	Not stated	Logical rule which adequately manages density/bulk effects.	Accept in part
SO185.46	Phocus Planning			SO185.46	Phocus Planning	MRZ-S2	Support	Not stated	Appropriate boundary rules which adequately manage effects on neighbours.	Accept in part
SO185.47	Phocus Planning			SO185.47	Phocus Planning	MRZ-S3	Support in part	Amend to include a rear yard requirement consistent with the side yard provisions.	No rear yard could impact neighbouring properties. Building Act requires 1m setback where there is no fire resistance rating (FRR).	Accept
SO185.48	Phocus Planning			SO185.48	Phocus Planning	MRZ-S4	Support	Not stated	Reasonable standard. Other requirements will ensure appropriate density is maintained.	Accept in part
SO185.49	Phocus Planning			SO185.49	Phocus Planning	MRZ-S5	Support in part	Amend to remove specimen tree requirement.	Support landscaped area requirement and the principle of retaining green areas and space however the requirement to plant a specimen tree is overly restrictive. Clarification also required about location in the outdoor living space.	Reject
SO185.50	Phocus Planning			SO185.50	Phocus Planning	MRZ-S6	Oppose	Remove requirements	Conflicts with current practice, where daylight is also required in these spaces. Overly complex rule to enforce. Overregulation. Shading can be achieved by umbrellas, shade sails, and other means.	Accept
SO185.51	Phocus Planning			SO185.51	Phocus Planning	MRZ-S7	Support	Suggest clarifying what is a ground floor apartment to avoid debate, and conflicting views of what is/ isn't.	Sensible performance standards which ensures on-site amenity.	Reject
SO185.52	Phocus Planning			SO185.52	Phocus Planning	MRZ-S8	Oppose	Remove requirements	Overly complex rule to enforce/demonstrate compliance. Overregulation. Yard separation requirements will assist with achieving onsite amenity and privacy. Not clear how achievable these performance standards would be. Seems these standards will conflict with yard setback allowances.	Reject

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SO185.53	Phocus Planning			SO185.53	Phocus Planning	MRZ-S9	Support	Not stated	Not stated.	Accept
SO185.54	Phocus Planning			SO185.54	Phocus Planning	MRZ-S10	Oppose in part	Amend to resolve rule conflict	Permitted activity rule for buildings. RDA for buildings within SW overlay, yet attenuation is required. There should be an appropriate PA pathway (as with minimum FFL) to mitigate stormwater overlay risk and make dwellings in these areas permitted. Clarify that these structures do not require side yard encroachment consent to avoid the nonsensical outcome of them being located in the middle of the yard. Thought needs to be given to the situation where a landowner constructs for example a garden path on an existing site. Does that trigger the need for an attenuation device? Risk of unintentionally capturing some very minor activities.	Reject
SO185.55	Phocus Planning			SO185.55	Phocus Planning	MRZ-S11	Support	Not stated	Not stated.	Accept in part
SO185.56	Phocus Planning			SO185.56	Phocus Planning	MRZ-S12	Support in part	Amend wording	Current wording will capture all buildings? Example of small garden shed not having a window potentially triggering consent?	Accept
SO185.57	Phocus Planning			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	Reject
SO185.57	Phocus Planning	FS06.39	Kāinga Ora	SO185.57	Phocus Planning	MRZ-S13	Support	Allow	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.	Reject
SO185.58	Phocus Planning			SO185.58	Phocus Planning	MRZ-S14	Support	Not stated	Not stated.	Accept
SO185.59	Phocus Planning			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 maneuvering).	Reject
SO185.59	Phocus Planning	FS06.40	Kāinga Ora	SO185.59	Phocus Planning	MRZ-S15	Support	Allow	Kāinga Ora support the need for clarification to alterations to existing infringements	Reject
SO185.60	Phocus Planning			SO185.60	Phocus Planning	MRZ-S16	Support	Not stated	Reasonable to ensure traffic safety.	Accept in part
SO185.61	Phocus Planning			SO185.61	Phocus Planning	MRZ-S17	Support in part	Remove this requirement for local roads with 50km/hr speed limit or lower but require vehicle splays as a performance condition to maximize visibility	Question whether this is needed for the lowest order roads. Other district plans do not require this (Such as Napier City Council). Would provide additional area for developments.	Accept
SO185.62	Phocus Planning			SO185.62	Phocus Planning	MRZ-S18	Oppose	Remove requirements	Difficult to determine compliance, particularly where bicycle spaces are parked within residential units. Not always appropriate for the elderly or those with accessibility issues. We do not accept the argument that provision of these facilities will encourage mode shift.	Reject
SO185.63	Phocus Planning			SO185.63	Phocus Planning	MRZ-S19	Oppose in part	Remove requirements around screening.	This is infringing on property rights, whereby the Council is designating where people store rubbish, for aesthetic reasons? Difficult to ensure compliance with long term.	Reject
SO185.64	Phocus Planning			SO185.64	Phocus Planning	MRZ-S20	Support in part	Amend to remove open construction standard for the bulk of the fence along the public frontage.	We support the height reduction next to an access, to ensure pedestrian visibility. However, requiring open construction along the road frontage where a fence is higher than 1.1m infringes on privacy.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO185.65	Phocus Planning			SO185.65	Phocus Planning	MRZ-S21	Oppose	Delete standard	Building Act controls ventilation. Difficult to measure compliance.	Reject
SO185.66	Phocus Planning			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.	Reject
SO185.66	Phocus Planning	FS06.41	Kāinga Ora	SO185.66	Phocus Planning	SUB-MRZ-O1	Oppose	Allow	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	Accept
SO185.67	Phocus Planning			SO185.67	Phocus Planning	SUB-MRZ-P1	Support	Retain as notified	Not stated.	Accept
SO185.68	Phocus Planning			SO185.68	Phocus Planning	SUB-MRZ-P2	Support	Retain as notified	Not stated.	Accept
SO185.69	Phocus Planning			SO185.69	Phocus Planning	SUB-MRZ-P3	Support in part	Amend wording to include the following: "...existing natural hazards is avoided or where effective, appropriate mitigation measures are in place..."	Seems reasonable and aligns with Section 106 of the RMA. Mitigation is an acceptable form of managing adverse effects from natural hazards.	Accept in part
SO185.70	Phocus Planning			SO185.70	Phocus Planning	SUB-MRZ-P4	Support in part	Delete wording (preferably with experience in water sensitive design)	Not all development will require water sensitive design, or that it may not be possible for some very small development infill subdivision.	Reject
SO185.71	Phocus Planning			SO185.71	Phocus Planning	SUB-MRZ-P5	Support	Retain as notified	Reasonable to ensure that all allotments are appropriately serviced.	Accept
SO185.72	Phocus Planning			SO185.72	Phocus Planning	SUB-MRZ-R1	Support in part	Provide a controlled activity pathway for allotments in the stormwater overlay. Amend to remove the need to comply with the following performance standards: MRZ-S5.3 & .4 – Specimen Tree requirement MRZ-S6 MRZ-S8 MRZ-S10 MRZ – S11 MRZ-S12 MRZ-S13 MRZ-S14 MRZ-S15 MRZ-S-17 (for local roads with 50km/hr speed restriction or less) MRZ-S18 MRZ-S20	Stormwater overlay covers significant percentage of the rezoned area. Section 106 can still be used where there is natural hazard risk. Include a performance standard requiring provision of Stormwater Management details to demonstrate stormwater can be managed for sites within this area for controlled activity rule. We consider subdivision for infill subdivision to be overly restrictive. Do not need to demonstrate compliance with these matters for an existing dwelling on an allotment. Risk of process looking to use opportunity through this process to address existing, lawfully established non compliances.	Reject
SO185.73	Phocus Planning			SO185.73	Phocus Planning	SUB-MRZ-R1	Support in part	Remove the following: Requirement to comply with the following performance standards MRZ-S5.3 & .4 – Specimen Tree requirement MRZ-S6 MRZ-S8 MRZ-S10 MRZ – S11 MRZ-S12 MRZ-S13 MRZ-S14 MRZ-S15 MRZ-S-17 (for local roads with 50km/hr speed restriction or less) MRZ-S18 MRZ-S20	Stormwater overlay covers a significant percentage of the rezoned area. Section 106 can still be used where there is natural hazard risk. Include a performance standard requiring provision of Stormwater Management details to demonstrate stormwater can be managed for sites within this area for controlled activity rule. We consider subdivision for infill subdivision to be overly restrictive.	Accept in part
SO185.74	Phocus Planning			SO185.74	Phocus Planning	SUB-MRZ-R2	Support	Retain as notified	Not stated.	Accept in part
SO185.75	Phocus Planning			SO185.75	Phocus Planning	SUB-MRZ-R3	Support	Retain as notified	Not stated.	Accept
SO185.76	Phocus Planning			SO185.76	Phocus Planning	SUB-MRZ-R4	Support	Retain as notified	Not stated.	Accept
SO185.77	Phocus Planning			SO185.77	Phocus Planning	SUB-MRZ-R5	Support	Retain MRZ-R5.1 as notified	Not stated.	Accept
SO185.78	Phocus Planning			SO185.78	Phocus Planning	SUB-MRZ-R5	Support	Retain MRZ-R5.2 as notified	Not stated.	Accept
SO185.79	Phocus Planning			SO185.79	Phocus Planning	SUB-MRZ-S1	Support in part	Amend wording to: Matters of discretion where the standard is infringed	Not stated.	Accept
SO185.80	Phocus Planning			SO185.80	Phocus Planning	SUB-MRZ-S2	Support	Retain as notified	Not stated.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO185.81	Phocus Planning			SO185.81	Phocus Planning	SUB-MRZ-S3	Support in part	Amend wording to: Matters of discretion where the standard is infringed	Not stated.	Accept
SO185.82	Phocus Planning			SO185.82	Phocus Planning	SUB-MRZ-S4	Support in part	Amend wording to: Matters of discretion where the standard is infringed	Not stated.	Accept
SO186.1	Sheila Barrass			SO186.1	Sheila Barrass	MRZ-S3	Oppose	Increase side boundary to 3 metres	The effect of reduced light on existing single storey properties when new multi storey houses are built. I think the same considerations should be important for existing home owners as they are to the occupants of the new homes.	Reject
SO186.2	Sheila Barrass			SO186.2	Sheila Barrass	MRZ-S4	Amend	Take into consideration the existing building coverage so you build houses in the centre of a section.	If the building coverage is up to 50% of the site why do they need to build so near to an existing side boundary?	Reject
SO187.1	Fiona Wilson			SO187.1	Fiona Wilson	Zone Extent	Oppose	Amend area of zone.	I question how the decision was made to include my property on Park Road in this area and yet properties only 150 meters from mine are not included?	Reject
SO187.2	Fiona Wilson			SO187.2	Fiona Wilson	MRZ-R7	Oppose	Delete the proposal for three buildings of up to 11 metres high to be allowed	This Linton Street development of three units on a single section is only two stories high but has already encroached on my backyard privacy and more so on my immediate neighbours. Furthermore these properties were not sold despite being on the market for some time so have been rented out resulting in tenants with large and noisy dogs on pocket sized areas.	Reject
SO187.3	Fiona Wilson			SO187.3	Fiona Wilson	Reserves rezoning	Oppose	Do not rezone Huia Street Reserve.	Opposed to the reserve being included in the MRZ	Reject
SO188.1	Te Pū Harakeke—Community Collective Manawatū			SO188.1	Te Pū Harakeke—Community Collective Manawatū	Entire Plan Change	Support	Retain as notified	We have an urgent housing crisis in Papaioea. Our most vulnerable populations are hit the hardest. Any solution created for the housing issue must keep this in mind to be effective.	Accept
SO189.1	Therese McManus			SO189.1	Therese McManus	Zone Extent	Amend	Remove area from Featherston Street to Russell Street from the MRZ.	Specifically concern about the area from Featherston Street to Russell Street, because of existing increased traffic from developments such as Mitre 10 and outlet stores and additional traffic from more intensive housing.	Reject
SO190.1	Russell Gibson			SO190.1	Russell Gibson	Entire Plan Change	Oppose	Delete the plan change.	Higher density housing will come with more on-street parking, loss of privacy, loss of sunlight, overcapacity schools.	Reject
SO191.1	Robert and Gill Norris			SO191.1	Robert and Gill Norris	MRZ-P1	Support	Not stated	Not stated.	Accept
SO191.2	Robert and Gill Norris			SO191.2	Robert and Gill Norris	MRZ-P2	Oppose	Delete	Residential activities or buildings that do not meet "permitted activity standards" should not be permitted.	Reject
SO191.3	Robert and Gill Norris			SO191.3	Robert and Gill Norris	MRZ-P3	Oppose	Noise and safety protection for surrounding properties	Criteria do not address what is acceptable in terms of people density and vehicle numbers.	Reject
SO191.4	Robert and Gill Norris			SO191.4	Robert and Gill Norris	MRZ-P4	Support	Not stated	Not stated.	Accept in part
SO191.5	Robert and Gill Norris			SO191.5	Robert and Gill Norris	MRZ-P5	Support	Note the earlier MRZ-P2 is blurring residential and non-residential. This blurring should be avoided.	Not stated.	Accept in part
SO191.6	Robert and Gill Norris			SO191.6	Robert and Gill Norris	MRZ-P6	Support	Add 5.Those sites lying in or adjacent to existing ponding areas where building was previously prohibited be subject to rigorous flooding risk assessment and mitigation thereof. 6 Add that preventive measures may not be subsequently impaired	People make changes over me that increase the risk of flash flooding e.g. by replacing lawns and gardens with impermeable paving etc.	Accept in part
SO191.7	Robert and Gill Norris			SO191.7	Robert and Gill Norris	MRZ-P7	Oppose	Not stated	Council is already approving developments that were not allowed in the past and increase the risk of flooding.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO191.8	Robert and Gill Norris			SO191.8	Robert and Gill Norris	MRZ-P13	Amend	Delete enablement of papakāinga. For marae, attention to be paid to: Distance from residential areas. Air noise control Appropriate road access reducing likelihood of interfering with general traffic flow. Adequate on-site parking	Not stated.	Reject
SO191.9	Robert and Gill Norris			SO191.9	Robert and Gill Norris	MRZ-R1	Oppose	Requires clearer definition.	Not stated.	Reject
SO191.10	Robert and Gill Norris			SO191.10	Robert and Gill Norris	MRZ-R2	Amend	Add requirement for adequate on-site parking	Not stated.	Reject
SO191.11	Robert and Gill Norris			SO191.11	Robert and Gill Norris	MRZ-R3	Support	Not stated	Not stated.	Accept in part
SO191.12	Robert and Gill Norris			SO191.12	Robert and Gill Norris	MRZ-R4	Amend	Limit on numbers of residents and cars	Unclear if 3 employees is number on site at any one time or total employed.	Reject
SO191.13	Robert and Gill Norris			SO191.13	Robert and Gill Norris	MRZ-R5	Support	Not stated	Not stated.	Accept in part
SO191.14	Robert and Gill Norris			SO191.14	Robert and Gill Norris	MRZ-R6	Support	Not stated	Not stated.	Accept in part
SO191.15	Robert and Gill Norris			SO191.15	Robert and Gill Norris	MRZ-R7	Amend	In addition to compliance with other required standards, for some dwellings such as papakainga there may need to be a specified limit on the number of residents. Also require enhanced fire alarm and sprinkler systems.	Increased probability of disturbance to adjacent residences. Personal safety and also risk to adjacent proper es	Reject
SO191.16	Robert and Gill Norris			SO191.16	Robert and Gill Norris	MRZ-R8	Oppose	In addition to compliance with other required standards, for some dwellings such as papakainga there may need to be a specified limit on the number of residents. Also enhanced fire alarm and sprinkler systems.	Increased probability of disturbance to adjacent residences. Personal safety and also risk to adjacent proper es Also unclear on applicable area of land. Could be multiple businesses run from homes	Reject
SO191.17	Robert and Gill Norris			SO191.17	Robert and Gill Norris	MRZ-R9	Oppose	Should require council consideration and not be permitted automatically	Difficulties already arise where owners have made unauthorised changes and councils appear very reluctant to require correction.	Reject
SO191.18	Robert and Gill Norris			SO191.18	Robert and Gill Norris	MRZ-R10	Oppose	Adjust – Subject to council considerations and only in exceptional circumstances will council permit mitigation which is being sought to add to demands on stormwater management	in this time of climate change and increasing risk to city properties of flooding Particularly with Palmerston North's mainly flat topography and dependence on stop banks and flood overflow areas.	Reject
SO191.19	Robert and Gill Norris			SO191.19	Robert and Gill Norris	MRZ-R11	Amend	Include compliance rules as in MRZ S9 and S10	Not stated.	Accept
SO191.20	Robert and Gill Norris			SO191.20	Robert and Gill Norris	MRZ-R12	Amend	Add indication of number to be educated in relation to land area and adequacy of facilities for the number	To avoid inappropriate density, noise, traffic disturbance in neighbourhood.	Reject
SO191.21	Robert and Gill Norris			SO191.21	Robert and Gill Norris	MRZ-R13	Oppose	Restrict areas where more noisy activities likely. Increase separation between buildings and facilities from boundary with 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. Not compatible with quiet enjoyment.	Reject
SO191.22	Robert and Gill Norris			SO191.22	Robert and Gill Norris	MRZ-R14	Support	Not stated	Not stated.	Accept in part
SO191.23	Robert and Gill Norris			SO191.23	Robert and Gill Norris	MRZ-R15	Support	Not stated	Not stated.	Accept in part
SO191.24	Robert and Gill Norris			SO191.24	Robert and Gill Norris	MRZ-R16	Oppose	Need limits on to parts of city This is not about accommodating people in homes. Attention to be paid to: Distance from residential areas. Air noise control Appropriate road access reducing likelihood of interfering with general traffic flow. Adequate on-site parking	Marae activities are commonly largely carried out outside as well as inside, may have large numbers of attendees and functions which may last over several days.	Reject
SO191.25	Robert and Gill Norris			SO191.25	Robert and Gill Norris	MRZ-R17	Support	Not stated	Not stated.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO191.26	Robert and Gill Norris			SO191.26	Robert and Gill Norris	MRZ-R18	Support	Not stated	Not stated.	Accept in part
SO191.27	Robert and Gill Norris			SO191.27	Robert and Gill Norris	MRZ-R19	Support	Not stated	Not stated.	Accept
SO191.28	Robert and Gill Norris			SO191.28	Robert and Gill Norris	MRZ-R20	Support	Not stated	Not stated.	Accept in part
SO191.29	Robert and Gill Norris			SO191.29	Robert and Gill Norris	MRZ-R21	Support	Not stated	Not stated.	Accept
SO191.30	Robert and Gill Norris			SO191.30	Robert and Gill Norris	MRZ-R23	Oppose	That good quality zinc coated cladding be exempt.	In Palmerston North the distance from the sea and the absence of heavy industry producing acidic effluents result in very low loss of zinc coating of unpainted cladding. Unlikely to result in significant risk.	Reject
SO191.31	Robert and Gill Norris			SO191.31	Robert and Gill Norris	MRZ-R24	Support	Not stated	Not stated.	Accept in part
SO191.32	Robert and Gill Norris			SO191.32	Robert and Gill Norris	MRZ-S1	Amend	Should not shade adjacent building's sun in winter between 9 am and 4pm	Unclear if proposal prevents excessive shading of adjacent buildings.	Reject
SO191.33	Robert and Gill Norris			SO191.33	Robert and Gill Norris	MRZ-S2	Amend	Should not shade adjacent building's sun in winter between 9 am and 4pm	Unclear if proposal prevents excessive shading of adjacent buildings.	Reject
SO191.34	Robert and Gill Norris			SO191.34	Robert and Gill Norris	MRZ-S3	Amend	Accessory buildings higher than 2 metres should be included	Shade, privacy, appearance.	Accept
SO191.35	Robert and Gill Norris			SO191.35	Robert and Gill Norris	MRZ-S4	Amend	Include all impermeable structures, covered or uncovered in the 50% maximum coverage requirement.	Uncovered impermeable decking and other impermeable structures reduce stormwater absorb on by soil.	Reject
SO191.36	Robert and Gill Norris			SO191.36	Robert and Gill Norris	MRZ-S5	Amend	Delete the requirement for growth to 4 metre height within 5 years. Express preference for deciduous trees or large shrubs (less shade in winter). Require avoidance of trees well known for entering water drainage systems or having large sub-surface roots.	Problems will include: Shade Leaf and flower drop in spouting and drains Damage to above-ground structures Root damage to underground structures including paving and drainage systems	Reject
SO191.37	Robert and Gill Norris			SO191.37	Robert and Gill Norris	MRZ-S14	Support	Not stated	Not stated.	Accept
SO191.38	Robert and Gill Norris			SO191.38	Robert and Gill Norris	MRZ-S15	Oppose	Delete sections a and b	It is possible to have a garage and front parking area designed such that all manoeuvring is easily done on-site such that vehicles can enter and leave the property forwards. This can be safer and also provide more off-street parking than requiring a smaller area.	Reject
SO191.39	Robert and Gill Norris			SO191.39	Robert and Gill Norris	MRZ-S18	Support	But why just 1 bike?	A family may well own several bikes.	Accept
SO191.40	Robert and Gill Norris			SO191.40	Robert and Gill Norris	MRZ-S19	Support	Not stated	Not stated.	Accept in part
SO191.41	Robert and Gill Norris			SO191.41	Robert and Gill Norris	MRZ-S20	Support	Strongly support clause 3	Improve pedestrian safety through better visibility of exiting vehicles.	Accept in part
SO191.42	Robert and Gill Norris			SO191.42	Robert and Gill Norris	MRZ-S21	Support	Not stated	Not stated.	Accept in part
SO192.1	Rex Voelkerling			SO192.1	Rex Voelkerling	Zone Extent	Oppose	Reconsider the boundaries.	Property was purchased under one set of laws and these are now changing.	Reject
SO192.2	Rex Voelkerling			SO192.2	Rex Voelkerling	MRZ-R7	Oppose	Delete	Concerns about loss of on-street parking availability and increase in overcrowding.	Reject
SO193.1	Sean Monaghan			SO193.1	Sean Monaghan	MRZ-S2	Oppose	Reduce height significantly	Concerns about loss of quality of life from increased noise, shading, and busy-ness.	Reject
SO194.1	Horizons Regional Council			SO194.1	Horizons Regional Council	General	Amend	Provide evidence that PCI will enable sufficient infill capacity in the long term to meet HBA development targets, including adjusting the spatial extent of the MRZ to provide more development capacity	PCI does not enable all the infill development capacity as identified in the HBA.	Accept in part
SO194.1	Horizons Regional Council	FS04.2	Arohanui Hospice Limited	SO194.1	Horizons Regional Council	General	Support	Allow	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.	Withdrawn

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO194.2	Horizons Regional Council			SO194.2	Horizons Regional Council	MRZ-O1	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept
SO194.3	Horizons Regional Council			SO194.3	Horizons Regional Council	MRZ-O2	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept in part
SO194.4	Horizons Regional Council			SO194.4	Horizons Regional Council	MRZ-O6	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept
SO194.5	Horizons Regional Council			SO194.5	Horizons Regional Council	MRZ-P1	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept
SO194.6	Horizons Regional Council			SO194.6	Horizons Regional Council	MRZ-P2	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept
SO194.7	Horizons Regional Council			SO194.7	Horizons Regional Council	MRZ-P3	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept in part
SO194.8	Horizons Regional Council			SO194.8	Horizons Regional Council	MRZ-P4	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept in part
SO194.9	Horizons Regional Council			SO194.9	Horizons Regional Council	MRZ-P5	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept
SO194.10	Horizons Regional Council			SO194.10	Horizons Regional Council	MRZ-P10	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept
SO194.11	Horizons Regional Council			SO194.11	Horizons Regional Council	MRZ-P13	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1, O3 - O5, RPS-UFD,P1, P2, P4-P6 and P8	Accept
SO194.12	Horizons Regional Council			SO194.12	Horizons Regional Council	MRZ-O3	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1 and P1, RPS-HAZ-NH-O1, P12 and P13	Accept
SO194.13	Horizons Regional Council			SO194.13	Horizons Regional Council	MRZ-O4	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1 and P1, RPS-HAZ-NH-O1, P12 and P13	Accept
SO194.14	Horizons Regional Council			SO194.14	Horizons Regional Council	MRZ-O5	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1 and P1, RPS-HAZ-NH-O1, P12 and P13	Accept
SO194.15	Horizons Regional Council			SO194.15	Horizons Regional Council	MRZ-P6	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1 and P1, RPS-HAZ-NH-O1, P12 and P13	Accept
SO194.16	Horizons Regional Council			SO194.16	Horizons Regional Council	MRZ-P7	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1 and P1, RPS-HAZ-NH-O1, P12 and P13	Accept in part
SO194.17	Horizons Regional Council			SO194.17	Horizons Regional Council	MRZ-P8	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O1 and P1, RPS-HAZ-NH-O1, P12 and P13	Accept
SO194.18	Horizons Regional Council			SO194.18	Horizons Regional Council	MRZ-O5	Support	Retain as notified	Aligns with One Plan provisions RPS-ETI O1 and P2	Accept
SO194.19	Horizons Regional Council			SO194.19	Horizons Regional Council	MRZ-P11	Support	Retain as notified	Aligns with One Plan provisions RPS-ETI O1 and P2	Accept in part
SO194.20	Horizons Regional Council			SO194.20	Horizons Regional Council	MRZ-P9	Support	Retain as notified	Aligns with One Plan provisions RPS-LF-FW-O3, O4, P4 and P12	Accept in part
SO194.21	Horizons Regional Council			SO194.21	Horizons Regional Council	MRZ-P10	Support	Retain as notified	Aligns with One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 and ETI-P5	Accept

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SO194.22	Horizons Regional Council			SO194.22	Horizons Regional Council	MRZ-P12	Support in part	Review MRZ-P12(b) to reflect "indigenous vegetation" is the preferred type of replacement vegetation	To align with NPS-IB Policy 14	Accept
SO194.23	Horizons Regional Council			SO194.23	Horizons Regional Council	SUB-MRZ-O1	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O1, O3, P1, P2, P4 and P5	Accept
SO194.24	Horizons Regional Council			SO194.24	Horizons Regional Council	SUB-MRZ-P1	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O1, O3, P1, P2, P4 and P5	Accept
SO194.25	Horizons Regional Council			SO194.25	Horizons Regional Council	SUB-MRZ-P2	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O1, O3, P1, P2, P4 and P5	Accept
SO194.26	Horizons Regional Council			SO194.26	Horizons Regional Council	SUB-MRZ-P5	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O1, O3, P1, P2, P4 and P5	Accept
SO194.27	Horizons Regional Council			SO194.27	Horizons Regional Council	SUB-MRZ-O1	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O5, P8, HAZ-NH-O2, P12 and P13	Accept
SO194.28	Horizons Regional Council			SO194.28	Horizons Regional Council	SUB-MRZ-P1	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O5, P8, HAZ-NH-O2, P12 and P13	Accept
SO194.29	Horizons Regional Council			SO194.29	Horizons Regional Council	SUB-MRZ-P3	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O5, P8, HAZ-NH-O2, P12 and P13	Accept
SO194.30	Horizons Regional Council			SO194.30	Horizons Regional Council	SUB-MRZ-P4	Support	Not stated	Aligns with One Plan provisions RPS-UFD-O5, P8, HAZ-NH-O2, P12 and P13	Accept
SO194.31	Horizons Regional Council			SO194.31	Horizons Regional Council	SUB-MRZ-P1	Support	Not stated	Aligns with One Plan provisions RPS-ETI-O2, P4 and P5	Accept
SO194.32	Horizons Regional Council			SO194.32	Horizons Regional Council	MRZ-R7	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Accept
SO194.33	Horizons Regional Council			SO194.33	Horizons Regional Council	MRZ-R8	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Accept
SO194.34	Horizons Regional Council			SO194.34	Horizons Regional Council	MRZ-R9	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO194.35	Horizons Regional Council			SO194.35	Horizons Regional Council	MRZ-R10	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Reject
SO194.36	Horizons Regional Council			SO194.36	Horizons Regional Council	MRZ-R11	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Reject
SO194.37	Horizons Regional Council			SO194.37	Horizons Regional Council	MRZ-R12	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Accept
SO194.38	Horizons Regional Council			SO194.38	Horizons Regional Council	MRZ-R13	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Accept
SO194.39	Horizons Regional Council			SO194.39	Horizons Regional Council	MRZ-R14	Oppose in part	Revise to ensure they give effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Accept
SO194.40	Horizons Regional Council			SO194.40	Horizons Regional Council	MRZ-R15	Oppose in part	Revise to ensure rule gives effect to MRZ-P10	The rule does not address MRZ-P10 and does not give effect to One Plan provisions RPS-UFD-O5, ETI-O2, UFD-P8 or ETI-P5	Accept
SO194.41	Horizons Regional Council			SO194.41	Horizons Regional Council	MRZ-R10	Support in part	Revise MRZ-R10.1 in accordance with the suggested amendments (in red) below (or similar) to align it with MRZ-P3, MRZ-P4, MRZ-PIO and MRZ-P12. MRZ-R10 -Construction, alteration or addition of buildings and structures within the Stormwater Overlay 1 Activity status. Restricted Discretionary Council's* discretion is restricted to. 1 The extent to which any stormwater effects, both on-site and off-site, are avoided or mitigated, 2 Whether the proposed mitigation measures can be effectively implemented and maintained, 3 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, and 4 The relevant matters in MRZ-P3, MRZ-P4 , MRZ-P6, MRZ-PI, MRZ-PB, MRZ-P10 and MRZ-P12 .	To give effect to policies MRZ-P3, P4, P10 and P12	Accept in part
SO194.42	Horizons Regional Council			SO194.42	Horizons Regional Council	MRZ-R23	Support	Retain as notified	Aligns with One Plan provision LF-FW-P12	Accept
SO194.43	Horizons Regional Council			SO194.43	Horizons Regional Council	MRZ-R24	Support	Retain as notified	Aligns with One Plan provision LF-FW-P12	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO194.44	Horizons Regional Council			SO194.44	Horizons Regional Council	Section 32 report	Neutral	The s32 evaluation should use both SSP2-4.5 and SSP5-8.5 climate adaptation scenarios	As required by the National Adaptation Plan	Reject
SO194.45	Horizons Regional Council			SO194.45	Horizons Regional Council	Section 32 report	Neutral	Retain as notified	The s32 evaluation is based on the pre-PC3 version of the One Plan RPS-UFD chapter	Accept
SO194.46	Horizons Regional Council			SO194.46	Horizons Regional Council	General	Neutral	Any proposed water extraction requiring consent should align with the reasonably and efficient use policies in the One Plan	Not stated.	Reject
SO194.47	Horizons Regional Council			SO194.47	Horizons Regional Council	General	Neutral	Additional caution is required when regulating land use and development in and around the Council's Drinking Water Protection Zones	Not stated.	Reject
SO195.1	Age-Friendly Palmerston North			SO195.1	Age-Friendly Palmerston North	Entire Plan Change	Neutral	Consider the needs of older people and people with mobility and accessibility needs, including in relation to building accessibility, building design, housing typology and parking requirements	Palmerston North's population is aging - in the next decade there will be more older people than children.. Objective 1 and Policy 1 in the NPS-UD apply to all people.	Reject
SO196.1	Ministry of Education Te Tāhuhu o Te Mātauranga			SO196.1	Ministry of Education Te Tāhuhu o Te Mātauranga	Definition - Education Facility	Support	Retain as notified	This term and definition is consistent with the requirements of the National Planning Standards 2019.	Accept
SO196.2	Ministry of Education Te Tāhuhu o Te Mātauranga			SO196.2	Ministry of Education Te Tāhuhu o Te Mātauranga	Definition - Additional Infrastructure	Amend	Add new definition <u>Additional Infrastructure means:</u> <u>a. public open space</u> <u>b. community infrastructure as defined in section 197 of the Local Government Act 2002</u> <u>c. land transport (as defined in the Land Transport Management Act 2003) that is not controlled by local authorities</u> <u>d. social infrastructure, such as schools and healthcare facilities</u> <u>e. a network operated for the purpose of telecommunications (as defined in section 5 of the Telecommunications Act 2001)</u> <u>f. a network operated for the purpose of transmitting or distributing electricity or gas</u>	This is a defined term in the NPS-UD. The term 'additional infrastructure' will provide clarity for the plan reader as to what types of activities are considered under this definition.	Reject
SO196.2	Ministry of Education Te Tāhuhu o Te Mātauranga	FS02.1	Crest Hospital Limited	SO196.2	Ministry of Education Te Tāhuhu o Te Mātauranga	Definition - Additional Infrastructure	Support	Allow	The amended definition will provide certainty and clarity as to what activities are considered to fall under the term Additional Infrastructure. Further, the amended definition will recognise that hospitals and healthcare facilities contribute to well-functioning urban environments and give effect	Reject
SO196.3	Ministry of Education Te Tāhuhu o Te Mātauranga			SO196.3	Ministry of Education Te Tāhuhu o Te Mātauranga	MRZ-O1	Support	Retain as notified	The Ministry is supportive of Objective MRZ-O1 as it encourages non-residential activities (which implies educational facilities) to be located within the MRZ, provided it meets certain tests as set out in the objective.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO196.4	Ministry of Education Te Tāhuhu o Te Mātauranga			SO196.4	Ministry of Education Te Tāhuhu o Te Mātauranga	MRZ-O2	Support in part	Amend MRZ-O2 Built development* in the Medium Density Residential Zone Built development* in the Medium Density Residential Zone positively contributes to achievement of a predominantly residential urban environment that: a. Comprises well-designed buildings, sites, streets, and neighbourhoods; b. Supports safe and secure environments that align with Crime Prevention through Environmental Design (CPTED) principles; c. Is characterised by an increased building density, a mix of building typologies, and building heights up to (and including) three storeys; d. Is adaptable and healthy; e. Provides a reasonable level of amenity for residents, adjoining residential properties and the street; f. Enables mode shift to public transport and active transport modes; g. Integrates with existing and planned infrastructure <u>including additional infrastructure</u> ; h. Connects with open space and the natural environment; i. Is resilient to the effects of climate change and natural hazards; and j. Is energy efficient	The Ministry requests that the term 'additional infrastructure' to be included in MRZ-O2(g) as built development, enabled by PCI, should also integrate with existing and planned additional infrastructure as well as infrastructure (as defined by the RMA). This change will signify that the MRZ is a suitable location for such facilities, along with the other 'additional infrastructure' activities listed in the definition and aligns with the purpose of the zone (as set out in MRZ-O1). It is important that at a strategic level that new development integrates with existing and planned additional infrastructure and that this is positioned at such a level.	Reject
SO196.4	Ministry of Education Te Tāhuhu o Te Mātauranga	FS02.2	Crest Hospital Limited	SO196.4	Ministry of Education Te Tāhuhu o Te Mātauranga	MRZ-O2	Support	Allow	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.	Reject
SO196.5	Ministry of Education Te Tāhuhu o Te Mātauranga			SO196.5	Ministry of Education Te Tāhuhu o Te Mātauranga	MRZ-P1	Support	Retain as notified	It encourages non-residential activities (which broadly includes educational facility) to be located within the MRZ.	Accept
SO196.6	Ministry of Education Te Tāhuhu o Te Mātauranga			SO196.6	Ministry of Education Te Tāhuhu o Te Mātauranga	MRZ-P5	Support	Retain as notified	It encourages non-residential activities (which implies, and broadly includes educational facility) where there is a benefit that supports the needs of the community and are commensurate with the purpose and planned built form of the MRZ.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO196.7	Ministry of Education Te Tāhuhu o Te Mātauranga			SO196.7	Ministry of Education Te Tāhuhu o Te Mātauranga	MRZ-R12	Support in part	Amend MRZ-R12 Educational facility (including kohanga reo* and kura kaupapa*) 1. Activity Status: Permitted Where: a. The educational facility has access* from a Minor Arterial or Collector Road, listed as such in 20.6.1.2 and 20.6.1.3; b. Any building used for educational purposes is offset from an adjacent residentially-used property by 6 metres; c. Building coverage must not exceed 40% of the site; b. Compliance with the following standards is achieved: i) MRZ-S1 – Maximum building height; ii) MRZ-S2 – Height in relation to boundary; iii) MRZ-S3 – Setbacks; iv) MRZ-S4 – Building coverage; v) MRZ-S9 – Permeable surfaces*; vi) MRZ-S10 – Stormwater attenuation device; vii) MRZ-S11 – Minimum floor levels; and ...	the Ministry requests that standards b. and c. of Rule MRZ-R12 are deleted as these standards are more stringent than what is afforded by the density standards under the Medium Density Residential Standards (MDRS). We request that compliance with MRZ-S3 and MRZ-S4 is provided instead for MRZ-R12 to align with the performance standards provided by the Council and the density standards of the MDRS.	Reject
SO197.1	Crest Hospital Limited			SO197.1	Crest Hospital Limited	Zone Extent	Oppose in part	Rezoning that part of 12 Carroll Street which is zoned Residential to Institutional zone. *Edit 14 March 2025 address is 21 not 12 Carroll Street	Rezoning to MRZ does not recognise the historic, current and ongoing use of the site for hospital or institutional purposes.	Accept
SO198.1	Brett Hill and Tom Santing			SO198.1	Brett Hill and Tom Santing	Entire Plan Change	Oppose	Not stated	Concerns about loss of property values, environmental and urban design issues, noise and privacy and pressure on infrastructure and amenities.	Reject
SO199.1	Kāinga Ora			SO199.1	Kāinga Ora	Stormwater Overlay	Oppose	Delete the overlay until all information is publicly available, fully assessed and further modelling is completed.	Stormwater mapping should be completed and reviewed prior to inclusion within the District Plan.	Reject
SO199.2	Kāinga Ora			SO199.2	Kāinga Ora	Zone Extent	Oppose	Use mapping provided by Kāinga Ora to determine the zone extent.	The current zone extent excludes properties owned by Kāinga Ora which are viable for intensification. Rezoning these areas as MDZ would assist in meeting the demand for social housing within the city and enable Kainga Ora to appropriately manage its housing portfolio.	Reject
SO199.3	Kāinga Ora			SO199.3	Kāinga Ora	Definitions	Support	Retain as notified	Kāinga Ora supports in full the changes to the definitions as informed by the national planning standards framework.	Accept in part
SO199.4	Kāinga Ora			SO199.4	Kāinga Ora	SUB-MRZ-O1	Support	Retain as notified	Kāinga Ora supports the inclusion of the proposed objective.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.5	Kāinga Ora			SO199.5	Kāinga Ora	SUB-MRZ-P1	Support in part	<p>Amendment sought:</p> <p>Provide for subdivision designs and layouts that make efficient use of renewable energy and other natural and physical resources, and deliver well-connected, resilient communities, including development* patterns that:</p> <p>1.Optimise solar gain; 2.Incorporate water sensitive design*; 3.Manage stormwater effectively and efficiently; 4.Support walking, cycling and public transport opportunities and enhance neighbourhood and network connectivity and safety 5.Result in safe and adequate access* from the transport network to each allotment; 6.Are adaptable to the effects of climate change; 7.Are designed using crime prevention through environmental design principles; 8.Achieve high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that contribute positively to an area's visual amenity; and 9.Orient lot frontages towards streets and other public spaces* to create quality streetscapes and where possible combine accessways to rear lots.</p>	<p>Kāinga Ora support in part the inclusion of the proposed policy, however the proposed policy includes matters that Kāinga Ora does not consider to be part of the general subdivision matters, particularly with regard to the urban design and landscaping outcomes, which should not form part of the consideration for standalone subdivision consents.</p> <p>Further there are no rules or standards relating to the proposed policy direction, which may impact upon Kāinga Ora development outcomes in the future.</p>	Reject
SO199.5	Kāinga Ora	FS03.1	Horizons Regional Council	SO199.5	Kāinga Ora	SUB-MRZ-P1	Oppose	Disallow	The relevant provisions give effect to OnePlan policy RPS-UFD-P8	Reject
SO199.6	Kāinga Ora			SO199.6	Kāinga Ora	SUB-MRZ-P2	Support in part	<p>Amendments sought:</p> <p>Provide for the efficient integration and layout of subdivision and associated development* by:</p> <p>1.Encouraging joint applications for subdivision and land use; 2. Enabling subdivision around development* that has already been lawfully established; and ...</p>	<p>Vacant lot subdivision has its merits in itself. Kāinga Ora also consider that clause 3 provides sufficient direction to ensure that when the allotment is further developed, that a complying dwelling can be constructed.</p>	Reject
SO199.7	Kāinga Ora			SO199.7	Kāinga Ora	SUB-MRZ-P3	Oppose in part	<p>Amend</p> <p>Take a risk-based approach to the subdivision of land affected by natural hazards so that new or exacerbation of existing natural hazards is avoided, <u>where practicable</u> and appropriate mitigation measures are <u>implemented during subdivision and development to manage the risks of the natural hazard. in place prior to development*.</u></p>	<p>Kāinga Ora support the inclusion of a policy in relation to subdivision of land affected by natural hazards and especially the risk based approach, however, consider that the use of the term 'avoid' essentially creates a prohibited activity which is considered inappropriate where the effects of the natural hazard could be managed</p>	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.8	Kāinga Ora			SO199.8	Kāinga Ora	SUB-MRZ-P4	Oppose	Relief sought: Delete this policy in its entirety. If the overlay is to be retained, Kāinga Ora then seeks the following amendments: Manage Avoid subdivision in the Stormwater Overlay <u>to mitigate adverse effects from stormwater runoff and flooding, including by the development and implementation of unless the Council* is satisfied</u> 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.the location, scale and nature of the development* proposed for the site;- 2.the extent of flood and/or overland stormwater flow hazards;- 3.the on-site and off-site effects of the proposed subdivision on people, property and the environment;- 4.recommended mitigation measures to remedy or mitigate the on- and off-site effects of the subdivision;- and— 5.demonstrates that the on- and off-site adverse effects associated with subdivision will appropriately be mitigated	Kāinga Ora, in the first instance seek that all provisions in relation to the Stormwater Overlay are deleted. If complete and appropriate evidence is provided to justify the Stormwater Overlay, then Kāinga Ora seek as consequential relief that in the MDZ, that the policy be amended to allow for a greater degree of engineering consultants to submit designs for approval. Kāinga Ora also oppose to having a policy which reads as a District Plan standard, noting that this policy should be more high level, rather than setting a list of requirements for meeting this policy. Kāinga Ora therefore seeks that clauses 1-5 are removed from the policy and shifted to either assessment criteria or methods.	Reject
SO199.8	Kāinga Ora	FS03.2	Horizons Regional Council	SO199.8	Kāinga Ora	SUB-MRZ-P4	Oppose	Disallow	Horizons recognizes that PC I 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	Accept
SO199.9	Kāinga Ora			SO199.9	Kāinga Ora	SUB-MRZ-P5	Support	Retain as notified	Kāinga Ora support the inclusion of a policy in the subdivision chapter in relation to servicing.	Accept
SO199.10	Kāinga Ora			SO199.10	Kāinga Ora	SUB-MRZ-R1	Support in part	Amendment sought: 1.Activity status: Controlled Where: a. Where the site is not located within the Stormwater Overlay; and An application under this rule is precluded from being publicly notified or limited notified in accordance with section 95A or section 95B of the Resource Management Act 1991 where the subdivision is associated with residential units or papakāinga* that are permitted under MRZ-R7 <u>or restricted discretionary under MRZ-R8.</u> An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991 if the subdivision is associated with an application for the construction of 1-3 residential units or papakāinga* that do not comply with MRZ-R7 <u>or is a restricted discretionary activity under MRZ-R8.</u>	Kāinga Ora support the inclusion of a controlled activity status for subdivision where the relevant performance standards are met. Kāinga Ora support the inclusion of notification preclusions under this rule, however consistent with other relief sought in this submission, seek that an application under Rule MRZ-R8 also be precluded from public notification. This is consistent with the relief sought with the notification clause within MRZ-R8.	Reject
SO199.11	Kāinga Ora			SO199.11	Kāinga Ora	SUB-MRZ-R1	Oppose	Delete the rule in its entirety. If the overlay is to be retained, Kāinga Ora then seeks the following amendments: Notification An application under this rule is precluded from being publicly public and limited notified notification in accordance with section 95A <u>and 95B</u> of the Resource Management Act <u>1991.</u>	Consistent with the relief sought, Kāinga Ora seek that provisions associated with the Stormwater Overlay are deleted. If complete and appropriate evidence is provided to justify the Stormwater Overlay, then Kāinga Ora seek that an application under this rule also be exempt from limited and public notification. Kāinga Ora does not consider limited notification a helpful procedure to be able to mitigate or assess any such infringements which are technical in nature with a range of mitigation options available.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.12	Kāinga Ora			SO199.12	Kāinga Ora	SUB-MRZ-R1	Oppose Notification: An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991. An application under this rule is precluded from being limited notified in accordance with section 95B of the Resource Management Act 1991 except in relation to the width of a site access* and earthworks.	Kāinga Ora does not consider limited notification a helpful procedure to be able to mitigate or assess any such infringements which are technical in nature with a range of mitigation options available.	Reject
SO199.13	Kāinga Ora			SO199.13	Kāinga Ora	SUB-MRZ-S1	Support in part	Amendments sought: Each allotment must have practical, physical and legal access* to a public road by way of either: a. an access leg* at least 3 metres wide forming part of the lot; or b. a shared access* consisting of up to six access strips* lying adjacent to one another and giving access* to no more than five other lots , and in respect of which reciprocal rights-of way are granted or reserved; or c. an access strip* held in common ownership with the allotment and up to five other allotments ; or d. any right-of-way running with and appurtenant to the land in which the allotment is comprised	Kāinga Ora support the proposed standard, however, consider that limiting shared access for up to 5 dwellings is too low given that the effects can easily be managed through widths and pedestrian access through the Land Transport Chapter.	Accept
SO199.14	Kāinga Ora			SO199.14	Kāinga Ora	SUB-MRZ-S2	Support in part	Move rule to the land transport chapter of the district plan.	Kāinga Ora support the inclusion of a standard in relation to vehicle crossings for medium density development, however, seek that this rule is moved to the land transport chapter of the District Plan as opposed to repeated in the Subdivision and Medium Density Residential Zone Chapters.	Reject
SO199.15	Kāinga Ora			SO199.15	Kāinga Ora	MRZ-O1	Support	Retain as notified	Kāinga Ora support the general intent stated through this objective, particularly the identification of the need to provide a range of housing options (particularly papakāinga) in locations that meet the demand as well as the needs of the community	Accept
SO199.16	Kāinga Ora			SO199.16	Kāinga Ora	MRZ-O2	Oppose in part	Amendments sought: Built development* in the Medium Density Residential Zone positively contributes to achievement of a predominantly residential urban environment that supports Medium Density living, that:- a) Comprises well-designed buildings, sites, streets, and neighbourhoods;- b) Supports safe and secure environments that align with Crime-Prevention through Environmental Design (CPTED) principles;- c) Is characterised by an increased building density, a mix of building typologies, and building heights up to (and including) three storeys;- d) Is adaptable and healthy;- e) Provides a reasonable level of amenity for residents, adjoining residential properties and the street;- f) Enables mode shift to public transport and active transport modes;- g) Integrates with existing and planned infrastructure;- h) Connects with open space and the natural environment;- i) Is resilient to the effects of climate change and natural hazards; and j) Is energy efficient	Kāinga Ora consider that this Objective should be simplified. The subsequent clauses are more appropriate as a policy. See amendments sought to MDZ-P3 below.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.17	Kāinga Ora			SO199.17	Kāinga Ora	MRZ-O4	Support in part	Amendment sought: Avoid residential intensification ensures that unless the on-site and off-site effects of flooding (including from stormwater) on people, property and the environment as a result of residential intensification are appropriately mitigated managed.	Kāinga Ora generally support the inclusion of an objective which seeks to limit the impact of development on flooding. Kāinga Ora would however seek that the word 'avoid' is removed from the objective as this would imply a prohibited activity status.	Reject
SO199.18	Kāinga Ora			SO199.18	Kāinga Ora	MRZ-O6	Support	Retain as notified	Kāinga Ora support the inclusion of this policy as it relates to supporting Mana Whenua and especially the provision of papakāinga in the MDZ.	Accept
SO199.19	Kāinga Ora			SO199.19	Kāinga Ora	MRZ-P3	Oppose	Amendments Sought: Residential buildings and structures, including papakāinga*, are compatible with the planned built form of the Zone when: 1. Site layouts are coherently planned and the layout responds to the characteristics of the site and context, including adjacent waterways and public open space*; 2. Site layouts provide a good level of pedestrian access and amenity and achieve legible, visually attractive access* to the development*; 3. Residential units have appropriately sized and located private outdoor living space with a reasonable level of privacy and sunlight; 4. Building designs and site layouts provide a reasonable level of privacy and access to sunlight for residential units on the site and for those on neighbouring sites; 5. Development* frontages provide a legible connection to the street through orientation, entrance location, fencing and glazing, and they are not dominated by garages; 6. Developments* integrate landscaping with building and access* design; 7. They provide visual interest through the modulation and articulation of façades and roof forms. <u>1. Comprises well-designed buildings, sites, streets, and neighbourhoods;</u> <u>2. Supports safe and secure environments that align with Crime Prevention through Environmental Design (CPTED) principles;</u> <u>3. Is characterised by an increased building density, a mix of building typologies, and building heights generally up to (and including) three storeys;</u> <u>4. Provides a reasonable level of amenity for residents, adjoining residential properties and the street;</u> <u>5. Supports mode shift to public transport and active transport modes;</u> <u>6. Integrates with existing and planned infrastructure;</u> <u>7. Connects with open space and the natural environment; and</u> <u>8. Is resilient to the effects of climate change and natural hazards</u>	The proposal will introduce urban design and landscaping rules within the policies which will constrain proposed intensification that would otherwise be acceptable. Further this policy will could create an instance where minor non compliances with district plan standards will be subject to greater degrees of urban design scrutiny through a s.104 assessment. Kāinga Ora also oppose the inclusion of a policy which reads as a rule assessment, particularly for some matters which are subject to individual interpretation.	Reject
SO199.20	Kāinga Ora			SO199.20	Kāinga Ora	MRZ-P4	Support in part	Amendment sought: Move policy to the Land Transport Chapter or alternatively amend existing policies within that chapter to support MDZ development.	Kāinga Ora support the inclusion of this policy within the District Plan, however, consider this would be more appropriate as either a policy in the land transport chapter of the district plan.	Reject
SO199.21	Kāinga Ora			SO199.21	Kāinga Ora	MRZ-P6	Support	Retain as notified	Kāinga Ora support the inclusion of a stormwater policy.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.22	Kāinga Ora			SO199.22	Kāinga Ora	MRZ-P7	Oppose	Delete the policy. Or if the Stormwater Overlay is to be retained, then the following amendments sought: Manage Avoid -subdivision in the Stormwater Overlay <u>to mitigate adverse effects from stormwater runoff and flooding, including by the development and implementation of</u> unless the Council ² is satisfied that a site-specific stormwater management plan prepared by a suitably-qualified stormwater design consultant (preferably with experience in water sensitive design² concepts and elements) identifies:	If fulsome and complete evidence is provided to support the Stormwater Overlay, then Kāinga Ora generally seek that the reference to an individual's qualifications are removed from the proposed wording as this is considered too restrictive.	Reject
SO199.22	Kāinga Ora	FS03.3	Horizons Regional Council	SO199.22	Kāinga Ora	MRZ-P7	Oppose	Disallow	Horizons recognizes that P-O 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.	Accept
SO199.23	Kāinga Ora			SO199.23	Kāinga Ora	MRZ-P10	Oppose	Delete	This policy is not supported by any rules or standards.	Reject
SO199.23	Kāinga Ora	FS03.4	Horizons Regional Council	SO199.23	Kāinga Ora	MRZ-P10	Oppose	Retain provisions	MRZ-PIO gives effect to Horizons' One Plan provision RPS-UFD-P8 (2)(b)	Accept
SO199.24	Kāinga Ora			SO199.24	Kāinga Ora	MRZ-P11	Oppose in part	Amendment Sought: Manage the effects on new or altered buildings and noise sensitive activities* near existing infrastructure, including by requiring: 1. Appropriate setbacks and design controls where necessary to achieve appropriate protection of infrastructure and mitigation of effects on adjacent noise sensitive activities*. 2. All future buildings, earthworks and construction activities maintain safe electrical clearance distances in compliance with the New Zealand Electrical Code of Practice for electrical safe distances (NZECP 34:2001).	Kāinga Ora also consider that the Proposed MDZ policies should not state NZECP standards and seek that reference to this standard is deleted.	Reject
SO199.25	Kāinga Ora			SO199.25	Kāinga Ora	MRZ-P12	Oppose	Amendment sought: Encourage the retention and incorporation of existing vegetation into the required landscaped areas <u>where possible, considering the amenity provided, health and practical location of existing vegetation within the site.</u> Encourage replacement planting to: a. Be of equal or better quality in terms of species, form, scale and texture; b. Use locally sourced species <u>where possible</u>	Kāinga Ora support the general principle of retaining vegetation to prevent loss, however this policy gives weight to the retention of vegetation, whilst working around existing vegetation during construction introduces increased costs and difficulties to developments. Further, this policy provides scope to introduce pseudo- protected tree status. In addition, requiring locally sourced species is often not possible due to lack of supply, especially on larger projects.	Accept in part
SO199.26	Kāinga Ora			SO199.26	Kāinga Ora	MRZ-R7	Support	Retain as notified	Kāinga Ora supports this rule	Accept in part
SO199.27	Kāinga Ora			SO199.27	Kāinga Ora	MRZ-R10	Oppose	Delete	Kāinga Ora seek the deletion of all provisions relating to the Stormwater Overlay until such time that complete and fulsome evidence is provided to support the Stormwater Overlay.	Reject
SO199.28	Kāinga Ora			SO199.28	Kāinga Ora	MRZ-R13	Support	Retain as notified	Kāinga Ora support the permitted activity status for Community Houses.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.29	Kāinga Ora			SO199.29	Kāinga Ora	MRZ-R24	Oppose	Delete	The threshold of 4 carparking spaces is too low. Stormwater treatment matters should be included as a matter of discretion within Rule MRZ-R8. Further, this rule should be located within the Land Transport Chapter and be based on an area and not the number of carparks.	Accept in part
SO199.30	Kāinga Ora			SO199.30	Kāinga Ora	MRZ-S1	Support	Retain as notified	Kāinga Ora supports this rule	Accept in part
SO199.31	Kāinga Ora			SO199.31	Kāinga Ora	MRZ-S2	Oppose in part	Seek that the existing standard be replaced with 1. Buildings must not project beyond a 45° recession plane measured from a point 5 metres vertically above ground level along all boundaries. Where the boundary forms part of a legal right of way, entrance strip, access site, or pedestrian access way, the height in relation to boundary applies from the farthest boundary of that legal right of way, entrance strip, access site, or pedestrian access way....	Kāinga Ora opposes this standard and seeks a comprehensive review in order to better provide for flexibility in built form/residential typologies while still managing the potential for adverse effects to adjoining properties.	Reject
SO199.32	Kāinga Ora			SO199.32	Kāinga Ora	MRZ-S3	Support in part	Amendment Sought: 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.	Kāinga Ora supports the proposed standard for setbacks, however, seek the deletion of shading effects and loss of privacy effects as matters of discretion as these are best considered for HIRB and Outlook Space standard infringements.	Accept in part
SO199.33	Kāinga Ora			SO199.33	Kāinga Ora	MRZ-S4	Support in part	Amendment sought: 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.	Kāinga Ora supports the proposed standard for maximum building coverage, however, seeks the deletion of shading effects and loss of privacy effects as matters of discretion as these are best considered for HIRB and Outlook Space standard infringements.	Reject
SO199.34	Kāinga Ora			SO199.34	Kāinga Ora	MRZ-S5	Oppose in part	Amendment sought 1. A ground floor residential unit, papakāinga* or community house* must have a landscaped area of grass and/or plants covering at least 20% of the site; 2. Where a site fronts a public road, at least 30% of the required landscaped area must be located in the front yard, for a depth of at least 1m;- 3. At least one specimen tree capable of growing to a minimum height of four metres after five years must be provided for each ground floor residential unit, papakāinga* or community house*.- 4. The specimen tree must be located in the outdoor living space required by MRZ-S7(2) where this is provided at the street frontage of a residential unit, papakāinga* or community house*.- Matters of discretion if the standard is infringed: 1. Effect of increased hard standing on visual amenity; 2. The contribution of landscaping to visual interest; and- 3. Integration of landscaping and building and access* design.-	Kāinga Ora support the introduction of a standard which requires that a percentage of the site be landscaped, however, consider that the additional requirements proposed in relation to specimen tree planting and front lot landscaping will introduce additional costs to development, particularly in regard to landscape design and will create additional layers of approval. Kāinga Ora consider that a blanket 20% will provide for adequate levels of vegetation per site.	Reject
SO199.35	Kāinga Ora			SO199.35	Kāinga Ora	MRZ-S6	Oppose	Delete	Kāinga Ora oppose the inclusion of a shade provision and considers that the occupier of a residence should be able to choose where and how such shade could be provided and located i.e. the use of a moveable outdoor umbrella when desired. Kāinga Ora is uncertain how this rule would be monitored for compliance and any consent notices etc would be too onerous.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.36	Kāinga Ora			SO199.36	Kāinga Ora	MRZ-S8	Oppose in part	Amendment sought: 1.An outlook space must be provided for every residential unit, papakāinga* or community house* which meets the following minimum dimensions (measured from the centre point of the applicable window): a. 6.4 metres in depth x 4 metres in width outlook space for a main living area; and b. 3 metres in depth x 3 metres in width outlook space for the primary bedroom; and c. 1 metre in depth x 1 metre in width outlook space for all other habitable rooms.	Kāinga Ora support the inclusion of an outlook space standard within the proposed medium density zone, however, seek that the outlook space for the main living room is reduced to a 4x4m dimension to be consistent with the outdoor living requirements. Kāinga Ora also seek the deletion of an outlook space from the primary bedroom as this constrains viable locations of the primary bedroom against side boundaries which require a setback of 1m.	Reject
SO199.37	Kāinga Ora			SO199.37	Kāinga Ora	MRZ-S10	Support in part	Amendment sought: Delete Clause 3 of the rule, or alternatively amend as follows: 1. Every site must include a stormwater attenuation device which is sized to contain a minimum 18 litres of water per 1m2 of new impervious area. 2. Each stormwater attenuation device must be maintained on an ongoing basis. 3. Any above-ground stormwater attenuation tank must be located in a side or rear yard that is not located within a side or rear yard must be screened.	Kāinga Ora support the inclusion of a Stormwater attenuation device standard within the proposed MDZ, however seek that the location of tanks not be subject to a performance standard.	Reject
SO199.38	Kāinga Ora			SO199.38	Kāinga Ora	MRZ-S11	Support	Retain as notified	Kāinga Ora supports this standard	Accept in part
SO199.39	Kāinga Ora			SO199.39	Kāinga Ora	MRZ-S13	Oppose	Delete	Kāinga Ora consider that the location of the door does not impact upon the neighbourhood, street amenity or public and as such should not be a standard under the district plan. The glazing requirements within MRZ-S12 are considered appropriate to provide for street frontage engagement.	Reject
SO199.40	Kāinga Ora			SO199.40	Kāinga Ora	MRZ-S15	Support in part	Retain wording as notified, add relevant standards to Section 20: Land Transport as opposed to the MRZ standards for consistency.	Kāinga Ora support the inclusion of the proposed standards for onsite carparking, onsite manoeuvring and vehicle crossings, however consistent with relief sought elsewhere consider that these should be within Section 20: Land Transport of the District Plan so as to not duplicate matters in the District Plan.	Accept in part
SO199.41	Kāinga Ora			SO199.41	Kāinga Ora	MRZ-S16	Support in part	Retain wording as notified, add relevant standards to Section 20: Land Transport as opposed to the MRZ standards for consistency.	Kāinga Ora support the inclusion of the proposed standards for onsite carparking, onsite manoeuvring and vehicle crossings, however consistent with relief sought elsewhere consider that these should be within Section 20: Land Transport of the District Plan so as to not duplicate matters in the District Plan.	Accept in part
SO199.42	Kāinga Ora			SO199.42	Kāinga Ora	MRZ-S17	Support in part	Retain wording as notified, add relevant standards to Section 20: Land Transport as opposed to the MRZ standards for consistency.	Kāinga Ora support the inclusion of the proposed standards for onsite carparking, onsite manoeuvring and vehicle crossings, however consistent with relief sought elsewhere consider that these should be within Section 20: Land Transport of the District Plan so as to not duplicate matters in the District Plan.	Reject
SO199.43	Kāinga Ora			SO199.43	Kāinga Ora	MRZ-S18	Oppose in part	Amendments sought: 1. Bicycle parking must be provided for all residential units at a rate of 1 bicycle park per residential unit; 2. Bicycle parking must be provided either within each residential unit or within a secure structure (which may be communal, <u>within a garage or within a residential unit which has direct ground floor access</u>);	Kāinga Ora seek that bicycle parking should also be able to be included within the dwelling unit if ground floor access is provided.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO199.44	Kāinga Ora			SO199.44	Kāinga Ora	MRZ-S19	Support in part	Amendment sought: 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. 2. Communal rubbish storage areas must be screen or located so as not to be visible from a public road 3. 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.	Kāinga support the inclusion of the proposed standard for onsite rubbish storage and collection, however seek that matter 2 is deleted as no matters of discretion relate to onsite amenity.	Reject
SO199.45	Kāinga Ora			SO199.45	Kāinga Ora	MRZ-S20	Support	Retain as notified	Kāinga Ora support the inclusion of the proposed standard for fences and standalone walls.	Accept in part
SO199.46	Kāinga Ora			SO199.46	Kāinga Ora	MRZ-S21	Oppose in part	Move this standard to the General Chapter and include a note that states that this standard is only applicable to MRZ-R20 and MRZ-R22. Confirm that the 'grille and diffuser' are external components to the dwelling only.	Kāinga Ora seek that this rule is relocated to the General Rules Chapter. In addition to this relief sought, this standard should only apply to mechanical ventilation required for MTZ-R20 and MRZ-R22. Noise related to any other mechanical ventilation (domestic heat pumps etc) is adequately considered within the Noise Chapter. Kāinga Ora is also uncertain whether grille or diffuser are the internal components to the system.	Reject
SO199.47	Kāinga Ora			SO199.47	Kāinga Ora	Chapter 10	Oppose	Retain existing wording in introduction	Kāinga Ora oppose the deletion of wording in relation to intensification in the introductory chapter of the General Residential Zone. Whilst the MDZ will enable increased levels of intensification, this should not prevent intensification to appropriate levels within the GRZ.	Reject
SO200.1	Paul Robertson			SO200.1	Paul Robertson	MRZ-S2	Support	Retain as notified	The height in relation to boundary as proposed seems fair and reasonable to me, but only on certain sites.	Accept in part
SO201.1	Jonathan and Jill Hogg			SO201.1	Jonathan and Jill Hogg	Entire Plan Change	Oppose	Rethink the impact of development on infrastructure, loss of privacy and loss of greenspace.	Concerns about reduced section sizes, increased impermeable surfaces, lack of neighbour consent for taller buildings, loss of privacy, increase in noise, increased on-street parking	Reject
SO202.1	New Zealand Defence Force			SO202.1	New Zealand Defence Force	R10.7.1.9 and R10.7.4.10	Support	Retain application to the MRZ	TMTA can include a range of activities, from office/classroom-based activities to large scale military exercises, and might involve search and rescue operations, infrastructure support, bomb deactivation training, small construction tasks, weapons firing, personnel movement etc. It is appropriate to provide for minor TMTA as a permitted activity in these zones consistent with the current District Plan approach.	Accept
SO202.2	New Zealand Defence Force			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.	Reject
SO202.2	New Zealand Defence Force	FS06.42	Kāinga Ora	SO202.2	New Zealand Defence Force	MRZ-O5	Oppose	Disallow	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.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO202.3	New Zealand Defence Force			SO202.3	New Zealand Defence Force	MRZ-P11	Amend	<p>MRZ-P11 Effects on of buildings and activities near infrastructure and physical resources of regional or national importance.</p> <p>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:</p> <ol style="list-style-type: none"> 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. All future buildings, earthworks and construction activities.... 	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.	Accept in part
SO202.3	New Zealand Defence Force	FS06.43	Kāinga Ora	SO202.3	New Zealand Defence Force	MRZ-P11	Oppose	Disallow	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	Accept in part
SO203.1	Enviro NZ			SO203.1	Enviro NZ	Chapter 5.4(c)	Support in part	Include Waste storage in the list of information that must be provided with an application.	If there is a proposed standard for rubbish storage and collection then development plans need to show the location of the storage and access to the storage. The location of waste storage is not often thought about when providing plans for resource consent. If the space allocated for waste management (rubbish) is not designed at the outset, this can generate adverse effects on amenity and the health and safety of residents, road corridor users and collection staff. Assessment of multi-unit dwellings needs to include the space and location allocated for waste storage bins and their access to and from the street.	Accept
SO203.2	Enviro NZ			SO203.2	Enviro NZ	R10.6.3.3	Support in part	<p>Add waste management to the matters of discretion and add the Rubbish Storage and Collection standard to the Performance Standards.</p> <p>Add amendment to assessment criteria 4(i) (i) <u>Sufficient</u>. Suitably screened and <u>an accessible location provision is made</u> for rubbish storage and collection</p>	If these specific areas in the Residential chapter have a density minimum of 150 ² per dwelling, then all the urban design elements, including waste management, need careful planning to avoid poor functionality and future cost to residents. Given the recognition for the need of a waste management standard in the Medium Density Zone it seems that those higher density areas remaining under the remit of the Residential zone should also be required to design suitable waste management areas.	Reject
SO203.3	Enviro NZ			SO203.3	Enviro NZ	Chapter 10A Introduction	Support in part	Include reference to incorporating space for waste and waste recycling	This introductory paragraph leaves out the necessity of having appropriate waste storage facilities on site which impacts directly on greenhouse gas emissions. Without sufficient storage on site to separate refuse, waste minimisation targets cannot be achieved as organic waste and recyclables are landfilled, contributing to the city's greenhouse gas emissions profile. Appropriate waste storage facilities are also essential to minimise the adverse health impacts of badly stored refuse as an increasing warm climate leads to greater bacterial production with associated potential disease and odour effects.	Accept
SO203.4	Enviro NZ			SO203.4	Enviro NZ	MRZ-O2	Support in part	<p>...</p> <p>f. Enables mode shift to public transport and active transport modes;</p> <p>g. Integrates with existing and planned infrastructure, <u>including waste storage and collection</u>;</p> <p>h. Connects with open space and the natural environment;</p> <p>...</p>	Waste is often the 'forgotten' infrastructure and the proposed amendment allows waste storage and collection to be considered as essential infrastructure in the design of higher density residential developments. Without consideration of waste storage and collection in the design of residential neighbourhoods, the quality and functionality of the neighbourhoods are affected through poor outdoor amenity, hygiene, safety for residents and pedestrians, and operational difficulties for waste collectors.	Reject

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO203.5	Enviro NZ			SO203.5	Enviro NZ	MRZ-P3	Support in part	... 7.They provide visual interest through the modulation and articulation of façades and roof forms. <u>8.Site layouts incorporate sufficient, screened rubbish storage areas that allow for waste separation and accessible and safe collection.</u> ...	Waste is often the 'forgotten' infrastructure and the proposed amendment allows waste storage and collection to be considered as essential infrastructure in the design of higher density residential developments. Without consideration of waste storage and collection in the design of residential neighbourhoods, the quality and functionality of the neighbourhoods are affected through poor outdoor amenity, hygiene, safety for residents and pedestrians, and operational difficulties for waste collectors.	Accept in part
SO203.6	Enviro NZ			SO203.6	Enviro NZ	MRZ-P4	Support in part	Amend Enable residential activities and buildings when: 1. The safety and efficiency of the land transport network is maintained, including by providing for safe vehicle turning and manoeuvring where off street parking is provided <u>and safe kerbside waste collection;</u>	Intensive residential developments can create a proliferation of individual bins on the roadside which creates obstructions and safety hazards. Monitoring in Auckland has found this is a common occurrence where bin collection is not considered at the design and resource consent stages. Without the proposed amendment there will be little provision to require on-site bin or waste collection if the kerb space is inadequate or unsuitable.	Reject
SO203.7	Enviro NZ			SO203.7	Enviro NZ	MRZ-R11	Support in part	Add requirement to comply with MRZ-S19	Accessory buildings, even with complying with coverage, can have the potential to alter and dislocate the areas needed for waste storage and collection. Ensuring that any new accessory buildings and/or additions continue to cater for the waste storage areas will ensure that this essential infrastructure continues to operate efficiently and effectively without adverse effects.	Reject
SO203.8	Enviro NZ			SO203.8	Enviro NZ	MRZ-R14	Support in part	Add requirement to R14.1 comply with MRZ-S19	Visitor accommodation usually has on-site rubbish collection and therefore those parts of the on-site rubbish storage and collection standard that refer to on-site collection should apply. This will ensure that visitor accommodation is designed to meet the minimum standards for this storage.	Reject
SO203.9	Enviro NZ			SO203.9	Enviro NZ	MRZ-S19	Support in part	1.Each residential unit must have access to a screened rubbish storage area <u>which is sized to accommodate one 240l wheeled bin and one recycling crate with a minimum area of 1.5m2 and a minimum dimension of 1 metre in any direction, except:</u> <u>2.a. where</u> Communal rubbish storage areas are provided. <u>2.The location of any storage area</u> must be screened or located so as not to be visible from a public road <u>and/or adjacent sites, and must not encroach into driveways, manoeuvring areas, parking and outdoor living spaces.</u> <u>3.Bins must be accessible for residents to get to the kerb.</u> <u>4.Where kerbside collection is employed, a kerbside space of 1m per dwelling is available without impeding the public footpath.</u> <u>5.Where on-site waste collection is used:</u> <u>a. the space must be accessible for the collection vehicle.</u> <u>b.where</u> 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 <u>3.Accessibility, odour and noise effects of rubbish storage location.</u> 4.Location and size of rubbish storage area.	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.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO203.9	Enviro NZ	FS06.44	Kāinga Ora	SO203.9	Enviro NZ	MRZ-S19	Oppose in part	Disallow 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.	Accept
SO203.10	Enviro NZ			SO203.10	Enviro NZ	SUB-MRZ-P1	Support in part	Add "including safe waste kerbside collection" to point 4.	There is a cumulative impact of multi-unit developments requiring space on the streets for kerbside collection. This needs to be managed at the subdivision stage for street design so that safe kerbside rubbish collection can be achieved. Accidents with cars, pedestrians and particularly cyclists on poorly designed roads occur when waste collection has not been considered.	Accept in part
SO204.1	Arohanui Hospice Ltd			SO204.1	Arohanui Hospice Ltd	Zone Extent	Amend	Rezone 1 and 11 Heretaunga Street and 758 - 766 Tremaine Avenue as MRZ.	A Medium Density Residential zoning on the site will allow for flexibility for future development given the site is well connected to public transport networks, within the walkable catchment for employment opportunities, schools and retails and in close proximity to open space and recreation opportunities. In addition, the site provides an ideal opportunity for increase housing supply.	Withdrawn
SO204.2	Arohanui Hospice Ltd			SO204.2	Arohanui Hospice Ltd	MRZ-R17	Amend	Include a new rule which makes a retirement village or residential centre an RDA activity on the Arohanui Hospice site. *Edit 14 March 2025. The summary of submissions appears to indicate that it relates only to the Arohanui Hospice site. Arohanui Hospice propose that this new rule is applicable to the entire Medium Density Zone.	Providing for these activities as a Restricted Discretionary Activity in the MRZ generally or more specifically on the submission site would signal a more enabling pathway for these activities and would be consistent with the purpose of the MRZ.	Withdrawn
SO205.1	Ben Foster			SO205.1	Ben Foster	Entire Plan Change	Support	Retain as notified	they will enable greater choice for developments near community / suburb centres.	Accept
SO206.1	John Ireland			SO206.1	John Ireland	MRZ-S2	Amend	Open the application for directly affected neighbours comments, suggestions and objections. This should be mandatory.	Negative impacts on neighbours. Having a 5 metre boundary fence with a 45 degree pitch on the multi-story building leading to a total height of 11 metres will create shading issues that should be sorted out before any project starts.	Reject
SO207.1	Mary Pattie			SO207.1	Mary Pattie	Zone Extent	Oppose	Delete the MRZ around Buick Crescent, Awapuni.	Delete this change within my residential area, as this will spoil what has been a very desirable location to live in.	Reject
SO207.2	Mary Pattie			SO207.2	Mary Pattie	MRZ-S1	Oppose	Delete	These heights are too high. This would negatively impact on living in what is a nice quiet part of town. Also you might be placing people in danger with the potential of flooding which does occur from time to time in this part of town.	Reject
SO208.1	Development Nous			SO208.1	Development Nous	Zone Extent	Amend	Include 567 and 567A Featherston Street in the zone	The sites meet the location requirements and are aligned with the plan change.	Reject
SO209.1	NZ Transport Agency Waka Kotahi			SO209.1	NZ Transport Agency Waka Kotahi	MRZ-O5	Support	Retain as notified	NZTA supports the inclusion of objectives and policies to achieve appropriate mitigation for reverse sensitivity effects for noise sensitive activities adjacent to State Highway 3	Accept
SO209.2	NZ Transport Agency Waka Kotahi			SO209.2	NZ Transport Agency Waka Kotahi	MRZ-P11	Support	Retain as notified	NZTA supports the inclusion of objectives and policies to achieve appropriate mitigation for reverse sensitivity effects for noise sensitive activities adjacent to State Highway 3	Accept in part
SO209.3	NZ Transport Agency Waka Kotahi			SO209.3	NZ Transport Agency Waka Kotahi	MRZ-R20	Support	Retain as notified	The proposed rule provides certainty that adverse effects on noise sensitive activities adjacent to state highway 3 will be mitigated.	Accept in part
SO210.1	Natural Hazards Commission Toka Tū Ake			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.	Accept in part
SO210.1	Natural Hazards Commission Toka Tū Ake	FS06.45	Kāinga Ora	SO210.1	Natural Hazards Commission Toka Tū Ake	New rule	Oppose in part	Disallow 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'.	Accept

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO210.2	Natural Hazards Commission Toka Tū Ake			SO210.2	Natural Hazards Commission Toka Tū Ake	MRZ-O2	Support	Retain as notified	We support that residential urban environments should be resilient to the effects of climate change and natural hazards.	Accept in part
SO210.3	Natural Hazards Commission Toka Tū Ake			SO210.3	Natural Hazards Commission Toka Tū Ake	MRZ-O4	Amend	That the following amendments are made: 1. A definition or explanation for what the council deems as "appropriately mitigated" for flooding is included. 2. That "appropriately mitigated" is assessed using the following criteria: <u>a) The effectiveness of any proposed natural hazard mitigation works and the alternative design options considered, including low impact design.</u> <u>b) Any adverse effects on the environment of any proposed mitigation measures.</u> <u>c) The extent to which the mitigation works transfer, or create, unacceptable hazard risk to other people, property or infrastructure.</u> <u>d) The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site.</u> <u>e) Whether or not the work would be carried out under the supervision of either a Chartered Professional Engineer with experience in geotechnical engineering or a Professional Engineering Geologist (IPENZ registered).</u>	It is important to clarify what level of mitigation is required for the council to deem the effects of flooding "appropriately mitigated". Providing a definition or explanation is necessary to avoid confusion and ensure consistent application of rules and policies.	Accept in part
SO210.4	Natural Hazards Commission Toka Tū Ake			SO210.4	Natural Hazards Commission Toka Tū Ake	MRZ-P6	Support	Retain as notified	We support the use of on-site mitigation measures for subdivision to manage flooding. Permeable surfaces, stormwater attenuation, minimum floor levels, and maintaining peak stormwater flows to pre development levels are all effective techniques for managing flooding and can reduce the impacts to people and property during a flood event.	Accept
SO210.5	Natural Hazards Commission Toka Tū Ake			SO210.5	Natural Hazards Commission Toka Tū Ake	MRZ-P7	Support	Retain as notified	We support avoiding development in the Stormwater Overlay and requiring a suitably qualified stormwater design consultant to prepare a site-specific management plan. The Stormwater Overlay represents an area	Accept in part
SO210.6	Natural Hazards Commission Toka Tū Ake			SO210.6	Natural Hazards Commission Toka Tū Ake	MRZ-R7	Support	That the provisions for both permitted and restricted discretionary activities be retained subject to amendments to MRZ S11.	We support the construction of up to three residential units and papakāinga being a permitted activity provided they are outside of the Stormwater Overlay and meet the requirements for managing flood hazard. We also support it being a restricted discretionary activity if compliance with standards MRZ-S1-S20 is not achieved. However, we have provided recommendations for amendments to MRZ S11 as part of this submission.	Accept in part
SO210.7	Natural Hazards Commission Toka Tū Ake			SO210.7	Natural Hazards Commission Toka Tū Ake	MRZ-R8	Support	Retain as notified	We agree that the construction of four or more residential units or papakāinga should be a restricted discretionary activity.	Accept in part
SO210.8	Natural Hazards Commission Toka Tū Ake			SO210.8	Natural Hazards Commission Toka Tū Ake	MRZ-R9	Support	That the provisions for both permitted and restricted discretionary activities be retained subject to amendments to MRZ S11.	We support that the addition or alteration of buildings and structures within the MDRZ is a permitted activity, provided compliance with standards MRZ-S1 - MRZ-20 is achieved. However, we have provided recommendations for amendments to MRZ S11 as part of this submission.	Accept in part
SO210.9	Natural Hazards Commission Toka Tū Ake			SO210.9	Natural Hazards Commission Toka Tū Ake	MRZ-R10	Support	Retain as notified	We support that the construction, alteration, or addition of buildings and structures within the Stormwater Overlay is restricted discretionary.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO210.10	Natural Hazards Commission Toka Tū Ake			SO210.10	Natural Hazards Commission Toka Tū Ake	MRZ-R11	Support	Retain as notified	We support that this is a permitted activity provided it achieves the relevant standards.	Accept in part
SO210.11	Natural Hazards Commission Toka Tū Ake			SO210.11	Natural Hazards Commission Toka Tū Ake	MRZ-R13	Support	That the provisions for both permitted and restricted discretionary activity	We support the construction of a new community house being a permitted activity provided it is outside of the Stormwater Overlay and meets the requirements for managing flood hazard.	Accept in part
SO210.12	Natural Hazards Commission Toka Tū Ake			SO210.12	Natural Hazards Commission Toka Tū Ake	MRZ-S9	Support	Retain as notified	We support the requirement of minimum permeable surfaces as part of flood management in the MDRZ. Permeable surfaces can result in less runoff and reduced stormwater during a flood event, which in turn can reduce the impacts to people and property.	Accept in part
SO210.13	Natural Hazards Commission Toka Tū Ake			SO210.13	Natural Hazards Commission Toka Tū Ake	MRZ-S10	Support	Retain as notified	We support the requirement for all sites to have a stormwater attenuation device. We also support that it must be regularly maintained, and that its capacity is in relation to development of impermeable surfaces.	Accept in part
SO210.14	Natural Hazards Commission Toka Tū Ake			SO210.14	Natural Hazards Commission Toka Tū Ake	MRZ-S11	Amend	That the following amendment is made: 1. The finished floor and ground level for all buildings, accessory buildings and structures must be at least at the required freeboard for the 2% -1% AEP flood extent for the site (including an allowance for climate change).	We recommend that minimum floor levels are built to at least 1% AEP flood extent rather than a 2% AEP flood extent. 1% AEP represents a larger flood event and so developing to this level is taking a precautionary approach to development. Using at least 1% AEP is also becoming standard across the country with many other councils (such as Wellington City Council, Auckland Council, and	Accept in part
SO210.14	Natural Hazards Commission Toka Tū Ake	FS03.5	Horizons Regional Council	SO210.14	Natural Hazards Commission Toka Tū Ake	MRZ-S11	Support	Allow	Even though Hoizons' 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.	Accept in part
SO210.15	Natural Hazards Commission Toka Tū Ake			SO210.15	Natural Hazards Commission Toka Tū Ake	SUB-MRZ-O1	Amend	Include a definition and/or metric to determine what natural hazard risk is deemed "significant" by the council.	However, it is important to clearly define what level of natural hazard risk is "significant" to avoid confusion and ensure consistent application of rules and policies. NHC has developed a Risk Tolerance Methodology ¹ that is deigned to integrate a risk tolerance assessment into existing risk management approaches. This methodology could be used by the Council to develop a metric to determine "significant" risk.	Accept in part
SO210.16	Natural Hazards Commission Toka Tū Ake			SO210.16	Natural Hazards Commission Toka Tū Ake	SUB-MRZ-P3	Amend	That the following amendments are made: 1. Further direction for what is meant by "appropriate mitigation measures" 2. That "appropriate mitigation measures" are assessed using the following criteria: <u>a) The effectiveness of any proposed natural hazard mitigation works and the alternative design options considered, including low impact design.</u> <u>b) Any adverse effects on the environment of any proposed mitigation measures.</u> c) <u>The extent to which the mitigation works transfer, or create, unacceptable hazard risk to other people, property or infrastructure.</u> <u>d) The potential for the proposal to exacerbate natural hazard risk, including transferring risk to any other site.</u> <u>e) Whether or not the work would be carried out under the supervision of either a Chartered Professional Engineer with experience in geotechnical engineering or a Professional Engineering Geologist (IPENZ registered).</u>	We support using a risk-based approach for subdividing land subject to natural hazard risk. Further direction on what "appropriate mitigation measures" are, would be useful to ensure that new or exacerbated impacts from natural hazards are avoided or reduced. Providing more direction is also necessary to avoid confusion and ensure consistent application of rules and policies.	Accept in part

Submission Point Main	Original Submitter	Further Submission Point	Further Submitter	Submission Point	Submitter/Further Submitter	Provision	Position	Relief Sought	Reason(s)	Recommendation
SO210.17	Natural Hazards Commission Toka Tū Ake			SO210.17	Natural Hazards Commission Toka Tū Ake	SUB-MRZ-P4	Support	Retain as notified	We support avoiding development in the Stormwater Overlay to avoid the impacts of flooding on people and property, and we support requiring a suitably qualified stormwater design consultant to prepare a site-specific management plan.	Accept
SO210.18	Natural Hazards Commission Toka Tū Ake			SO210.18	Natural Hazards Commission Toka Tū Ake	SUB-MRZ-R1	Support	That the provisions for both permitted and restricted discretionary activities be retained subject to amendments to MRZ-S11.	We support subdivision being a controlled activity in the MDRZ, where the site is not located in the Stormwater Overlay, and it complies with standards MRZ-S1-MRZ-S20. However, we have made recommendations for MRZ-S11 within this submission.	Accept in part
SO211.1	Ben Gadsby			SO211.1	Ben Gadsby	Zone Extent	Amend	Amend zone extent to exclude areas within 3 houses of the end of streets with a cul-de-sac and areas where long driveways already exist that service multiple properties. Also conser areas where there is high prssure on the wastewater network.	The reasons is due to already have pressure on the on road parking density and density of road side collection bins.	Reject
SO212.1	Brett Alcock, Cindy Tan and June Alcock			SO212.1	Brett Alcock, Cindy Tan and June Alcock	Entire Plan Change	Oppose	Not stated	Not stated	Reject
SO213.1	Andrea and Justin Coker			SO213.1	Andrea and Justin Coker	Entire Plan Change	Oppose	Delete the plan change.	Concerns about reduced section sizes, increased impermeable surfaces, lack of neighbour consent for taller buildings, loss of privacy, increase in noise, increased on-street parking	Reject
SO214.1	Gillian Rapson			SO214.1	Gillian Rapson	Zone Extent	Amend	Reduce zone size by about 75%	The extent of the zone is too much	Reject
SO214.2	Gillian Rapson			SO214.2	Gillian Rapson	Reserves rezoning	Oppose	Do not rezone reserves to housing.	Reserves will become more important in the future. Increased density of large buildings makes open green spaces even more rare and relatively less open.	Reject
SO214.3	Gillian Rapson			SO214.3	Gillian Rapson	Stormwater Overlay	Amend	More equitability in cost of identification of stormwater issues.	The cost should be spread across the zone as the assessment will apply at a larger scale than just a single section/site.	Reject
SO214.4	Gillian Rapson			SO214.4	Gillian Rapson	General	Amend	Separate grey water from sewage in new development	Treating sewage is expensive. The additional cost of extra plumbing lines is relatively small at the construction stage.	Reject
SO214.5	Gillian Rapson			SO214.5	Gillian Rapson	MRZ-S11	Amend	New dwellings in the areas identified as flood exposed should have their ground floors higher off the ground, and in very flood-prone levels there should be a requirement for wooden floors	Flooding preparation is needed.	Accept in part
SO214.6	Gillian Rapson			SO214.6	Gillian Rapson	MRZ-S3	Amend	Clarification required.	is there are requirement for open spaces between buildings or groups of buildings.	Accept
SO214.7	Gillian Rapson			SO214.7	Gillian Rapson	MRZ-S2	Amend	Not stated	Concerns about loss of privacy, views, sunlight access.	Reject
SO214.8	Gillian Rapson			SO214.8	Gillian Rapson	Entire Plan Change	Amend	Introduce compensation for current owners of adjacent and affected buildings for loss of capital and enjoyment value.	The current owners of adjacent and affected dwellings are the ones who experience the loss of capital value and enjoyment value in their property or properties.	Reject
SO214.9	Gillian Rapson			SO214.9	Gillian Rapson	MRZ-S5	Oppose	Not stated	Concern about loss of views and sun from tree growth, concerns about maintenance responsibility.	Reject

Appendix 2 – Redline version of Chapter 10A – Medium Density Residential Zone

Introduction

The purpose of the Medium Density Residential Zone is to increase housing supply and provide for housing choice by enabling attached and detached dwellings* and low-rise apartments at higher densities up to three storeys. The built form, appearance and amenity of the Zone will change over time as housing supply and choice increases and those living within the Zone are able to provide for their social, economic and cultural wellbeing.

The Medium Density Zone supports the physical and spiritual health of our Māori whānau, enabling them to practice their culture and provide for their *tikanga**. This includes providing safe access* to the landscapes and urban waterways valued by their tīpuna, enabling the *development** of *papakāinga** and recognising and celebrating our cultural connections with te taiao and Rangitāne whakapapa through urban design.

Properties within the Zone are connected to the city's public transport, walking and cycling networks. This facilitates mode shift from private vehicles to public or active modes of transport and supports access to a range of housing, jobs, community services, natural spaces and *public open space**.

The efficient use of *land* within the Medium Density Residential Zone is important to meet the Council's* strategic objective of a compact and connected urban form and the planned built form of the Zone reflects the anticipated change in character for the Zone. *Development** within the Zone is expected to incorporate the principles of good urban design, manage the potential *effects* of intensification and contribute to streetscape character, public safety and visual amenity.

The Medium Density Residential Zone provides for a range of compatible non-residential uses that support the needs of local communities, where these do not undermine the city's existing business zone hierarchy. Any non-residential activities that are incompatible with the Zone's planned built form and predominantly residential use are discouraged and directed to more appropriate zones such as the Business and Industrial zones.

*Development** within the Medium Density Residential Zone must manage the *effects* of residential intensification on the health, well-being and *mauri** of water bodies and freshwater, including by reducing *contaminants* from building materials, managing *stormwater*, reducing flood risk and incorporating *water sensitive design** methods into *development** design.

Palmerston North's climate is changing – in the future the city will be warmer and drier, and rainfall events will be more intense. Denser residential *development**, which is connected to active and public transport, and energy efficient housing, which optimises solar access, provides shade, manages on-site *stormwater*, incorporates space for waste and waste recycling and incorporates appropriate landscaping, will help reduce greenhouse gas emissions and create resilient housing and communities.

Objectives

MRZ-O1 Purpose of the Medium Density Residential Zone

The Medium Density Residential Zone:

- a. Enables *residential activities* and *buildings*, including *papakāinga**, to support provision of a variety of housing types and sizes that respond to housing needs and demand, and
- b. Provides for non-residential activities and *buildings* that are compatible with the predominantly residential use of the Zone, reflect the planned built form and do not compromise the existing hierarchy of business zones within the city.

MRZ-O2 Built development* in the Medium Density Residential Zone

Built *development** in the Medium Density Residential Zone positively contributes to achievement of a predominantly residential urban *environment* that:

- a. Comprises well-designed *buildings*, *sites*, streets, and neighbourhoods;
- b. Supports safe and secure environments that align with Crime Prevention through Environmental Design (CPTED) principles;
- c. Is characterised by an increased *building* density, a mix of *building* typologies, and *building heights* up to (and including) three storeys;
- ~~d. Is adaptable and healthy;~~
- e. Provides a reasonable level of amenity for residents, adjoining residential properties and the street;
- f. Enables mode shift to public transport and active transport modes;
- g. Integrates with existing and planned development infrastructure;
- h. Connects with open space and the natural *environment*;
- i. Is resilient to the *effects* of climate change and *natural hazards*; and
- j. Is energy efficient.

MRZ-O3 Protecting water bodies and freshwater ecosystems

Subdivision and *development** in the Medium Density Residential Zone contributes to an improvement in the health and wellbeing (including *mauri**) of the Manawatū Awa and its lagoons and tributaries.

MRZ-O4 Effects of flooding in the Medium Density Residential Zone

Avoid ~~residential intensification use and development*~~ unless the on-site and off-site *effects* of flooding (including from *stormwater*) on people, property and the *environment* as a result of ~~residential intensification use and development*~~ are appropriately mitigated.

MRZ-O5 Mitigate effects of development* adjacent to infrastructure and existing lawfully-established non-residential activities

Mitigate the adverse effects, including reverse sensitivity effects, of subdivision, use and development* which is located adjacent to infrastructure and existing lawfully-established non-residential activities.

MRZ-O6 Whenua Māori

Tangata whenua* are able to protect, develop and use whenua Māori in a way that is consistent with their cultural values and aspirations.

Policies

MRZ-P1 Enabled activities

Enable:

1. residential activities and buildings, including papakāinga*, that are compatible with the planned built form of the zone, and
2. non-residential activities and buildings that are compatible with the purpose of the Zone and at a scale and intensity which is compatible with the predominantly residential use of the Zone.

MRZ-P2 Residential activities and buildings, including papakāinga*, which do not meet the permitted activity standards

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.

MRZ-P3 Planned built form

Residential buildings and structures, including papakāinga*, are compatible with the planned built form of the Zone when:

1. Site layouts are coherently planned and the layout responds to the characteristics of the site and context, including adjacent waterways and public open space*;
2. Site layouts provide a good level of pedestrian access and amenity and achieve legible, visually attractive access* to the development*;
3. Site layouts provide adequate rubbish recycling collection and storage facilities
3. Residential units have appropriately sized and located private outdoor living space with a reasonable level of privacy and sunlight;
4. Building designs and site layouts provide a reasonable level of privacy and access to sunlight for residential units on the site and for those on neighbouring sites;
5. Development* frontages provide a legible connection to the street through a combination of orientation, entrance location, fencing and glazing, and they are not dominated by garages;

6. *Developments** integrate landscaping with *building* and *access** design;
7. They provide visual interest through the modulation and articulation of façades and roof forms.

MRZ-P4 – Transport

Enable *residential activities* and *buildings* when:

1. The safety and efficiency of the land transport network is maintained, including by providing for safe on-site vehicle turning and manoeuvring where off-street parking is provided; and
2. On-site bicycle parking and storage is provided to support mode shift.

MRZ-P5 Non-residential activities and buildings

Only allow non-residential activities and *buildings* where they:

1. Support the needs of local communities;
2. Are compatible with the purpose of the Zone, with a compatible scale and intensity of use;
3. Are compatible with the planned built form for the Zone;
4. Support mode shift by providing on-site bicycle parking and storage;
5. Maintain the safety and efficiency of the transport network, including by allowing for safe vehicle turning and manoeuvring where off-street parking is provided; and
6. Do not affect the City's business zones hierarchy.

MRZ-P6 Adverse effects of flooding and stormwater

On-site mitigation measures are incorporated into *subdivision*, *use* and *development** in the zone, including by requiring:

1. Minimum *permeable surface** areas to assist with reducing the rate and volume of *stormwater* run-off and improve water and soil quality;
2. *Stormwater* attenuation;
3. Adoption of minimum floor levels; and
4. That off-site *stormwater* peak flows following intensification of a *site* are maintained at pre-*development** levels.

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, including an allowance for climate change using climate change scenario SSP5-8.5;

3. Identifies the on-site and off-site effects of the proposed development* on people, property and the environment;
4. recommend~~ed~~ mitigation measures to remedy or mitigate the on- and off-site effects of the development* and how these would be maintained; and
5. demonstrates that the on- and off-site adverse effects will be appropriately mitigated.
6. Demonstrates how any 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-wide Stormwater Strategy.

MRZ-P8 Water Sensitive Design*

Water sensitive design* methods are incorporated into new subdivision and development* and they are designed, constructed and maintained to:

1. Improve the health and well-being of water bodies and freshwater ecosystems;
2. Avoid or mitigate off-site effects from surface water runoff;
3. Demonstrate best practice approach to the management of stormwater quality and quantity; and
4. Reduce demand on water supplies.

MRZ-P9 Building materials

The effects on water quality of copper and zinc entering the stormwater system from use as roofing, guttering and building materials are mitigated through the use of appropriate surface treatment, to reduce contaminant generation.

MRZ-P10 Energy efficiency

Encourage the adoption of energy efficient design and site layouts that optimise solar access and manage solar gain.

MRZ-P11 ~~Effects on of~~ buildings and activities ~~near on~~ infrastructure and existing lawfully-established non-residential activities

Manage the effects ~~on of~~ new or altered buildings and noise sensitive activities* ~~near on~~ existing infrastructure and lawfully-established non-residential activities, including by requiring:

1. Appropriate setbacks and design controls where necessary to achieve appropriate protection of infrastructure and lawfully-established non-residential activities and mitigation of effects on adjacent noise sensitive activities*.
2. All future buildings, earthworks and construction activities maintain safe electrical clearance distances in compliance with the New Zealand Electrical Code of Practice for electrical safe distances (NZECP 34:2001).

MRZ- P12 Vegetation and landscaping

Encourage the retention and incorporation of existing vegetation into the required landscaped areas where possible. Encourage replacement planting ~~to~~ that:

- a. ~~Be~~ Is of equal or better quality in terms of species, form, scale and texture;
- b. ~~Use locally sourced species~~ Utilises indigenous species, including locally sourced plant species where practicable; and
- c. Contributes to managing stormwater, urban heat effects and increases biodiversity and vegetation cover.

MRZ-P13 – Enabling *tangata whenua to provide for their cultural, social and economic well-being**

*Tangata whenua** are enabled to provide for their cultural, social and economic well-being including by:

1. *Development** of *papakāinga**; and
2. *Marae** where they are by and for Rangitāne o Manawatū.

Rules

Note: There may be a number of provisions that apply to an activity, *building*, *structure* or *site*. Resource consent may therefore be required under rules in this section as well as other sections of the District Plan. For example, rules relating to:

- *Signs, noise, earthworks* - Section 6: General Rules;
- *Subdivision* - Section 7B: *Subdivision* in the Medium Density Residential Zone;
- *Scheduled trees and heritage buildings* – Section 17: Cultural and natural heritage;
- *Access** and parking – Section 20: Land Transport; and
- *Natural hazards* – Section 22: Natural hazards.

The information requirements for a *land* use consent can be found in Chapter 5.

Definitions: unless an *italicised* term is denoted with an * (representing a definition in Section 4 of the District Plan), definitions can be found in Section 4A of the District Plan.

Rules in Section 10: Residential Zone which apply in the Medium Density Residential Zone

The following rules apply in the Medium Density Residential Zone:

Air Noise Control

- R10.6.1.1(h) – acoustic treatment and ventilation requirements
- R10.6.4.2 – *Building* alterations and addition in Air Noise Contour if established before 2 Sept 1998
- R10.6.5.2 – *Dwellings** in Inner and Outer Control Contours

- R10.6.6.1 - Prohibited activities in Air Noise Zone
- R10.7.4.9 – *Building* Alterations and additions in Air Noise Contour
- R10.7.5.2 – Non-residential *buildings* in Inner or Outer Control Contour without noise reduction
- R10.7.6.1 - Prohibited activities in the air noise contour

Awatea Stream and Jensen Street Ponding Areas

- R10.6.3.5 - Awatea Stream and Jensen Street Ponding Areas

Construction, development*, maintenance or replacement of flood protection works by Manawatū Whanganui Regional Council

- R10.7.1.8 – *Structural maintenance of flood protection works** by MWRC
- R10.7.2.1 - Construction, *development** or replacement of flood protection works by MWRC

Temporary Military Training Activities

- R10.7.1.9 - *Minor Temporary Military Training Activities*
- R10.7.4.10 - *Temporary Military training activities* which do not comply with the Performance Standards, Extended Military Training Activities, and activities including live firing of weapons, firing of blank ammunition, single or multiple explosive events, and which comply with the following Performance Standard, are Discretionary Activities.

RULES – LAND USE ACTIVITIES IN THE MEDIUM DENSITY RESIDENTIAL ZONE

MRZ-R1 Residential activities, including papakāinga*

1. Activity status: **Permitted**

MRZ-R2 Home businesses, excluding home-based childcare services

1. Activity status: **Permitted**

Where:

- a. The *site* is occupied by a residential *building* (including *papakāinga**) and used for *residential activities* by at least one person who is an employee or equivalent engaged in the *home business*, and who lives on the *site* as their principal place of residence;
- b. No more than the equivalent of three full time persons in total work in the *home business* at any one time;
- c. No more than 1 /3 of the gross floor area of a residential building, including any accessory building or external storage area, (up to a maximum of 40m² and including gross floor area and external storage areas but (excluding any car parking areas) must can be used for the home business;
- d. Activities do not create a *dust nuisance*;
- e. The *home business* does not involve the use of trucks or other heavy vehicles;
- f. The *home business* does not include the repair, alteration, restoration or maintenance of motor vehicles or internal combustion engines, or the spray painting of motor vehicles, excluding the residents' motor vehicles;
- g. Any external storage associated with the activity must be screened so they are not visible from a public road or space;
- h. Hours of operation are limited to 7.00 am to 10.00 pm Monday to Saturday;
- i. Any goods sold on the *site* must have been substantially made, repaired, renovated or restored on the *site*;
- j. All exterior lighting must comply with AS Standard 4282;
- k. *Signs** comply with R6.1.5;
- l. *Noise* complies with R10.8.1; and
- m. *Storage** of *hazardous substances* complies with R14.5.1.

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards in MRZ-R2.1.

*Council's** discretion is restricted to:

1. The extent and *effects* of non-compliance with any standard in MRZ-R2.1 which has not been met, ~~including any relevant assessment criteria for MRZ R2.1 (k) (m)~~; and
2. The relevant matters in Policy MRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R3 Home-based childcare services

1. Activity status: **Permitted**

Where:

- a. The maximum number of children enrolled does not exceed four;
- b. The hours of operation are between 7.00 am to 7.00pm Monday to Friday;
- c. *Signs** comply with R6.1.5;
- d. *Noise* complies with R10.8.1; and
- e. All exterior lighting complies with AS Standard 4282.

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards in MRZ-R3.1.

*Council's** discretion is restricted to:

1. The extent and *effects* of non-compliance with any standard in MRZ-R3.1 which has not been met, ~~including any relevant assessment criteria for MRZ R3.1 (c) and (d)~~; and
2. The relevant matters in Policy MRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R4 Conversion of a residential unit to a community house*

1. Activity status: **Permitted**

Where:

- a. Not more than the equivalent of three full time persons shall be employed on the *site*;
- b. Air noise control – compliance with R10.6.1.1 (h);
- c. Parking and *access** comply with following standards in Rule 20.4.2;
 - i. 20.4.2(a) – Vehicle *access**;
 - ii. 20.4.2(b) (i) – Parking spaces for people with disabilities;
 - iii. 20.4.2(c) – Car park landscape design;
 - iv. 20.4.2(d) – Formation of parking spaces;
 - v. 20.4.2(e) and (f) – Loading space provisions and design;
- d. *Noise* – complies with R10.8.1;
- e. *Signs** – complies with R6.1.5; and
- f. Exterior lighting must comply with AS Standard 4282; and

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards in MRZ-R4.1.

Council's* discretion is restricted to:

1. The extent and *effects* of non-compliance with any standard in MRZ-R4.1 which has not been met, ~~including any relevant assessment criteria for MRZ R4.1 (b) (e)~~ and
2. The relevant matters in MRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R5 Conversion of an existing residential unit to a Health facility*

1. Activity status: **Permitted**

Where:

- a. There are no more than three health practitioners, including a practice nurse;
- b. Parking and access* comply with the following standards in R20.4.2;
 - i. 20.4.2(a) Vehicle Access*;
 - ii. 20.4.2(b)(i) Parking Spaces for People with Disabilities;
 - iii. 20.4.2(c) Car Park Landscape Design;
 - iv. 20.4.2(d) Formation of Parking Spaces;
 - v. 20.4.2(g) Cycle Parking Provision and Design;
 - vi. 20.4.2(h) Cycle Parking End of trip Facilities.
- c. Landscape Amenity – complies with R10.7.1.2(g);
- d. Signs* comply with R6.1.5;
- e. Noise complies with R10.8.1;
- f. Air noise control complies with R10.6.1.1(h); and
- g. All exterior lighting must comply with AS Standard 4282.

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards in MRZ-R5.1.

Council's* discretion is restricted to:

1. The extent and *effects* of non-compliance with any standard in MRZ-R5.1 which has not been met, including any relevant assessment criteria for MRZ-R5.1 (c) ~~(b)-(f)~~; and
2. The relevant matters in MRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-5A Use of an existing residential unit for visitor accommodation

1. Activity status: **Permitted**

Where:

- a. There are no more than four people accommodated in the residential unit

2. Activity status: **Restricted Discretionary**

Where:

- b. There is a non-compliance with MRZ-5A.1.

Council's* discretion is restricted to:

1. The relevant matters in MRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

RULES – BUILDINGS AND STRUCTURES IN MEDIUM DENSITY RESIDENTIAL ZONE

MRZ-R6 – Repair, *demolition or removal of buildings and structures**

1. Activity status: **Permitted**

Advice note: This rule does not apply to scheduled buildings, structures and objects controlled in accordance with Section 17: Cultural and natural heritage.

MRZ-R7 Construction of up to three residential units and papakāinga* (including relocatable and prefabricated residential units)

1. Activity status: **Permitted**

Where:

- a. Compliance with the following standards is achieved:
- i. MRZ-S1 – Maximum *building height*
 - ii. MRZ-S2 – *Height in relation to boundary*

- iii. MRZ-S3 – Setbacks
 - iv. MRZ-S4 – *Building coverage*
 - v. MRZ-S5 – Landscaped areas
 - ~~vi. MRZ-S6 – Shade~~
 - vii. MRZ-S7 – *Outdoor living space*
 - viii. MRZ-S8 – Outlook space
 - ix. MRZ-S9 – *Permeable surfaces**
 - x. MRZ-S10 – *Stormwater attenuation device*
 - xi. MRZ-S11 – Minimum floor levels
 - xii. MRZ-S12 – Front façade glazing
 - xiii. MRZ-S13 – Front door orientation
 - xiv. MRZ-S14 – Garages
 - xv. MRZ-S15 – On-site carparking
 - xvi. MRZ-S16 – Vehicle crossings
 - xvii. MRZ-S17 – On-site vehicle manoeuvring
 - xviii. MRZ-S18 – On-site bicycle parking
 - xix. MRZ-S19 – On-site rubbish and recycling storage and collection
 - xx. MRZ-S20 – Fences and standalone walls
- b. Parking and access* comply with the following standards in Rule 20.4.2
- i. R20.4.2(a)(ii);
 - ii. R20.4.2(a)(vi)b),d)-~~g), i)-j)~~;
 - iii. R20.4.2(a)(vii), (ix) and (xii);
 - iv. R20.4.2(a)(viii) – applies to each *residential unit* where carparking provided;
 - v. R20.4.2 (d); and
 - vi. R20.4.2(f).

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards of MRZ-R7-1.

Council's* discretion is restricted to:

- 1. The matter(s) of discretion for any infringed standard in MRZ-R7.1(a);
- 2. The extent and *effects* of non-compliance with any standard in MRZ-R7.1(b) which has not been met, ~~including any relevant assessment criteria~~; and
- 3. The relevant matters in MRZ-P2, MRZ-P3, MRZ-P4, MRZ-P6, MRZ-P8, MRZ-P10, MRZ-P11 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R8 Construction of four or more *residential units* and *papakāinga* (including *relocatable and prefabricated residential units*)

1. Activity status: **Restricted Discretionary**

Council's* discretion is restricted to:

1. The extent and effects of non-compliance with standards MRZ-S1 – S20;
2. The relevant matters in MRZ-P2, MRZ-P3, MRZ-P4, MRZ-P6, MRZ-P8, MRZ-P10, MRZ-P11 and MRZ-P12; and
3. The layout and design of services and service connections to essential services.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R9 - Addition or alteration of buildings and structures (excluding accessory buildings)

1. Activity status: **Permitted**

Where:

a. Compliance with the following standards is achieved where the addition or alteration triggers one or more of the following standards:

- i. MRZ-S1 – Maximum *building height*
- ii. MRZ-S2 – *Height in relation to boundary*
- iii. MRZ-S3 – *Setbacks*
- iv. MRZ-S4 – *Building coverage*
- v. MRZ-S5 – *Landscaped areas*
- ~~vi. MRZ-S6 – *Shade*~~
- vii. MRZ-S7 – *Outdoor living space*
- viii. MRZ-S8 – *Outlook space*
- ix. MRZ-S9 – *Permeable surfaces**
- x. MRZ-S10 – *Stormwater attenuation device*
- xi. MRZ-S11 – *Minimum floor levels*
- xii. MRZ-S12 – *Front façade glazing*
- ~~xiii. MRZ-S13 – *Front door orientation*~~
- ~~xiv. MRZ-S14 – *Garages*~~
- ~~xv. MRZ-S15 – *On-site carparking*~~
- ~~xvi. MRZ-S16 – *Vehicle crossings*~~
- ~~xvii. MRZ-S17 – *On-site vehicle manoeuvring*~~
- ~~xviii. MRZ-S18 – *On-site bicycle parking*~~
- ~~xix. MRZ-S19 – *On-site rubbish storage and collection*~~
- ~~xx. MRZ-S20 – *Fences and standalone walls; and*~~

~~b. Parking and access* comply with the following standards in Rule 20.4.2~~

- ~~i. R20.4.2(a)(ii)~~
- ~~ii. R20.4.2(a)(vi)b, d) - j)~~
- ~~iii. R20.4.2(a)(vii), (ix) and (xii)~~
- ~~iv. R20.4.2(a)(viii) – if on-site parking is provided~~

- v. ~~R20.4.2 (d) and~~
- vi. ~~R20.4.2(f).~~

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards in MRZ-R9.1.

Council's* discretion is restricted to:

- 1. The matter(s) of discretion for any infringed standard in MRZ-R9.1 (a);
- 2. The extent and effects of non-compliance with any standard in MRZ-R9.1 (b) which has not been met, ~~including the relevant assessment criteria~~; and
- 3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P6, MRZ-P10 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R10 – ~~Construction, alteration or addition of~~ Bbuildings and structures within the Stormwater Overlay

~~1.~~ Activity status: **Permitted Activity**

Where:

- a. The construction of new buildings and structures; and
- b. The alteration or addition of any buildings and structures.

does not increase the building coverage by more than a cumulative total of 30m² as measured from the date of [date the plan was made operative].

~~12.~~ Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with MRZ-R10.1.

Council's* discretion is restricted to:

- 1. The extent to which any stormwater-related effects, both on-site and off-site, are avoided or mitigated;
- 2. Whether the proposed mitigation measures can be effectively implemented and maintained;

3. 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-wide Stormwater Strategy; and
4. The relevant matters in MRZ-P6, [and](#) MRZ-P7 ~~and MRZ-P8~~.

Advice Note:

A site-specific stormwater management plan prepared to meet the requirements of SUB-MRZ-R1.2 may be sufficient to meet the requirements of this rule, subject to the management plan being prepared based on the most up to date flood data.

[The Palmerston North Stormwater Bylaw includes information about the Council's expectations for operation and maintenance of stormwater attenuation on private property.](#)

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R11 Construction ~~of~~, addition, and alteration ~~effo~~ accessory buildings

1. Activity status: **Permitted**

Where:

- a. Compliance with the following standards is achieved:
 - i. MRZ-S1 – Maximum *building height*
 - ii. MRZ-S2 – *Height in relation to boundary*
 - iii. MRZ-S4 – *Building coverage*
 - iv. MRZ-S9 – *Permeable surfaces**; and
 - v. MRZ-S10 – *Stormwater attenuation device.*

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards in MRZ-R11.1.

Council's* discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-R11.1; and
2. The relevant matters in MRZ-P3, MRZ-P6 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R12**Educational facility (including kohanga reo* and kura kaupapa*)**1. Activity status: **Permitted**

Where:

- a. The *educational facility* has access* from a Minor Arterial or Collector Road, listed as such in 20.6.1.2 and 20.6.1.3;
- b. Any *building* used for educational purposes is offset from an adjacent residentially-used property by 6 metres;
- c. *Building coverage* must not exceed 40% of the *site*;
- d. Compliance with the following standards is achieved:
 - i. MRZ-S1 – Maximum *building height*;
 - ii. MRZ-S2 – *Height in relation to boundary*;
 - iii. MRZ-S9 – *Permeable surfaces**;
 - iv. MRZ-S10 – *Stormwater* attenuation device;
 - v. MRZ-S11 – Minimum floor levels; and
- e. Air Noise Control – compliance with R10.6.1.1(h)
- f. Landscaping and fencing – complies with R10.7.1.3(g)
- g. Parking and access* comply with following standards in Rule 20.4.2:
 - i. 20.4.2(a) – Vehicle access*;
 - ii. 20.4.2(b)(i) – Parking spaces for people with disabilities;
 - iii. 20.4.2(c) – Car park landscape design;
 - iv. 20.4.2(d) – Formation of parking spaces;
 - v. 20.4.2(e) and (f) – Loading space provisions and design;
 - vi. 20.4.2(g)- Cycle parking provisions and design; and
 - vii. 20.4.2(h) – Cycle parking end-of-trip facilities.
- h. Noise complies with R10.8.1;
- i. Signs comply with Rule 6.1.5; and
- j. Exterior lighting must comply with AS Standard 4282.

2. Activity status: **Restricted Discretionary**

Where:

- a. There is a non-compliance with one or more of the standards in MRZ-R12.1.

Council's* discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-R12.1(d); and
2. The extent and effects of non-compliance with any requirement in MRZ-R12.1 ~~(e)-(j)~~ which has not been met, including any relevant assessment criteria for MRZ-R12.1 ~~(f)-(j)~~; and
3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P6, MRZ-P10 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R13 Construction of a new community house*

1. Activity status: **Permitted**

Where:

a. Compliance with the following standards is achieved:

- i. MRZ-S1 – Maximum *building height*
 - ii. MRZ-S2 – *Height in relation to boundary*
 - iii. MRZ-S3 – *Setbacks*
 - iv. MRZ-S4 – *Building coverage*
 - v. MRZ-S5 – *Landscaped areas*
 - ~~vi. MRZ-S6 – *Shade*~~
 - vii. MRZ-S7 – *Outdoor living space*
 - viii. MRZ-S8 – *Outlook space*
 - ix. MRZ-S9 – *Permeable surfaces**
 - x. MRZ-S10 – *Stormwater attenuation device*
 - xi. MRZ-S11 – *Minimum floor levels*
 - xii. MRZ-S12 – *Front façade glazing*
 - xiii. MRZ-S13 – *Front door orientation*
 - xiv. MRZ-S14 – *Garages*
 - xv. MRZ-S15 – *On-site carparking*
 - xvi. MRZ-S16 – *Vehicle crossings*
 - xvii. MRZ-S17 – *On-site vehicle manoeuvring*
 - xviii. MRZ-S19 – *On-site rubbish and recycling storage and collection*
 - xix. MRZ-S20 – *Fences and standalone walls; and*
- b. Air noise control – compliance with R10.6.1.1 (h)
- c. Parking and access* comply with following standards in Rule 20.4.2:
- i. 20.4.2(a) – *Vehicle access* excluding (vi)(h)*;
 - ii. 20.4.2(b)(i) – *Parking spaces for people with disabilities;*
 - iii. 20.4.2(c) – *Car park landscape design;*
 - iv. 20.4.2(d) – *Formation of parking spaces;*
 - v. 20.4.2(e) and (f) – *Loading space provisions and design;*
- d. *Noise* – complies with R10.8.1
- e. *Signs* – complies with R6.1.5; and
- f. *Exterior lighting* must comply with AS Standard 4282.

2. Activity status: **Restricted Discretionary**

Where:

1. There is a non-compliance with one or more of the standards in MRZ-R13-1.

*Council's** discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-R13.1(a)
2. The extent and effects of non-compliance with any requirement in MRZ-R13.1(b)-(f) which has not been met, ~~including any relevant matters of discretion assessment criteria for MRZ-R13.1(b)-(e)~~; and
3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P6, MRZ-P10 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R14 Visitor accommodation

1. Activity status: **Permitted**

Where:

- a. *Visitor accommodation* is located on properties with a frontage and the main entrance from a street listed as a Major Arterial or Minor Arterial Road in 20.6.1.1 and 20.6.1.2 in Section 20 of the District Plan.
- b. Compliance with the following standards is achieved:
 - i. MRZ-S1 – Maximum *building height*;
 - ii. MRZ-S2 – *Height in relation to boundary*;
 - iii. MRZ-S3 – *Setbacks*;
 - iv. MRZ-S4 – *Building coverage*;
 - v. MRZ-S9 – *Permeable surfaces**;
 - vi. MRZ-S10 – *Stormwater attenuation device*;
 - vii. MRZ-S11 – *Minimum floor levels*;
 - viii. MRZ-S20 – *Fences and standalone walls*;
- c. Landscape/fencing – complies with R10.7.1.2(g)
- d. Parking and access* comply with R20.4.2;
 - i. 20.4.2(a) *Vehicle Access**;
 - ii. 20.4.2(b)(i) *Parking Spaces for People with Disabilities*;
 - iii. 20.4.2(c) *Car Park Landscape Design*;
 - iv. 20.4.2(d) *Formation of Parking Spaces*;
 - v. 20.4.2(g) *Cycle Parking Provision and Design*;
 - vi. 20.4.2(h) *Cycle Parking End of trip Facilities*; and
- e. All exterior lighting must comply with AS Standard 4282.

2. Activity status: **Restricted Discretionary**

Where:

f.a. Compliance with one or more of the standards of MRZ-R14-1 is not achieved.

*Council's** discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-R14.1(b);
2. The extent and effects of non-compliance with any standard in MRZ-R14.1(c)-(e) which has not been met, including any relevant assessment criteria for MRZ-R14.1 ~~(c)(b)-(d)~~; and
3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P6, MRZ-P10 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R15 Construction of a new Health facility*

1. Activity status: **Permitted**

Where:

- a. There are no more than three health practitioners, including a practice nurse;
- b. Compliance with the following standards is achieved:
 - i. MRZ-S1 – Maximum *building height*;
 - ii. MRZ-S2 – *Height in relation to boundary*;
 - iii. MRZ-S3 – *Setbacks*;
 - iv. MRZ-S4 – *Building coverage*;
 - v. MRZ-S9 – *Permeable surfaces**;
 - vi. MRZ-S10 – *Stormwater attenuation*;
 - vii. MRZ-S11 – *Minimum floor levels*;
 - viii. MRZ-S12 – *Front façade glazing*;
 - ix. MRZ-S14 – *Garages*;
- c. Parking and access* comply with R20.4.2;
 - i. 20.4.2(a) *Vehicle Access**;
 - ii. 20.4.2(b)(i) *Parking Spaces for People with Disabilities*;
 - iii. 20.4.2(c) *Car Park Landscape Design*;
 - iv. 20.4.2(d) *Formation of Parking Spaces*;
 - v. 20.4.2(g) *Cycle Parking Provision and Design*;
 - vi. 20.4.2(h) *Cycle Parking End of trip Facilities*
- d. Landscape/fencing – complies with R10.7.1.2(g)
- e. Signs comply with R6.1.5;
- f. Noise complies with R10.8.1;
- g. Air noise control complies with R10.6.1.1(h); and
- h. All exterior lighting must comply with AS Standard 4282.

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with one or more of the standards of MRZ-R15.1 is not achieved.

Council's* discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in MRZ-R15.1(b)
2. The extent and effects of non-compliance with any requirement in MRZ-R15.1(c)-(h) which has not been met, including any relevant assessment criteria for MRZ-~~R14.1~~R15.1; and
3. The relevant matters in MRZ-P3, MRZ-P4, MRZ-P5, MRZ-P6, MRZ-P10 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R16 Marae*

1. Activity status: **Restricted Discretionary**

Council's* discretion is restricted to:

1. The effects on pedestrian safety and the safe and efficient movement of vehicles and other road users;
2. The extent to which site layout and any proposed landscaping helps avoid or minimise effects from building bulk and form on surrounding residential areas, the streetscape, and adjoining public space in relation to building dominance, privacy and shading;
3. The matter(s) of discretion in MRZ-S1, MRZ-S2, MRZ-S3, MRZ-S4, MRZ-S5, ~~MRZ-S6~~ and MRZ-S17; and
4. The relevant matters in MRZ-P4, MRZ-P5, MRS-P6, MRZ-P8, MRZ-P10, MRZ-P11 and MRZ-P12.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

Rangitāne o Manawatū must be limited notified in accordance with section 95A of the Resource Management Act 1991 of an application under this rule if the applicant is an iwi*, hapū*, whānau, Māori or other entity other than Rangitāne o Manawatū, unless they provide written approval to the proposal.

MRZ-R17 Retirement Villages and Residential Centres*, ~~Visitor Accommodation Motel Conference Centres~~ with frontage to a Major Arterial or Minor Arterial Road as listed in Appendix 20A, Community Facilities, Places of Worship*, Training Facilities*, Health Centres* and Hospitals and Early Childhood Facilities*

1. Activity status: **Discretionary**

MRZ-R18 Fences and standalone walls

1. Activity status: **Permitted**

Where:

- a. Compliance with MRZ-S~~620~~ is achieved:

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with MRZ-R18-1 is not achieved.

Council's* discretion is restricted to:

1. The matters of discretion for MRZ-S~~620~~.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R19 – *Buildings, accessory buildings or structures adjacent to overhead electricity lines**

~~2.~~ 1. Activity status: **Permitted**

Where:

- a. any *building, accessory building or structure* is set back from an overhead electricity *line** in accordance with the New Zealand Electrical Code of Practice for Electrical Safe Distances – NZECP 34:2001.

Advice note:

This rule applies where a *site* contains or adjoins an overhead electricity *line** (e.g. on legal road).

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with MRZ-R19-1. is not achieved;

Council's* discretion is restricted to:

1. Whether the *building, accessory building or structure* will interfere with the safe and efficient operation, maintenance or *minor upgrading** of the overhead electricity *lines**; and

2. The risk of electrical hazards and/or faults.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

Powerco Limited (or its successor) must be given limited notification of an application under this rule, in accordance with section 95B of the Resource Management Act 1991, unless they have provided written approval.

MRZ-R20 New buildings or alterations or additions to buildings within 50m of the state highway

1. Activity status: **Permitted**

Where:

- a. any alteration or addition to a *building* does not increase the floor area by more than 10% and the addition or alteration does not increase the number of bedrooms or sleeping rooms; and
- b. *habitable rooms* are:
 - i. Designed, constructed and maintained to achieve a maximum indoor design noise level of 40 dB LAeq (24hr) inside any new or altered *habitable room*;
 - ii. For *buildings* which require windows to be closed to achieve the relevant noise levels in (a), MRZ-S21 – Ventilation Standard can be met; and
- c. A report, prepared by an *acoustical consultant**, is submitted to the *Council** demonstrating compliance with (b).

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with MRZ-R20-1 is not achieved;

*Council's** discretion is restricted to:

1. The extent to which *noise* generated by use of the state highway will adversely affect the health and wellbeing of people;
2. The extent to which *noise* will detract from *amenity values* expected for the zone; and
3. Reverse sensitivity *effects* on the safe and efficient operation of the state highway.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991. [The New Zealand Transport Agency](#)

Waka Kotahi (or its successor) must be given limited notification of an application under this rule unless they have provided written approval.

MRZ-R21 Building setback from rail corridor for construction, addition and alteration of any building

1. Activity status: **Permitted**

Where any *building, accessory building or structure* is:

- a. Set back at least 5m from the *rail corridor*.

2. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with MRZ-R21-1 is not achieved;

Council's* discretion is restricted to:

1. The location and design of the *building or structure* as it relates to the ability to safely use, access and maintain *buildings* without requiring access on, above or over the rail designation boundary; and
2. The extent to which the reduced setback will compromise the safe and efficient functioning of the rail network, including *rail corridor* access and maintenance.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

KiwiRail Limited (or its successor) must be given limited notification of an application under this rule unless they have provided written approval.

MRZ-R22 New buildings or alterations or additions to buildings within 100m of the rail corridor

1. Activity status: **Permitted**

Where:

- a. any alteration or addition to a *building* does not increase the floor area by more than 10% and the addition or alteration does not increase the number of bedrooms or sleeping rooms; and
- b. *noise sensitive activities**:
 - i. Are designed, constructed and maintained to achieve the indoor design noise levels in Table 1 or:

Building Type	Occupancy/activity	Maximum railway noise level LAeq(1h)
Residential	Sleeping spaces	35dB
	Other habitable rooms	40dB
Visitor Accommodation	Sleeping spaces	35dB
	Other habitable rooms	40dB
Education Facility	Lecture rooms/theatres, music studios, assembly halls	35dB
	Teaching areas, conference rooms, drama studies, sleeping areas	40dB
	Libraries	45dB
Health	Overnight medical care, wards	40dB
	Clinics, consulting rooms, theatres, nurses' stations	45dB
Cultural	Places of worship, marae	35 dB

- ii. It can be demonstrated by way of prediction or measurement that the noise at all exterior façades of the listed activity is no more than 15dB above the relevant noise level in Table 1; and
- iii. For *buildings* which require windows to be closed to achieve the relevant noise levels in (a), MRZ-S21 – Ventilation Standard can be met; and
- c. A report, prepared by an *acoustical consultant** is submitted to the *Council** demonstrating compliance with (b).

Advice Note:

Buildings, structures and activities within 100m of the designated rail corridor may be subject to vibration effects from rail activities. There are no rules or standards which apply to vibration.

1. Activity status: **Restricted Discretionary**

Where:

a. Compliance with one or more of the standards in MRZ-R22-1 is not achieved;

*Council's** discretion is restricted to:

- 1. The extent and *effect* of non-compliance with MRZ-R22-1; and

2. The extent of *effects* on health and wellbeing for occupants of the *building* to which the rule applies.
3. The relevant matters in MRZ-P11.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

KiwiRail Limited (or its successor) must be given limited notification of an application under this rule unless they have provided written approval.

MRZ-R23 Copper and zinc *building materials* – all residential and non-residential *buildings*

1. Activity status: **Permitted**

Where:

- a. new *buildings* and *structures*, or additions and alterations to existing *buildings* and *structures*, use copper or zinc cladding and/or roofing materials (including guttering and spouting) these materials are sealed or otherwise finished to prevent water runoff which contains copper or zinc.

2. Activity Status: **Restricted Discretionary**

Where:

- a. The standard in MRZ-R23.1 is not met.

Matter of discretion are restricted to:

1. How *stormwater* from copper or zinc cladding or roofing materials will be treated to prevent these *contaminants* from entering the stormwater network.

Notification:

An application under this rule is precluded from being publicly or limited notified in accordance with section 95A of the Resource Management Act 1991.

MRZ-R24 Stormwater treatment for parking and manoeuvring areas, and access ways four or more carparks (including garages)

1. Activity status: **Permitted**

Where:

- a. The cumulative area of any parking area, manoeuvring area and access way on a site is less than 100m².

21. Activity status: **Restricted Discretionary**

Where:

a. The standard in MRZ-R24.1 is not met.

Council's* discretion is restricted to:

1. The extent to, and method(s) by, which stormwater runoff from the parking area, carports, including any manoeuvring areas, is captured and directed to a *stormwater* treatment device;
2. The suitability of the *stormwater* treatment device for treating the predicted volume of *stormwater*, potential *contaminants* and *site* conditions; and
3. The proposed approach to ongoing maintenance of the *stormwater* treatment device to secure ongoing operation.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

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 Council's Residential Bioretention Design Guide.

The Palmerston North Stormwater Bylaw includes information about the Council's expectations for operation and maintenance of stormwater attenuation on private property.

MRZ-R25 Any activity not otherwise identified as permitted, controlled, restricted discretionary or discretionary

1. Activity status: **Discretionary**

Where:

a. Any activity or the construction, alteration or addition of buildings or structures is not provided for in rules MRZ-R1-R24

MEDIUM DENSITY RESIDENTIAL ZONE STANDARDS

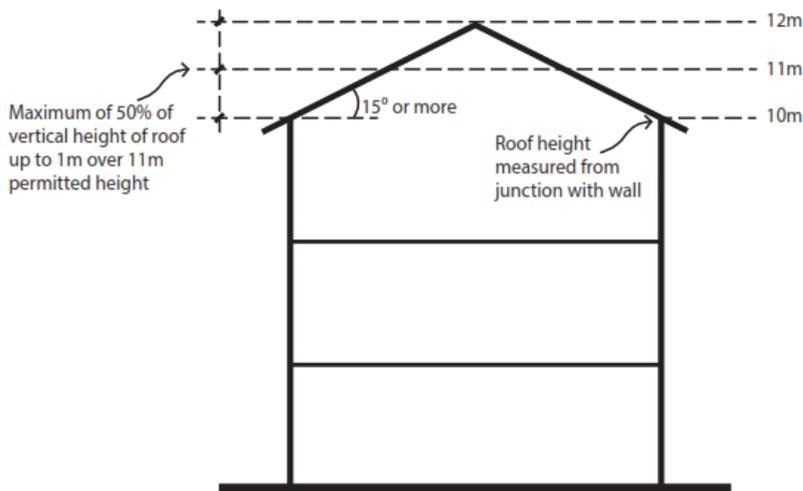
MRZ-S1 Maximum building height

1. Buildings or structures ~~(excluding garages and accessory buildings)~~ may not exceed a maximum height of 11 metres above ground level.

Matters of discretion where the standard is infringed:

<p>Except that:</p> <ul style="list-style-type: none"> 50% of a <i>building's</i> roof in elevation, measured vertically from the junction between wall and roof, may exceed this <i>height</i> by 1 metre, where the entire roof slopes 15° or more, as illustrated in MRZ-Figure 1 below. <p>2. Garages or accessory buildings may not exceed a maximum height of 2.8m above ground level.</p> <p>MRZ-S1 does not apply to:</p> <ul style="list-style-type: none"> Fences and standalone walls (<u>refer MRZ-S20</u>); Solar panel and heating components attached to a <i>building</i> provided these do not exceed the <i>height</i> by more than 500mm; or Satellite dishes, <i>antennas*</i>, aerials, flues, architectural or decorative features (e.g. finials and spires) provided that none of these exceed 1m in diameter and do not exceed the <i>height</i> by more than 2 metres measured vertically. 	<ol style="list-style-type: none"> Dominance effects on adjoining residential sites.
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MRZ-Figure 1 Diagram showing maximum building height



MRZ-S2 Height in relation to boundary

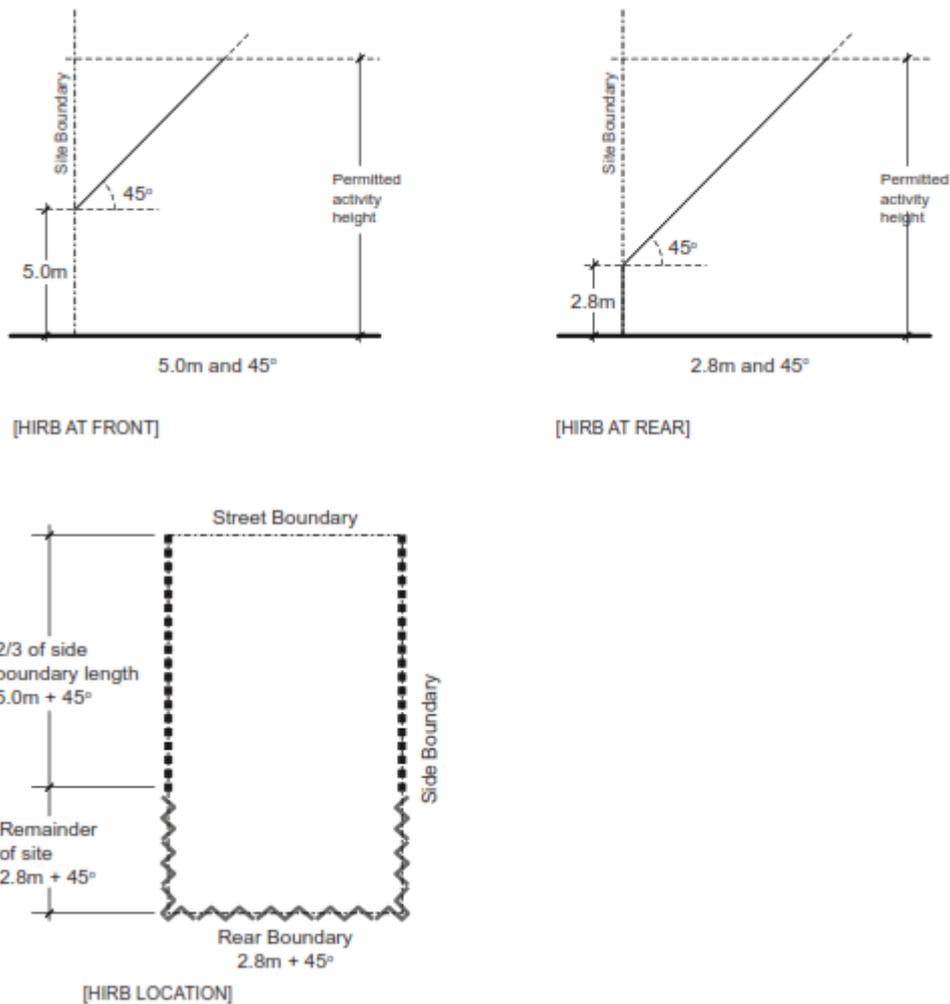
<ol style="list-style-type: none"> All <i>buildings and structures</i> (<u>excluding accessory buildings</u>) must be contained beneath recession planes, inclined inwards at <u>right angles, of:</u> <ol style="list-style-type: none"> 45° measured from a point <u>of 5.0 metres above ground level and perpendicular to the boundary,</u> for the greater distance of either 15 metres, or the first two- 	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> Shading effects on adjoining residential sites;
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<p>thirds of the <i>site</i>, from the boundary with a public road; and</p> <p>b. 45° measured from a point of 2.8 metres above <i>ground level</i> <u>and perpendicular to the boundary</u>, for the remainder of the <i>site</i>.</p> <p><u>2. Accessory buildings (including detached garages) must be contained beneath a 45° recession plane measured from a point 2.8 metres above ground level and perpendicular to the boundary.</u></p> <p>MRZ-S2.1 does not apply:</p> <ul style="list-style-type: none"> • To a boundary with a public road; • Existing or proposed internal boundaries within a <i>site</i>; • <i>Site</i> boundaries where there is an existing or proposed common wall; • Solar panel and heating components attached to a <i>building</i> provided these do not exceed the <i>height</i> by more than 500 mm; and • Satellite dishes, <i>antennas*</i>, aerials, chimneys, flues, architectural or decorative features (e.g. finials and spires) provided that none of these exceed 1 metre in diameter and do not exceed the <i>height</i> by more than 2 metres measured vertically. <p>3. For rear <i>sites</i>, where the site does not contain any boundaries with a public road other than for an <i>access strip*</i>; all <i>buildings</i> and <i>structures</i> must be contained beneath a <i>line*</i> of 45° measured from a point of 2.8 metres above <i>ground level</i> <u>and perpendicular to the boundary inclined inwards at right angles</u>.</p> <p>Where the <i>site</i> boundary forms part of a legal right of way, <i>access strip*</i>, or pedestrian <i>access strip*</i>, MRZ-S2 applies from the farthest boundary of that legal right of way, <i>access strip*</i> or pedestrian <i>access strip*</i>.</p> <p>MRZ-S2 does not apply to:</p> <ul style="list-style-type: none"> • Existing or proposed internal boundaries within a <i>site</i>. • <i>Site</i> boundaries where there is an existing or proposed common wall. • Solar panel and heating components attached to a <i>building</i> provided these do not exceed the <i>height</i> by more than 500 mm. • Satellite dishes, <i>antennas*</i>, aerials, chimneys, flues, architectural or decorative features (e.g. finials and spires) provided that none of these exceed 1 metre in diameter 	<p>2. Privacy <i>effects</i> on adjoining residential sites; and</p> <p>3. Dominance <i>effects</i> on adjoining residential sites.</p>
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and do not exceed the *height* by more than 2 metres measured vertically.

See Figure MRZ-Figure 2 which demonstrates how the *height in relation to boundary* is to be measured.

MRZ-Figure 2 Diagram showing *height in relation to boundary*



MRZ-S3 **Setbacks**

1. Any *building* must be set back from the relevant boundary by the minimum depth listed in the following Yards table.
~~For a corner site* with frontages to two public roads, the front yard requirement applies to the primary frontage.~~

Matters of discretion where the standard is infringed:

1. Shading effects on adjoining sites;
- ~~2. Loss of privacy effects on adjoining residential sites;~~

Yard	Minimum Depth	
Front	<p>1.5 metres from a public road <u>for sites with no direct vehicle access to that road where there is no parking in the front yard</u></p> <p><u>1.5 metres from a garage (internal or standalone).</u></p>	<p>3. Dominance effects on adjoining residential sites. and</p> <p>4. Safety effects on the land transport network and pedestrians.</p> <p>5. <u>Reverse sensitivity effects on existing, lawfully-established, non-residential activities</u></p>
Front	<p>5.5 metres for that part of the frontage where a parking space is provided <u>in front of the residential unit or a detached garage is at 90 degrees to the street frontage. but no garage (internal or standalone).</u></p>	
Side and rear	<p>1 metre</p>	
Side and rear	<p><u>0 metres for the first 7 metres of a garage, whether detached or integrated into the residential unit, provided that that part of the garage within 1m from the side or rear boundary is contained beneath a 45° recession plane measured from a point 2.8 metres above ground level and perpendicular to the boundary.</u></p> <p><u>1 metre for that part of a garage (whether detached or integrated into the residential unit) which is longer than 7 metres.</u></p>	
<p>2.—A front-facing garage must be set back in accordance with the following Garage Setback table</p>		

Boundary	Depth		
With public road, where no parking is provided in front of the garage	2.5 metres		
With public road where parking is provided in front of garage	At least 5.5 metres		
Side and rear	1 metre for that part of a garage which is longer than 7 metres		
<p>3. A side entry garage must be set back a minimum of 1.5 metres from a boundary fronting a public road.</p>			
<p>MRZ-S3 does not apply to:</p>			
<ul style="list-style-type: none"> • Accessory buildings located in the side or rear yards. • Site boundaries where there is an existing or proposed common wall. • Fences or standalone walls. • Uncovered deck and uncovered structures no more than 1 metre in height above ground level. • Eaves up to 600 mm wide. For eaves wider than 600mm only the additional width beyond 600mm is included in the site coverage calculation. 			
<p>MRZ-S4 Building coverage</p>			
<p>1. Maximum building coverage <u>of all buildings on a site</u> must not exceed 50% of the net site area.</p>		<p>Matters of discretion where the standard is infringed:</p>	
<p>MRZ-S4 does not apply to:</p>		<p>1. The effects of increased building coverage on stormwater discharges from the site and flows;</p> <p>2. Shading effects on adjoining sites;</p>	
<ul style="list-style-type: none"> • Uncovered deck and uncovered structures no more than 1 metre in height above ground level. • Eaves up to 600 mm wide. For eaves wider than 600mm only the additional width beyond 600mm is included in the site coverage calculation. 			

	<p>3. Loss of privacy effects on adjoining residential sites; and</p> <p>4. Dominance effects on adjoining residential sites.</p>
<p>MRZ-S5 Landscaped area</p>	
<p>1. A ground floor residential unit, papakāinga* or community house* must have a landscaped area of grass and/or plants covering at least 20% of the site;</p> <p>2. Where a site fronts a public road, at least 30% of the required landscaped area must be located in the front yard, for a depth of at least 1m;</p> <p>3. At least one specimen tree capable of growing to a minimum height of four metres after five <u>ten</u> years must be provided for each ground floor residential unit, papakāinga* or community house*.</p> <p>4. The specimen tree must be located in the outdoor living space required by MRZ-S7(2) where this is provided at the street frontage located in the front yard of a residential unit, papakāinga* or community house*.</p>	<p>Matters of discretion if the standard is infringed:</p> <p>1. Effect of increased hard standing on visual amenity;</p> <p>2. The contribution of landscaping to visual interest, <u>stormwater management, shade and habitat</u>; and</p> <p>3. Integration of landscaping and building and access* design.</p>
<p>MRZ-S6 Shade</p>	
<p>1. Every residential unit, papakāinga* or community house* must be provided with an outdoor space which is shaded between December and March.</p> <p>2. Where the shaded outdoor space is provided at ground level, at midday it must provide:</p> <p style="padding-left: 40px;">a. a minimum area of 15m² for a residential unit, papakāinga* or community house* with two or more bedrooms; or</p> <p style="padding-left: 40px;">b. a minimum area of 10m² for a residential unit, papakāinga* or community house* with one bedroom.</p> <p>3. Where the shaded outdoor space is provided above ground level, or the residential unit or papakāinga* is a ground floor apartment, at midday it must provide:</p>	<p>Matters of discretion if the standard is infringed:</p> <p>1. Whether a proposed alternative solution for shading will achieve the same outcome within a reasonable timeframe.</p>

<p>a. a minimum area of 2.5m² for a one bedroom residential unit or community house*; or</p> <p>b. a minimum area of 4m² for a two or more bedroom residential unit or community house*.</p> <p>Advice Note: Where a tree is the mechanism to provide shade, the mature canopy size at year four can be used to determine the minimum area.</p>	
<p>MRZ-S7 Outdoor living space (per unit)</p>	
<ol style="list-style-type: none"> 1. Every residential unit, papakāinga* or community house* must be provided with an outdoor living space. 2. Where the outdoor living space is provided at ground level it must provide: <ol style="list-style-type: none"> a. a minimum area of 30m² which can accommodate a 4.5 metre diameter circle for a residential unit or community house* with two <u>three</u> 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 one bedroom <u>up to two bedrooms</u>; and c. a gradient no greater than 1 in 20. 3. Where the outdoor living space is provided above ground level, or the residential unit is a ground floor apartment, it must provide: <ol style="list-style-type: none"> a. a minimum area of 5m² for a one bedroom residential unit or community house*; or b. a minimum area of 8m² for a two or more bedroom residential unit or community house*; and c. be no less than 1.5 metres wide. 4. All individual outdoor living spaces must be located to the north, east or west of the residential unit or community house* and have direct contact with, and a connection via a door to, the main kitchen, dining or living area. 5. Any communal outdoor living space must <ol style="list-style-type: none"> a. be oriented to face north, east or west; b. be accessible to all residential units; and c. be overlooked by related residential units, papakāinga* or community house*. 	<p>Matters of discretion if the standard is infringed:</p> <ol style="list-style-type: none"> 1. Whether other on-site factors compensate for a reduction or change in the size, location or dimension of the outdoor living space; and 2. Availability of public open space* in proximity to the site.

Advice Note: An *outdoor living space* may include some or all of the landscaped area required by MRZ-S5.

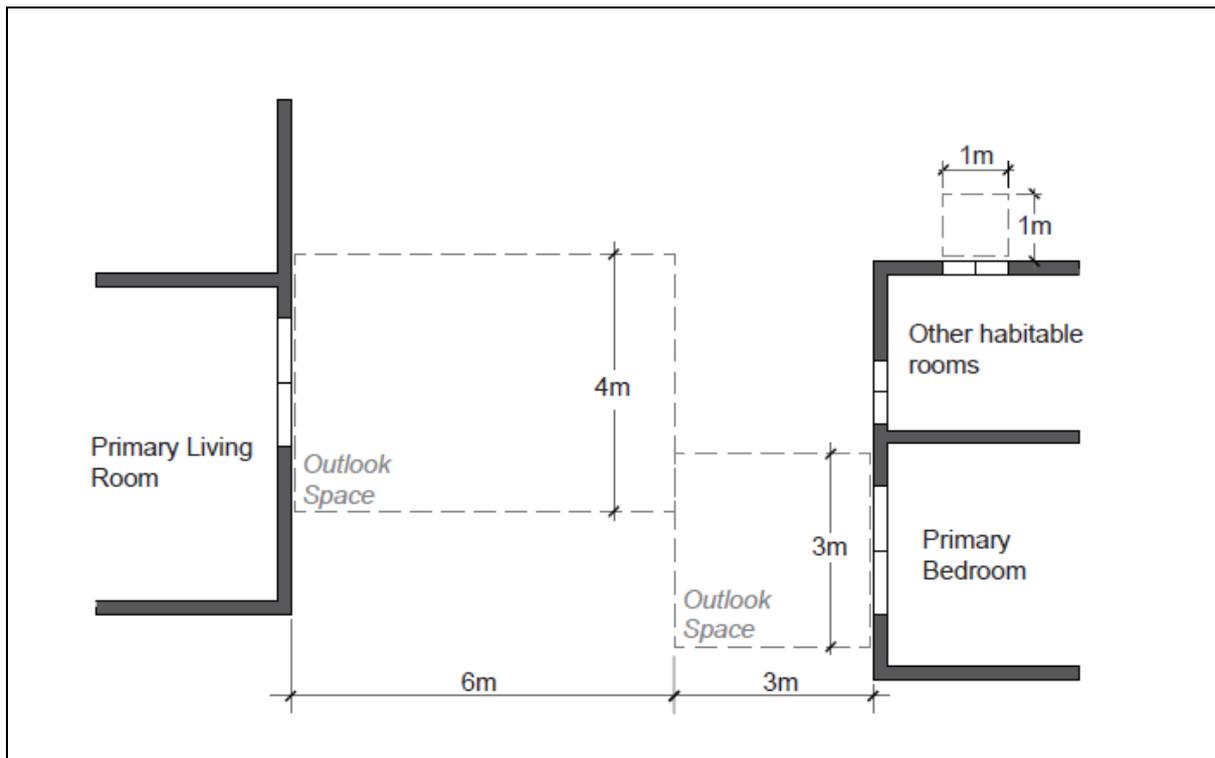
MRZ-S8 Outlook space (per unit)

1. An outlook space must be provided for every *residential unit, papakāinga** or *community house** which meets the following minimum dimensions (measured from the centre point of the applicable window):
 - a. 6 metres in depth x 4 metres in width outlook space for a *main living area*; and
 - b. 3 metres in depth x 3 metres in width outlook space for the primary bedroom; and
 - c. 1 metre in depth x 1 metre in width outlook space for all other *habitable rooms* and any additional windows in the main living area and/or primary bedroom.
 2. Outlook space must:
 - a. be clear and unobstructed by *buildings*; and
 - b. not extend over an outlook space or *outdoor living space* required by another *residential unit*. This requirement does not apply to *papakāinga**.
 3. Outlook space may
 - a. extend over a *public road, public open space** or driveways and footpaths within the *site*;
 - b. extend over another outlook space required within the same *residential unit* or *community house**; ~~or~~
 - c. be under or over a balcony; or
 - d. include deck balustrades, pergolas, verandas, porches and other building overhangs.
- ~~MRZ-S9 does not apply to:~~
- ~~• Deck balustrades, pergolas, verandas, porches and other building overhangs.~~
- See MRZ-Figure **43** below which demonstrates the required outlook space.

Matters of discretion where the standard is infringed:

1. Extent of loss of privacy; and
2. Extent of visual dominance and reduction in sense of space.

MRZ-Figure 43 Diagram showing outlook space



MRZ-S9 Permeable surfaces*

1. Every site must contain a minimum 30% permeable surfaces*, as a percentage of the net site area.

Advice Note:

Permeable surfaces* can include:

- Interlocking PVS cellular systems with loose aggregates.
- ~~permeable paving – see Auckland Council ‘Permeable Pavement Construction Guide’.~~
- landscape planting and grassed areas.
- decks provided the surface material allows water to drain directly through to a permeable surface*.

Matters of discretion if the standard is infringed:

1. Effects of increased impervious surfaces on stormwater discharges from the site and stormwater flows.

MRZ-S10 Stormwater attenuation device

1. Every site must include a stormwater attenuation device which is sized to contain a minimum 18 litres of water per 1m² of new impervious area.
2. Each stormwater attenuation device must be maintained on an ongoing basis.
3. Any above-ground stormwater attenuation tank must be located in a side or rear yard.

Matters of discretion if the standard is infringed:

1. Effects of reduced on-site stormwater attenuation; and
2. Whether a proposed alternative solution will attenuate stormwater to the

<p>4. <u>Stormwater attenuation tanks must not be used for rainwater harvesting.</u></p> <p>Advice Note: <u>PNCC's Stormwater Attenuation Design Guide provides guidance for stormwater attenuation tanks, including maintenance requirements</u></p>	<p>same extent and whether an alternative solution can be maintained on an ongoing basis.</p>
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MRZ-S11 Minimum floor levels

<p>1. The <u>minimum floor level (finished floor) and ground level</u> for all <u>residential buildings, accessory buildings and structures</u> must be at least at the required freeboard for the 2% AEP flood extent for the <i>site</i> (including an allowance for climate change <u>using climate change scenario SSP5-8.5</u>).</p> <p>2. Access* to occupied <i>buildings and structures</i> must be above the 2% AEP flood extent.</p> <p>Advice Note: The required freeboard <u>minimum floor level</u> will be provided by Palmerston North City Council.</p>	<p>Matters of discretion where the standard is infringed:</p> <p>1. The <i>effect</i> on the <i>site</i> and on upstream and downstream properties of <u>minimum floor levels and ground levels</u>—which are below the required standards.</p>
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MRZ-S12 Front Façade Glazing

<p>1. Any <u>building residential unit</u> must meet the following minimum façade glazing requirements:</p> <table border="1" data-bbox="268 1283 935 1944"> <thead> <tr> <th data-bbox="268 1283 611 1406">Façade</th> <th data-bbox="611 1283 935 1406">Minimum glazing requirement</th> </tr> </thead> <tbody> <tr> <td data-bbox="268 1406 611 1529"><u>Street-facing</u> Front façade facing a street</td> <td data-bbox="611 1406 935 1529">20% glazing as windows and/or doors</td> </tr> <tr> <td data-bbox="268 1529 611 1944"><u>For any corner site or a site that has frontage to two streets</u></td> <td data-bbox="611 1529 935 1944"><u>One street facing facade 20% as windows and/or doors</u></td> </tr> <tr> <td data-bbox="268 1944 611 1944">Side boundary facing facade <u>Secondary frontage for a corner site*</u> OR side façade fronts street</td> <td data-bbox="611 1944 935 1944"><u>The other street facing facade 10% as windows and/or doors</u> 10% glazing as windows and/or doors</td> </tr> </tbody> </table>	Façade	Minimum glazing requirement	<u>Street-facing</u> Front façade facing a street	20% glazing as windows and/or doors	<u>For any corner site or a site that has frontage to two streets</u>	<u>One street facing facade 20% as windows and/or doors</u>	Side boundary facing facade <u>Secondary frontage for a corner site*</u> OR side façade fronts street	<u>The other street facing facade 10% as windows and/or doors</u> 10% glazing as windows and/or doors	<p>Matters of discretion where the standard is infringed:</p> <p>1. The contribution of windows on a front façade or secondary or side façade to passive surveillance, safety and visual interest.</p>
Façade	Minimum glazing requirement								
<u>Street-facing</u> Front façade facing a street	20% glazing as windows and/or doors								
<u>For any corner site or a site that has frontage to two streets</u>	<u>One street facing facade 20% as windows and/or doors</u>								
Side boundary facing facade <u>Secondary frontage for a corner site*</u> OR side façade fronts street	<u>The other street facing facade 10% as windows and/or doors</u> 10% glazing as windows and/or doors								

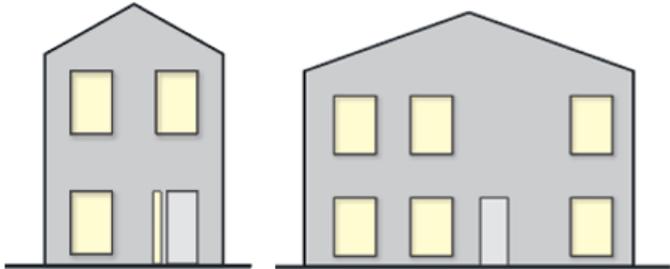
Where street-facing façade primary frontage includes a garage door	12.5% as windows and/or doors
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This standard does not apply:

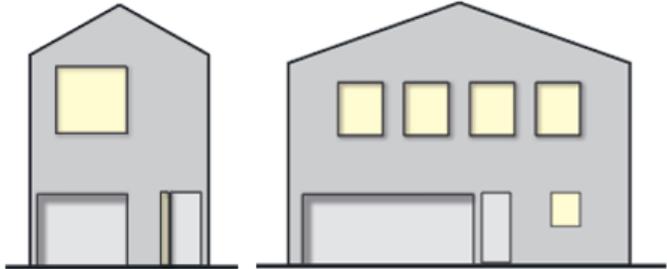
- To residential units located 15 metres or more from the ~~primary~~ street frontage.

See MRZ-Figure 4.3 which demonstrates ~~the front façade~~ glazing requirements ~~and exceptions.~~

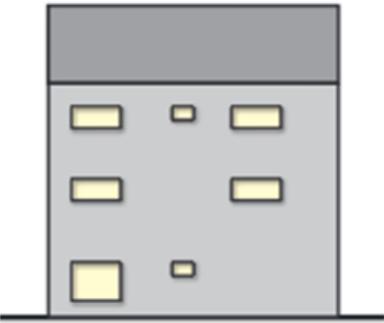
MRZ-Figure 24 Diagram showing front façade glazing requirements



Street-facing façade with 20% glazing, for both narrow and wide sites



Street facing façade including garage with 12.5% glazing, for both narrow and wide sites



Secondary frontage or side façade facing street with 10% glazing.

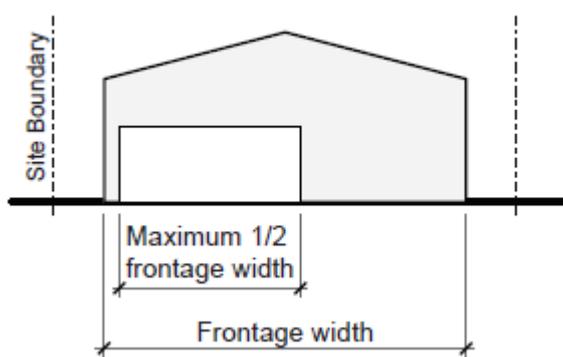
MRZ-S13 Front door orientation

<p>1. The front door of any <i>residential unit, papakāinga*</i> or <i>community house*</i> located adjacent to a public road must either be:</p> <ol style="list-style-type: none"> located on the front façade if this faces the road; or if located on a side façade facing an access way, be located no more than 2/3 along this façade 	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> The contribution made by a front door to passive surveillance, safety and visual interest.
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MRZ-S14 Garages

<ol style="list-style-type: none"> Any garage door facing a public road or an access way must not occupy more than half the width of the <i>building</i> façade to which it relates. Multiple garages facing a public road or access way must not comprise more than half the width of the frontage for that <i>site</i>. <p>See MRZ-Figure 75 below which demonstrates the standard requirements for garages on a <i>site</i>.</p>	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> The visual dominance effect of garage(s) on the streetscape or access way.
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MRZ-Figure 75 Diagram showing required garage standards



MRZ-S15 On-site carparking - location

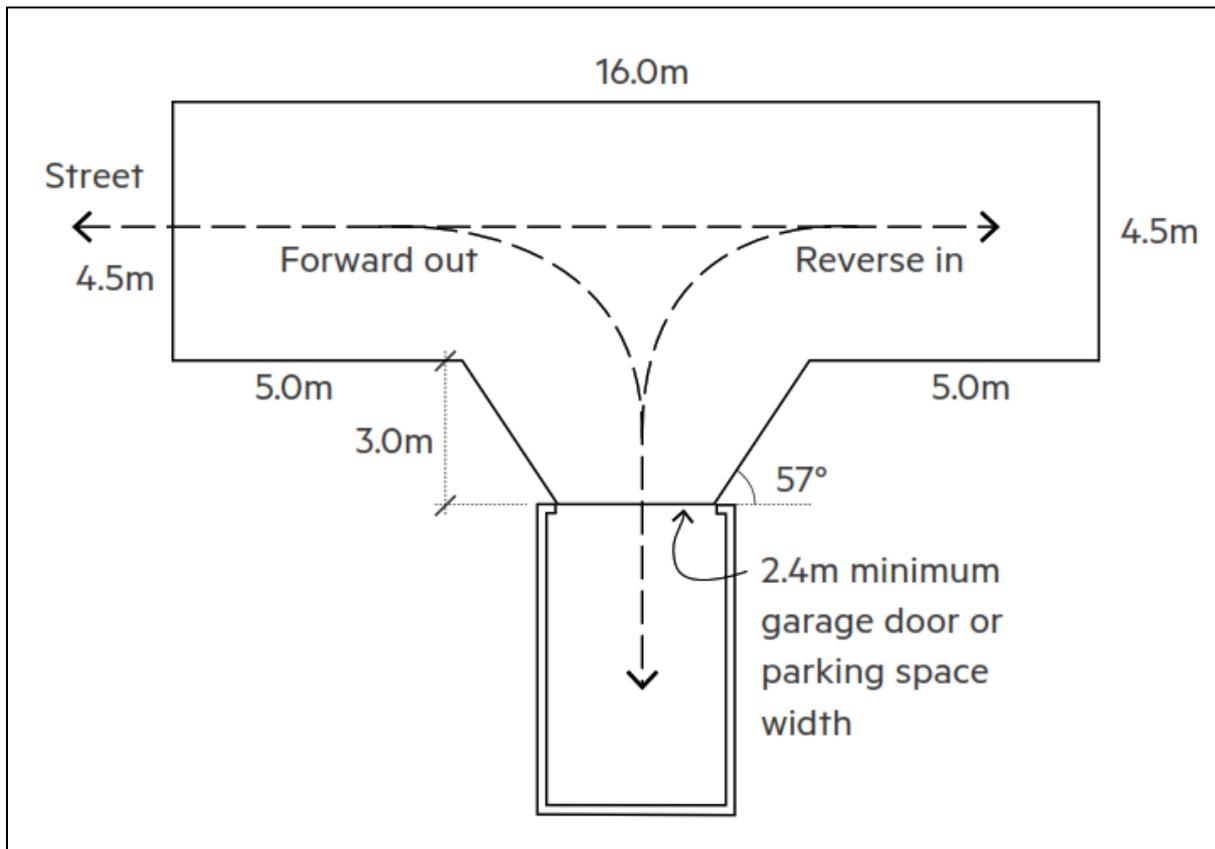
<ol style="list-style-type: none"> Any on-site carparking within 6 metres of a boundary adjoining a public road: <ol style="list-style-type: none"> must not comprise more than 50% of the width of the <i>residential unit's</i> façade to which it relates; 	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> Safety effects on the land transport
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<p>b. must be located directly in front of the garage if the residential unit to which it relates has a street-facing garage door; and</p> <p>c. must be a minimum of 5.5 metres in length.</p>	<p>network and pedestrians.</p> <p>2. Effects on the safe internal site circulation and manoeuvring areas, including for pedestrians;</p>
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MRZ-S16 Vehicle Crossings

<p>1. The maximum number of vehicle crossings per site is 1 per 8m of total frontage, with no more than two accesses* per site.</p> <p>2. <u>Where a vehicle access leg* or vehicle access strip* crosses a footpath, a pedestrian visibility splay in the form of a sight triangle measuring 2.0m along the front boundary by 2.5m along the access must be provided on each side of the access (See MRZ-Figure 6).</u></p> <p><u>The sight triangle must be kept clear of obstructions to visibility:</u></p> <p>a. <u>planting within the sight triangle shall be kept to no more than 1.1m high; and</u></p> <p>b. <u>any fence or standalone wall within the sight triangle must be no more than 1.1m high.</u></p> <p><u>Where a vehicle access leg* or vehicle access strip provides access to two or more properties, a 75mm (7.5cm) high speed hump, located 1.0m from the property boundary, must be installed on the vehicle access strip* or vehicle access leg* where the sight triangle requirement cannot be achieved because of an existing fence on an adjoining property.</u></p> <p><u>MRZ-S16(2) does not apply:</u></p> <ul style="list-style-type: none"> • <u>To an existing fence on an adjoining property where access is to a single dwelling.</u> <p>3. <u>The location of any associated new or altered vehicle crossing must not require:</u></p> <p>a. <u>the removal of any tree planted on any public road, or</u></p>	<p>Matters of discretion where the standard <u>MRZ-S16(1) or (2)</u> is infringed:</p> <p>1. Safety effects on the land transport network and pedestrians.</p> <p><u>Matters of discretion where MRZ-S16(3) is infringed:</u></p> <p>2. <u>Health and maturity of the tree;</u></p> <p>3. <u>Provision of a replacement tree; and</u></p> <p>4. <u>Feasibility of alternative access* arrangements.</u></p>
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<p>b. <u>modification, excavation or construction within the area directly beneath the dripline* of the tree.</u></p>	
<p><u>MRZ-Figure 6</u></p>	
<p>MRZ-S17 On-site vehicle manoeuvring</p>	
<p>1. On-site vehicle manoeuvring must comply with MRZ-Figure <u>78</u> where there is a side-entry garage or parking space.</p> <p><u>MRZ-S17 does not apply to:</u></p> <ul style="list-style-type: none"> • <u>A side-entry garage or parking space where vehicle access is from a Local Road and the access serves a single dwelling only.</u> <p><u>Advice Note:</u> <u>This diagram accommodates an 85th percentile single movement swept path as per AS/NZS 2890.1 The Australian/New Zealand Standard Parking Facilities – Part 1- Off-street Car Parking</u></p>	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> 1. Safety effects on the land transport network and pedestrians. 2. Effects on the safe internal site circulation and manoeuvring areas, including for pedestrians;
<p>MRZ-Figure <u>78</u> Diagram showing required on-site vehicle manoeuvring requirement</p>	



MRZ-S18 On-site bicycle parking

1. Bicycle parking must be provided for all residential units at a minimum rate of 1 bicycle park per residential unit;
2. Each bicycle park must be able to accommodate a 90%tile bicycle, as defined in Appendix 20D – Section 20.
3. Bicycle parking must be located in a garage, yard, shed or secure communal area; provided either within each residential unit or within a secure structure (which may be communal);
4. Any external bicycle parking must not impede pedestrian thoroughfares, accessible routes*, vehicle parking, circulation or manoeuvring areas; and
5. The number of bicycle parks provided within a communal structure must meet or exceed the number of residential units on-site.

Matters of discretion where the standard is infringed:

1. *Effect* of reduced bicycle parking on supporting mode shift
2. *Effects* on the safe internal site circulation and manoeuvring areas, including for pedestrians

MRZ-S19 On-site rubbish and recycling storage and collection

<ol style="list-style-type: none"> 1. Each <i>residential unit</i> must have access to a screened rubbish and recycling storage area (which may be individual or communal) with a minimum area of 1.5m² and a minimum dimension of 1m in any direction which is sized to accommodate one 240l wheelie bin and one recycling crate. 2. Communal rubbish and recycling storage areas must be screened or located so as not to be visible from a public road, shared accessway or communal area. 3. <u>Where on-site rubbish and recycling collection is used:</u> <ol style="list-style-type: none"> a. <u>the storage area must be accessible for the collection vehicle to service the rubbish storage area and</u> b. <u>where the site fronts an Arterial or Collector Road, on-site turning for trucks is required.</u> 4. Where there are more than 20 <i>residential units</i> on one <i>site</i>, and the <i>site</i> fronts an Arterial or Collector Road, on-site turning for trucks is required. 	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> 1. Safety <i>effects</i> on the land transport network and pedestrians; 2. <i>Effects</i> on the safe internal <i>site</i> circulation and manoeuvring areas, including for pedestrians; and 3. Location, <u>accessibility</u>, and size of rubbish storage area.
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MRZ-S20 Fences and standalone walls

<ol style="list-style-type: none"> 1. Any fence or standalone wall, or combination of these <i>structures</i>, must not: <ol style="list-style-type: none"> a. Exceed a maximum <i>height</i> of 1.8 metres above <i>ground level</i>; or b. Obscure emergency or safety signage or obstruct access to emergency panels, hydrants, shut-off valves, or other emergency response facilities. 2. On a front boundary with a public road any fence or standalone wall, or combination of these <i>structures</i>, must not <u>exceed:</u> <ol style="list-style-type: none"> a. <u>1.1m above ground level for 2/3 of the frontage width; and</u> b. <u>1.8m above ground level for the remaining 1/3 of the frontage width.</u> <p style="text-align: center;">Exceed a maximum height of 1.8 metres above ground level; and</p> <ol style="list-style-type: none"> a. For any part of a fence or standalone wall above 1.1 metres in height, at least 2/3 of the fence must be of open construction. 	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> 1. The visual dominance <i>effect</i> of the fence on the streetscape; 2. Dominance <i>effects</i> on adjoining residential <i>sites</i>; and 3. Safety <i>effects</i> on the land transport network and pedestrians.
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<p>Except that:</p> <ul style="list-style-type: none"> Where a fence is erected on the <i>road</i> frontage of a <i>corner site</i>*, the requirements of MRZ-S16<u>20</u>.2 only apply to one road frontage. <p>Advice Note: Open areas exclude any surface of the fence which is solid, but may include wire mesh, or wrought iron or similar elements with a facing edge not thicker than 12mm and spaced at not less than 80mm centres.</p> <p>3. Within 2.5 metres of any boundary adjoining a public road, any fence or standalone wall on a side boundary next to a vehicle access leg* must be no more than 1.1 metre high.</p> <p>MRZ-S16<u>20</u> does not apply to existing fencing within a <i>site</i>.</p> <p><u>Refer to MRZ-S16 for requirements for pedestrian visibility splays for vehicle access legs* or vehicle access strips*.</u></p>	
<p>MRZ-S21 Mechanical Ventilation</p>	
<ol style="list-style-type: none"> Any mechanical ventilation system must: <ol style="list-style-type: none"> Be adjustable by the occupant to control the ventilation rate in increments up to a high air flow setting that provides at least 1 air change per hour; Provide relieve <u>relief</u> for equivalent volumes of spill air; Provides cooling and heating that is controllable by the occupant, which can maintain the inside temperature between 18°C and 25°C; and Not generate more than 35 dB $L_{Aeq(30s)}$ when measured 1 metre away from any grille or diffuser. 	<p>Matters of discretion if the standard is infringed:</p> <ol style="list-style-type: none"> The extent of non-compliance with the standard Effects on the health and wellbeing of people Reverse sensitivity effects on the rail or state highway network

Appendix 3 – Redline version of Chapter 7B – Subdivision in the MRZ

SUBDIVISION – MEDIUM DENSITY RESIDENTIAL ZONE

The purpose of this chapter is to assist the Council to carry out its functions under the Act relating to the control of subdivision in the Medium Density Residential Zone.

The control of subdivision of land is one of the functions of the City Council under Section 31 of the Resource Management Act 1991. Subdivision is the process of dividing land or a building into further titles or changing the location of an existing boundary. Subdivision includes all forms of division of an allotment, including cross lease, unit title and company lease and it enables the separate ownership of land and the registration of interests in land.

Subdivision to create separate titles will generally require physical development work, including the clearance of vegetation, the carrying out of earthworks, the construction of roads and vehicle accesses and the installation of utility services.

Whilst subdivision controls in the Medium Density Residential Zone are aimed at increasing housing supply and choice, they are also focused on ensuring adverse effects on people, communities and the wider environment can be appropriately managed. Well designed and connected subdivision can support a more resilient urban form for Palmerston North city, including by increasing neighbourhood connectivity, supporting mode shift, increasing climate change resilience, reducing greenhouse gas emissions and making homes and neighbourhoods more energy efficient.

The Council expects combined subdivision and land use resource consent applications, to enable a comprehensive understanding of the pattern, scale and density of development in the zone. Where subdivision occurs before land development, it is important that each allotment is capable of containing a residential unit which complies with the permitted activity standards for the zone. Each allotment must also be serviced by essential services such as water, telecommunications and electricity, and be connected to the Council's wastewater and stormwater networks.

In addition to the rules in this chapter, the use of the subdivided land must comply with the relevant controls for the Medium Density Residential Zone. Section 5.5 of the District Plan contains the information requirements that need to be submitted with each subdivision application.

Objectives

SUB-MRZ-O1 Efficient land development

Subdivision in the Medium Density Residential Zone creates allotments and efficient patterns of land development that:

1. Enable medium density residential development which is compatible with the purpose and planned form for the zone;
2. Maintain the safe and efficient functioning of the transport network;
3. Are serviced by water, wastewater and stormwater infrastructure that has sufficient capacity to accommodate the proposed development; and

4. Avoid the subdivision of land where there is significant risk from natural hazards.

Policies

SUB-MRZ-P1 – Subdivision design and layout

Provide for subdivision designs and layouts that make efficient use of renewable energy and other natural and physical resources, and deliver well-connected, resilient communities, including development patterns that:

1. Optimise solar gain and manage solar access;
2. Incorporate *water sensitive design*;
3. Manage stormwater effectively and efficiently;
4. Support walking, cycling and public transport opportunities and enhance neighbourhood and network connectivity and safety
5. Result in safe and adequate access from the transport network to each allotment;
6. Are adaptable to the effects of climate change;
7. Are designed using crime prevention through environmental design principles;
8. Achieve high quality landscape outcomes, including encouraging the retention and integration of mature trees and native vegetation that contribute positively to an area's visual amenity; and
9. Orient ~~lot~~ allotment frontages towards streets and other public spaces to create quality streetscapes and where possible combine accessways to rear allotments ~~lots~~.

SUB-MRZ-P2 Integration and layout of subdivision and development

Provide for the efficient integration and layout of subdivision and associated development by:

1. Encouraging joint applications for subdivision and land use;
2. Enabling subdivision around development that has already been lawfully established; and
3. Ensuring standalone subdivision proposals provide allotments where it can be demonstrated that a residential unit can be contained within the allotment which complies with the relevant permitted activity standards.

SUB-MRZ-P3 Subdivision of land affected by natural hazards

Take a risk-based approach to the subdivision of *land* affected by *natural hazards* so that:

- a. new ~~or exacerbation of existing~~ natural hazards and/or exacerbation of existing natural hazards is avoided where practicable and
- b. appropriate mitigation measures are implemented during subdivision and development* ~~to manage natural hazard risk are in place prior to development.~~

SUB-MRZ-P4 – Subdivision in the Stormwater Overlay

Avoid *subdivision* 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 **including an allowance for climate change using climate change scenario SSP5-8.5**;
3. **identifies** the on-site and off-site effects of the proposed subdivision on people, property and the environment;
4. **recommends** mitigation measures to remedy or mitigate the on- and off-site effects of the subdivision, **including consideration of water sensitive design**; and
5. demonstrates that the on- and off-site adverse effects associated with subdivision will appropriately be mitigated.

SUB-MRZ-P5 Servicing

Require all allotments created by a subdivision to be adequately serviced by *essential services*.

RULES

Note: There may be a number of provisions that apply to an activity, *building, structure* or *site*. Resource consent may therefore be required under rules in this section as well as other sections of the District Plan. For example, rules relating to:

- Signs, noise, earthworks - Section 6: General Rules
- Land use – Section 10A: Medium Density Residential Zone
- Scheduled trees and heritage buildings – Section 17: Cultural and natural heritage
- Access and parking – Section 20: Land Transport; and
- Natural hazards – Section 22: Natural hazards.

The information requirements for a subdivision consent can be found in Chapter 5.

SUB-MRZ-R1 Subdivision in the Medium Density Residential Zone

1. Activity status: **Controlled**

Where:

~~α. Where the site is not located within the Stormwater Overlay; and~~

α. Compliance with the following standards is achieved:

- i. Standards ~~MRZ-S12 – MRZ-S7, MRZ-S9 – MRZ-S10, MRZ-S16~~ – MRZ-S20, for ~~allotments lots~~ created with an existing *dwelling**;
- ii. SUB-MRZ-S1 – Access*;
- iii. SUB-MRZ-S2 – Vehicle crossings;

- iv. SUB-MRZ-S3 – *Essential services**;
- v. SUB-MRZ-S4 – *Street trees*;
- b. *Accesses** comply with R20.4.2
 - i. 20.4.2(a) (i)-(v);
 - ii. 20.4.2(a) (vi) (b-j);
 - iii. 20.4.2(a) (vii)-(viii); and
- c. *Earthworks* comply with R6.3.6.1 (b).
- d. MRZ-R24 - *Stormwater treatment for parking and manoeuvring areas, and access ways*

*Council's** control is restricted to:

1. The matter(s) of control for any infringed standard in SUB-MRZ-R1.1 (b)-(e);
2. The provision of practical, physical and legal *access** from each *allotment* directly to a formed legal road or by a registered right of way;
3. *Subdivision* design and layout and the size, shape and arrangement of proposed *allotments*;
4. The *effect* of *earthworks* on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation; and
5. Whether the *subdivision* design and layout meets the requirements of the *Council's** Engineering Standards for Land Development.

Advice Note:

Service connections to the public *stormwater* network must comply with the Palmerston North Stormwater Bylaw 2022, service connections to the public *wastewater* network must comply with the Palmerston North Wastewater Bylaw 2019 and service connections to the public water supply network must comply with the Palmerston North Water Supply Bylaw 2024.

Notification:

An application under this rule is precluded from being publicly notified or limited notified in accordance with section 95A or section 95B of the Resource Management Act 1991 where the *subdivision* is associated with *residential units* or *papakāinga** that are permitted under MRZ-R7.

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991 if the *subdivision* is associated with an application for the construction of 1-3 *residential units* or *papakāinga** that do not comply with MRZ-R7.

~~2. Activity status: Restricted Discretionary~~

~~Where:~~

~~a. Compliance with SUB-MRZ-R1.1(a) is not achieved.~~

~~Council's* discretion is restricted to:~~

- ~~1. The effect of earthworks on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation;~~
- ~~2. Setting of minimum floor levels;~~
- ~~3. Setting of maximum impervious surface area;~~
- ~~4. Subdivision design and layout and the size, shape and arrangement of proposed allotments;~~
- ~~5. 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~~
- ~~6. Whether the subdivision design and layout meets the requirements of the Council's* Engineering Standards for Land Development; and~~
- ~~7. The relevant matters in SUB-MRZ-P3 and SUB-MRZ-P4.~~

Advice Note:

~~Service connections to the public stormwater network must comply with the Palmerston North Stormwater Bylaw 2022, service connections to the public wastewater network must comply with the Palmerston North Wastewater Bylaw 2019 and service connections to the public water supply network must comply with the Palmerston North Water Supply Bylaw 2024.~~

Notification:

~~An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.~~

23. Activity status: **Restricted Discretionary**

Where:

- a. Compliance with one or more of the standards in SUB-MRZ-R1.1(~~qb~~)-(d) is not achieved.

Council's* discretion is restricted to:

1. The matter(s) of discretion for any infringed standard in ~~MRZ-S1-MRZ-S20~~ MRZ-S12 – MRZ-S7, MRZ-S9 – MRZ-S10, MRZ-S16;
2. The matter(s) of ~~control~~ discretion for any infringed standard in SUB-MRZ-R1.1(~~qb~~)~~(ii-iii)~~-(v) and (b)-(d);
3. *Subdivision design and layout and the size, shape and arrangement of proposed allotments;*
4. The safe and efficient operation of the roading network;
5. *The effect of earthworks on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation; and*
6. The relevant matters in SUB-MRZ-P1, SUB-MRZ-P2, SUB-MRZ-P3, ~~SUB-MRZ-P4~~ and SUB-MRZ-P5.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

An application under this rule is precluded from being limited notified in accordance with section 95B of the Resource Management Act 1991 except in relation to the width of a *site access** and *earthworks*.

SUB-MRZ-R1A Subdivision within the Stormwater Overlay

1. Activity status: **Restricted Discretionary**

Council's* discretion is restricted to:

- a. Standards MRZ-S12 – MRZ-S7, MRZ-S9 – MRZ-S10, MRZ-S16 – MRZ-S20, for allotments lots created with an existing dwelling*;
- b. The effect of earthworks on on-site and off-site flooding and overland flow paths, hazard risk and erosion and sedimentation;
- c. Setting of minimum floor levels;
- d. Setting of maximum impervious surface area;
- e. Subdivision design and layout and the size, shape and arrangement of proposed allotments;
- f. 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-wide Stormwater Strategy
- g. Whether the subdivision design and layout meet the requirements of the Council's* Engineering Standards for Land Development; and
- h. The relevant matters in SUB-MRZ-P1, SUB-MRZ-P2, SUB-MRZ-P3, SUB-MRZ-P4 and SUB-MRZ-P5.

Advice Note:

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.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

SUB-MRZ-R2 Subdivision that creates any vacant allotment

1. Activity status: **Controlled**

Where:

- b. Compliance with the following standards is achieved:
 - i. Standard MRZ-S11,

- ii. SUB-MRZ-S1 – Access*;
- iii. SUB-MRZ-S2 – Vehicle crossings;
- iv. SUB-MRZ-S3 – Essential services*;
- v. SUB-MRZ-S4 – Street trees;
- c. Accesses* comply with R20.4.2
 - i. 20.4.2(a)(i)-(v);
 - ii. 20.4.2(a)(vi)(b-j);
 - iii. 20.4.2(a)(vii)-(viii); and
- d. Earthworks comply with R6.3.6.1(b).
- e. Where it is demonstrated that the vacant allotment/s can comply with MRZ-S4 – MRZ-S5(1) and (2), MRZ-S7, MRZS9 and MRZ-S16 – MRZ-S17;

Council's* control is restricted to:

1. The provision of practical, physical and legal access* from each *allotment* directly to a formed legal road or by a registered right of way;
2. *Subdivision* design and layout and the size, shape and arrangement of proposed *allotments*;
3. The *effect* of earthworks on flooding and overland flow paths, hazard risk and erosion and sedimentation;
4. Whether the *subdivision* design and layout meets the requirements of the Council's* Engineering Standards for Land Development; and
5. Whether a residential unit can be contained within the allotment which complies with MRZ-S4 – MRZ-S5(1) and (2), MRZ-S7, MRZS9 and MRZ-S16 – MRZ-S17;
6. The relevant matters in SUB-MRZ-P2 (3).

Advice Note:

Service connections to the public *stormwater* network must comply with the Palmerston North Stormwater Bylaw 2022, service connections to the public *wastewater* network must comply with the Palmerston North Wastewater Bylaw 2019 and service connections to the public water supply network must comply with the Palmerston North Water Supply Bylaw 2024.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act.

SUB-MRZ-R3 Cross lease, company lease, boundary adjustment or unit title subdivision around existing buildings or buildings under construction

1. Activity status: **Controlled**

Where:
 - a. There are no new undeveloped separately disposable allotments~~lot~~, cross leases~~s~~, company areas~~s~~ or any units~~s~~ created; and
 - b. Compliance with the following standards is achieved:
 - i. SUB-MRZ-S1 – Access;

- ii. SUB-MRZ-S2 – Vehicle crossings;
- iii. SUB-MRZ-S3 – Essential services; and
- iv. SUB-MRZ-S4 – Street trees.

Council's control is restricted to:

- 1. The matter(s) of control for any infringed standard in SUB-MRZ-R1.1(b);
- 2. Subdivision design and layout and the size, shape and arrangement of proposed allotments; and
- 3. The design and location of any site access.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A or limited notified in accordance with section 95B of the Resource Management Act 1991.

SUB-MRZ-R4 Subdivision involving construction of a road

- 1. Activity status: **Restricted Discretionary**

Council's discretion is restricted to:

- 1. Connectivity with the surrounding road network;
- 2. Safe and efficient operation of the roading network;
- 3. Location and design of any site access;
- 4. Integration with essential services; and
- 5. Natural hazards.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A or limited notified in accordance with section 95B of the Resource Management Act 1991.

SUB-MRZ-R5 All other subdivision

- 1. Activity status: **Discretionary**

Where:

- 1. The subdivision is not listed as a Controlled Activity or a Restricted Discretionary Activity in Section 7B of the District Plan; and
- 2. Subdivision occurs outside the Air Noise Contour identified on Map 10.6.6.1; or
- 3. Subdivision within the Air Noise Contour identified on Map 10.6.6.1 is for the purpose of accommodating any network utility or for a boundary adjustment.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

2. Activity status: **Non-complying**

Where:

a. The subdivision occurs inside the Air Noise Contour identified on Map 10.6.6.1.

Notification:

An application under this rule is precluded from being publicly notified in accordance with section 95A of the Resource Management Act 1991.

SUBDIVISION IN THE MEDIUM RESIDENTIAL ZONE - STANDARDS

SUB-MRZ-S1 - Access

1. Each *allotment* must have practical, physical and legal access to a public road ~~by way of either:~~
2. Access* to a rear allotment must be
 - a. an access *leg* at least 3 metres wide forming part of the allotment lot; or
 - b. a shared access consisting of ~~up to six access strips~~ lying adjacent to one another ~~and giving access to no more than five other allotment lots~~, and in respect of which reciprocal rights-of-way are granted or reserved; or
 - c. an access *strip* held in common ownership with the rear allotment and any other allotments it provides access to ~~up to five other allotments~~; or
 - d. any right-of-way running with and appurtenant to the land in which the allotment is comprised.
3. No two or more *access strips* to allotments may lie adjacent to one another unless easements are granted over each *access strip* in a manner which enables joint use of a single driveway, and a single point of access to a public road.

Matters of discretion control where the standard is infringed:

1. Connectivity with the surrounding road network;
2. Whether any alternative access arrangement is located, formed and constructed in a manner that is suited to the development or activity it serves;
3. Safe and efficient operation of the roading network; and
4. Location and design of any site access.

Except that SUB-MRZ-S1 does not apply to

<p>allotments for:</p> <ul style="list-style-type: none"> • Infrastructure to vest in Palmerston North City Council; • Network utilities; or • Access <i>strips</i> serving other allotments. 	
<p>SUB-MRZ-S2 Vehicle Crossings</p>	
<p>1. The maximum number of vehicle crossings per <i>site</i> is 1 per 8m of total frontage, with no more than two accesses per <i>site</i>.</p>	<p>Matters of discretion where the standard is infringed:</p> <ol style="list-style-type: none"> 1. Safety <i>effects</i> on the land transport network and pedestrians.
<p>SUB-MRZ-S3 Essential Services</p>	
<ol style="list-style-type: none"> 1. All <i>essential services</i> must be available for connection within 30 metres of the nearest point of the land being subdivided. 2. All new <i>allotments</i> must have sewer, stormwater and water supply services that are connected to <i>essential services</i>. 3. All new <i>essential services</i> proposed in a <i>subdivision</i> must be located in public service corridors either where they are to vest in Council or service in excess of six <i>allotments</i>. 	<p>Matters of discretion control where the standard is infringed:</p> <ol style="list-style-type: none"> 1. The layout and design of services and service connections to essential services.
<p>SUB-MRZ-S4 Street Trees</p>	
<ol style="list-style-type: none"> 1. The layout of the subdivision and the location of any associated new or altered vehicle crossing does not require: <ol style="list-style-type: none"> i. the removal of any tree planted on any public road, or ii. modification, excavation or construction within the area directly beneath the dripline of the tree. 	<p>Matters of discretion control the standard is infringed:</p> <ol style="list-style-type: none"> 1. Health and maturity of the tree; 2. Provision of a replacement tree; and 3. Feasibility of alternative access arrangements.

Appendix 4 – Redline version of Chapter 4A – Definitions in the MRZ

4A. MEDIUM DENSITY RESIDENTIAL ZONE DEFINITIONS

NOTE TO PLAN USERS

A glossary of Māori words and terms is contained in Section 3 of this Plan.

In the Medium Density Residential Zone, unless the term is denoted with an * (representing a definition in Section 4 of the District Plan) or the context otherwise requires it the following definitions apply:

Accessory Building	means a detached building, the use of which is ancillary to the use of any building, buildings or activity that is or could be lawfully established on the same site, but does not include any minor residential unit.
Allotment	<p>has the same meaning as in section 218 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 10px;"> <p>(2) In this Act, the term allotment means—</p> <ul style="list-style-type: none"> (a) any parcel of land under the Land Transfer Act 2017 that is a continuous area and whose boundaries are shown separately on a survey plan, whether or not— <ul style="list-style-type: none"> (i) the subdivision shown on the survey plan has been allowed, or subdivision approval has been granted, under another Act; or (ii) a subdivision consent for the subdivision shown on the survey plan has been granted under this Act; or (b) any parcel of land or building or part of a building that is shown or identified separately— <ul style="list-style-type: none"> (i) on a survey plan; or (ii) on a licence within the meaning of subpart 6 of Part 3 of the Land Transfer Act 2017; or (c) any unit on a unit plan; or (d) any parcel of land not subject to the Land Transfer Act 2017. <p>(3) For the purposes of subsection (2), an allotment that is—</p> </div>

	<p>(a) subject to the Land Transfer Act 2017 and is comprised in 1 record of title or for which 1 record of title could be issued under that Act; or</p> <p>(b) not subject to that Act and was acquired by its owner under 1 instrument of conveyance—</p> <p>shall be deemed to be a continuous area of land notwithstanding that part of it is physically separated from any other part by a road or in any other manner whatsoever, unless the division of the allotment into such parts has been allowed by a subdivision consent granted under this Act or by a subdivisional approval under any former enactment relating to the subdivision of land.</p> <p>(4) For the purposes of subsection (2), the balance of any land from which any allotment is being or has been subdivided is deemed to be an allotment.</p>	
Amenity values	<p>Has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <p>Means those natural or physical qualities and characteristics of an area that contribute to people's appreciation of its pleasantness, aesthetic coherence, and cultural and recreational attributes</p>	
Ancestral Land	<p>means:</p> <p>(a) 'Maori Land' as defined under Te Ture Whenua Maori Act 1993;</p> <p>(b) Land returned via Treaty Settlement Claims process;</p> <p>(c) Land procured via Treaty Settlement Claims process; or</p> <p>(d) 'General Land owned by Maori', as defined under Te Ture Whenua Maori Act 1993.</p>	
Ancillary activity	<p>means an activity that supports and is subsidiary to a primary activity.</p>	
Bed	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <p>means—</p> <p>(a) in relation to any river—</p> <p>(i) for the purposes of esplanade reserves, esplanade strips, and subdivision, the space of land which the waters of the river cover at its annual fullest flow without overtopping its banks;</p> <p>(ii) in all other cases, the space of land which the waters of the river cover at its fullest flow without overtopping its banks; and</p>	

	<p>(b) in relation to any lake, except a lake controlled by artificial means,—</p> <p>(i) for the purposes of esplanade reserves, esplanade strips, and subdivision, the space of land which the waters of the lake cover at its annual highest level without exceeding its margin:</p> <p>(ii) in all other cases, the space of land which the waters of the lake cover at its highest level without exceeding its margin; and</p> <p>(c) in relation to any lake controlled by artificial means, the space of land which the waters of the lake cover at its maximum permitted operating level; and</p> <p>(d) in relation to the sea, the submarine areas covered by the internal waters and the territorial sea.</p>	
Boundary adjustment	means a subdivision that alters the existing boundaries between adjoining allotments, without altering the number of allotments.	
Building	<p>means a temporary or permanent movable or immovable physical construction that is:</p> <p>(a) partially or fully roofed; and</p> <p>(b) fixed or located on or in land; but excludes any motorised vehicle or other mode of transport that could be moved under its own power.</p>	
Building coverage	means the percentage of the net site area covered by the building footprint.	
Building footprint	means, in relation to building coverage, the total area of buildings at ground floor level together with the area of any section of any of those buildings that extends out beyond the ground floor level limits of the building and overhangs the ground.	
Commercial Activity	means any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices).	
Community Facility	Means land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare, or worship purposes. It includes provision for any ancillary activity that assists with the operation of the community facility.	
Contaminant	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px;"> <p>includes any substance (including gases, odorous compounds, liquids, solids, and micro-organisms) or energy (excluding noise) or heat, that either by itself or in combination with the same, similar, or other substances, energy, or heat—</p> <p>(a) when discharged into water, changes or is likely to change the physical, chemical, or biological condition of water; or</p> <p>(b) when discharged onto or into land or into air, changes or is likely to change the physical,</p> </div>	

	chemical, or biological condition of the land or air onto or into which it is discharged.
Cultivation	means the alteration or disturbance of land (or any matter constituting the land including soil, clay, sand and rock) for the purpose of sowing, growing or harvesting of pasture or crops.
<u>Development Infrastructure</u>	<p><u>has the same meaning as in Clause 1.4 of the National Policy Statement for Urban Development 2020 (set out in the box below)</u></p> <p><u>means the following, to the extent they are controlled by a local authority or council controlled organisation (as defined in section 6 of the Local Government Act 2002): network infrastructure for water supply, wastewater, or stormwater land transport (as defined in section 5 of the Land Transport Management Act 2003)</u></p>
Discharge	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <p>includes emit, deposit, and allow to escape.</p>
Drain	means any artificial watercourse designed, constructed, or used for the drainage of surface or subsurface water, but excludes artificial watercourses used for the conveyance of water for electricity generation, irrigation, or water supply purposes.
Drinking water	means water intended to be used for human consumption; and includes water intended to be used for food preparation, utensil washing, and oral or other personal hygiene.
Dust	means all non-combusted solid particulate matter that is suspended in the air, or has settled after being airborne. Dust may be derived from materials including rock, sand, cement, fertiliser, coal, soil, paint, animal products and wood.
<u>Dust nuisance</u>	<p><u>means the generation of dust resulting in visible evidence of suspended solids:</u></p> <p>a. <u>In the air beyond the site the dust is generated from; or</u></p> <p>b. <u>Traceable from a dust source settling on the ground, building or structure on a neighbouring site, or water.</u></p>
Earthworks	Means the alteration or disturbance of land, including by moving, removing, placing, blading, cutting, contouring, filling or excavation of earth (of any matter constituting the land including soil, clay, sand and rock); but excludes gardening, cultivation, and disturbance of land for the installation of fence post.
Educational Facility	means land or buildings used for teaching or training by child care services, schools, or tertiary education services, including any ancillary activities.
Effect	<p>has the same meaning as in section 3 of the RMA (as set out in the box below)</p> <p>includes—</p> <p>(a) any positive or adverse effect; and</p> <p>(b) any temporary or permanent effect; and</p> <p>(c) any past, present, or future effect; and</p>

	<p>(d) any cumulative effect which arises over time or in combination with other effects— regardless of the scale, intensity, duration, or frequency of the effect, and also includes—</p> <p>(e) any potential effect of high probability; and</p> <p>(f) any potential effect of low probability which has a high potential impact.</p>
Environment	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <p>includes—</p> <p>(a) ecosystems and their constituent parts, including people and communities; and</p> <p>(b) all natural and physical resources; and</p> <p>(c) amenity values; and</p> <p>(d) the social, economic, aesthetic, and cultural conditions which affect the matters stated in paragraphs (a) to (c) or which are affected by those matters.</p>
Esplanade reserve	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <p>means a reserve within the meaning of the Reserves Act 1977—</p> <p>(a) which is either—</p> <p>(i) a local purpose reserve within the meaning of section 23 of that Act, if vested in the territorial authority under section 239; or</p> <p>(ii) a reserve vested in the Crown or a regional council under section 237D; and</p> <p>(b) which is vested in the territorial authority, regional council, or the Crown for a purpose or purposes set out in section 229.</p>
Esplanade strip	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <p>means a strip of land created by the registration of an instrument in accordance with section 232 for a purpose or purposes set out in section 229.</p>
Greywater	<p>means liquid waste from domestic sources including sinks, basins, baths, showers and similar fixtures, but does not include sewage, or industrial and trade waste.</p>
Gross Floor Area	<p>means the sum of the total area of all floors of a building or buildings (including any void area in each of those floors, such as service shafts, liftwells or stairwells) measured:</p>

	<ul style="list-style-type: none"> (a) where there are exterior walls, from the exterior faces of those exterior walls; (b) where there are walls separating two buildings, from the centre lines of the walls separating the two buildings; (c) where a wall or walls are lacking (for example, a mezzanine floor) and the edge of the floor is discernible, from the edge of the floor.
Ground Level	<p>means:</p> <ul style="list-style-type: none"> (a) the actual finished surface level of the ground after the most recent subdivision that created at least one additional allotment was completed (when the record of title is created); (b) if the ground level cannot be identified under paragraph (a), the existing surface level of the ground; (c) if, in any case under paragraph (a) or (b), a retaining wall or retaining structure is located on the boundary, the level on the exterior surface of the retaining wall or retaining structure where it intersects the boundary.
Habitable Room	means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, office or other room specified in the Plan to be a similarly occupied room.
Hazardous substance	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 10px;"> <p>includes, but is not limited to, any substance defined in section 2 of the Hazardous Substances and New Organisms Act 1996 as a hazardous substance. The Hazardous Substances and New Organisms Act 1996 defines hazardous substances as meaning, unless expressly provided otherwise by regulations or an EPA notice, any substance—</p> <ul style="list-style-type: none"> (a) with 1 or more of the following intrinsic properties: <ul style="list-style-type: none"> (i) explosiveness: (ii) flammability: (iii) a capacity to oxidise: (iv) corrosiveness: (v) toxicity (including chronic toxicity): (vi) ecotoxicity, with or without bioaccumulation; <p style="text-align: center;">or</p> (b) which on contact with air or water (other than air or water where the temperature or pressure has been artificially increased or decreased) generates a substance with any 1 or more of the properties specified in paragraph (a). </div>
Height	means the vertical distance between a specified reference point and the highest part of any feature, structure or building above that point.
Height in Relation to Boundary	means the height of a structure, building or feature, relative to its distance from either the boundary of:

	<p>(a) a site; or</p> <p>(b) another specified reference point.</p>
Home Business	<p>means a commercial activity that is:</p> <p>(a) undertaken or operated by at least one resident of the site; and</p> <p>(b) incidental to the use of the site for a residential activity.</p>
Industrial and trade waste	<p>means liquid waste, with or without matter in suspension, from the receipt, manufacture or processing of materials as part of a commercial, industrial or trade process, but excludes sewage and greywater.</p>
<u>Infrastructure</u>	<p><u>has the same meaning as section 2 of the Resource Management Plan (set out in the box below)</u></p> <div style="border: 1px solid black; padding: 10px;"> <p>a) <u>pipelines that distribute or transmit natural or manufactured gas, petroleum, biofuel, or geothermal energy:</u></p> <p>b) <u>a network for the purpose of telecommunication as defined in section 5 of the Telecommunications Act 2001:</u></p> <p>c) <u>a network for the purpose of radiocommunication as defined in section 2(1) of the Radiocommunications Act 1989:</u></p> <p>d) <u>facilities for the generation of electricity, lines used or intended to be used to convey electricity, and support structures for lines used or intended to be used to convey electricity, excluding facilities, lines, and support structures if a person—</u></p> <p style="margin-left: 20px;">i) <u>uses them in connection with the generation of electricity for the person's use; and</u></p> <p style="margin-left: 20px;">ii) <u>does not use them to generate any electricity for supply to any other person:</u></p> <p>e) <u>a water supply distribution system, including a system for irrigation:</u></p> <p>f) <u>a drainage or sewerage system:</u></p> <p>g) <u>structures for transport on land by cycleways, rail, roads, walkways, or any other means:</u></p> <p>h) <u>facilities for the loading or unloading of cargo or passengers transported on land by any means:</u></p> <p>i) <u>an airport as defined in section 2 of the Airport Authorities Act 1966:</u></p> <p>j) <u>a navigation installation as defined in section 2 of the Civil Aviation Act 1990:</u></p> </div>

	<p>k) <u>facilities for the loading or unloading of cargo or passengers carried by sea, including a port related commercial undertaking as defined in section 2(1) of the Port Companies Act 1988:</u></p> <p>l) <u>anything described as a network utility operation in regulations made for the purposes of the definition of network utility operator in section 166.</u></p>
LAeq	has the same meaning as 'time-average A-weighted sound pressure level' in New Zealand Standard 6801:2008 Acoustics -Measurement of Environmental Sound.
Land	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 10px;"> <p>(a) includes land covered by water and the airspace above land; and</p> <p>(b) in a national environmental standard dealing with a regional council function under section 30 or a regional rule, does not include the bed of a means a strip of land created by the registration of an instrument in accordance with section 232 for a purpose or purposes set out in section 229. or river; and</p> <p>(c) in a national environmental standard dealing with a territorial authority function under section 31 or a district rule, includes the surface of water in a lake or river.</p> </div>
Main Living Area	means a living room, dining room or family room.
Minor residential unit	means a self-contained residential unit that is ancillary to the principal residential unit, and is held in common ownership with the principal residential unit on the same site.
Natural and physical resources	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px;"> <p>Includes land, water, air, soil, minerals, and energy, all forms of plants and animals (whether native to New Zealand or introduced), and all structures.</p> </div>
Natural hazard	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px;"> <p>means any atmospheric or earth or water related occurrence (including earthquake, tsunami, erosion, volcanic and geothermal activity, landslip, subsidence, sedimentation, wind, drought, fire, or flooding) the action of which adversely affects or may adversely affect human life, property, or other aspects of the environment.</p> </div>
Net Site Area	<p>means the total area of the site, but excludes:</p> <p>(a) any part of the site that provides legal access to another site;</p> <p>(b) any part of a rear site that provides legal access to that site;</p> <p>(c) any part of the site subject to a designation that may be taken or acquired under the Public Works Act 1981.</p>

Network utility operator	<p>has the same meaning as in s166 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 10px;"> <p>means a person who—</p> <ul style="list-style-type: none"> (a) undertakes or proposes to undertake the distribution or transmission by pipeline of natural or manufactured gas, petroleum, biofuel, or geothermal energy; or (b) operates or proposes to operate a network for the purpose of— <ul style="list-style-type: none"> (i) telecommunication as defined in section 5 of the Telecommunications Act 2001; or (ii) radio communication as defined in section 2(1) of the Radio Communications Act 1989; or (c) is an electricity operator or electricity distributor as defined in section 2 of the Electricity Act 1992 for the purpose of line function services as defined in that section; or (d) undertakes or proposes to undertake the distribution of water for supply (including irrigation); or (e) undertakes or proposes to undertake a drainage or sewerage system; or (f) constructs, operates, or proposes to construct or operate, a road or railway line; or (g) is an airport authority as defined by the Airport Authorities Act 1966 for the purposes of operating an airport as defined by that Act; or (h) is a provider of any approach control service within the meaning of the Civil Aviation Act 1990; or (i) undertakes or proposes to undertake a project or work prescribed as a network utility operation for the purposes of this definition by regulations made under this Act,— <p>and the words network utility operation have a corresponding meaning.</p> </div>
Noise	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 5px;"> <p>Includes vibration.</p> </div>
Outdoor Living Space	<p>means an area of open space for the use of the occupants of the residential unit or units to which the space is allocated.</p>
Rail Corridor	<p>designation boundary - site #3 - maps 9, 10 and 14 in the DP District Plan.</p>

Residential Activity	means the use of land and building(s) for people's living accommodation.
Residential Unit	means a building(s) or part of a building that is used for a residential activity exclusively by one household, and must include sleeping, cooking, bathing and toilet facilities.
Retirement village	means a managed comprehensive residential complex or facilities used to provide residential accommodation for people who are retired and any spouses or partners of such people. It may also include any of the following for residents within the complex: recreation, leisure, supported residential care, welfare and medical facilities (inclusive of hospital care) and other non-residential activities.
<u>Reverse Sensitivity Effects</u>	<u>means the vulnerability of an existing lawfully established activity to other activities in the vicinity which are sensitive to adverse environmental effects that may be generated by such existing activity, thereby creating the potential for the operation of such existing activity to be constrained.</u>
Road	<p>has the same meaning as in section 2 of the RMA (as set out in the box below)</p> <div style="border: 1px solid black; padding: 10px;"> <p>has the same meaning as in section 315 of the Local Government Act 1974; and includes a motorway as defined in section 2(1) of the Government Roding Powers Act 1989</p> <p>Section 315 of the Local Government Act 1974 road definition:</p> <p>road means the whole of any land which is within a district, and which—</p> <ul style="list-style-type: none"> (a) immediately before the commencement of this Part was a road or street or public highway; or (b) immediately before the inclusion of any area in the district was a public highway within that area; or (c) is laid out by the council as a road or street after the commencement of this Part; or (d) is vested in the council for the purpose of a road as shown on a deposited survey plan; or (e) is vested in the council as a road or street pursuant to any other enactment;— <p>and includes—</p> <ul style="list-style-type: none"> (f) except where elsewhere provided in this Part, any access way or service lane which before the commencement of this Part was under the control of any council or is laid out or constructed by or vested in any council as an access way or service lane or is declared by the Minister of Works and Development as an access way or service lane after the commencement of this Part or is declared by the </div>

	<p>Minister of Lands as an access way or service lane on or after 1 April 1988:</p> <p>(g) every square or place intended for use of the public generally, and every bridge, culvert, drain, ford, gate, building, or other thing belonging thereto or lying upon the line or within the limits thereof;—</p> <p>but, except as provided in the Public Works Act 1981 or in any regulations under that Act, does not include a motorway within the meaning of that Act or the Government Roding Powers Act 1989</p> <p>Section 2(1) of the Government Roding Powers Act 1989 motorway definition</p> <p>motorway—</p> <p>(a) means a motorway declared as such by the Governor-General in Council under section 138 of the Public Works Act 1981 or under section 71 of this Act; and</p> <p>(b) includes all bridges, drains, culverts, or other structures or works forming part of any motorway so declared; but</p> <p>(c) does not include any local road, access way, or service lane (or the supports of any such road, way, or lane) that crosses over or under a motorway on a different level</p>
Sewage	means human excrement and urine.
Site	<p>means:</p> <p>(a) an area of land comprised in a single record of title under the Land Transfer Act 2017; or</p> <p>(b) an area of land which comprises two or more adjoining legally defined allotments in such a way that the allotments cannot be dealt with separately without the prior consent of the council; or</p> <p>(c) the land comprised in a single allotment or balance area on an approved survey plan of subdivision for which a separate record of title under the Land Transfer Act 2017 could be issued without further consent of the Council; or</p> <p>(d) despite paragraphs (a) to (c), in the case of land subdivided under the Unit Titles Act 1972 or the Unit Titles Act 2010 or a cross lease system, is the whole of the land subject to the unit development or cross lease.</p>
Stormwater	means run-off that has been intercepted, channelled, diverted, intensified or accelerated by human modification of a land surface, or run-off from the surface of any structure, as a result of precipitation and includes any contaminants contained within.
Structure	has the same meaning as in section 2 of the RMA (as set out in the box below)

	means any building, equipment, device, or other facility, made by people and which is fixed to land; and includes any raft.
Subdivision	<p>Has the same meaning as “subdivision of land” in section 218 of the RMA (as set out in the box below)</p> <p>Means-</p> <ul style="list-style-type: none"> (a) The division of an allotment- <ul style="list-style-type: none"> a. By an application to the Registrar-General of Land for the issue of a separate certificate of title for any part of the allotment; or b. By the disposition by way of sale or offer for sale of the fee simple to part of the allotment; or c. By a lease of part of the allotment which, including renewals, is or could be for a term of more than 35 years; or d. By the grant of a company lease of cross lease in response of any part of the allotment; or e. By the deposit of a unit plan, or an application to the Registrar-General of Land for the issue of a separate certificate of titles for any part of a unit on a unit plan; or (b) An application to the Registrar-General of Land for the issue of a separate certificate of title in circumstances where the issue of the certificate of title is prohibited by section 226.
Temporary military training activity	<p>means a temporary activity undertaken for the training of any component of the New Zealand Defence Force (including with allied forces) for any defence purpose. Defence purposes are those purposes for which a defence force may be raised and maintained under section 5 of the Defence Act 1990 which are:</p> <ul style="list-style-type: none"> (a) the defence of New Zealand, and of any area for the defence of which New Zealand is responsible under any Act; (b) the protection of the interests of New Zealand, whether in New Zealand or elsewhere; (c) the contribution of forces under collective security treaties, agreements, or arrangements; (d) the contribution of forces to, or for any of the purposes of, the United Nations, or in association with other organisations or States and in accordance with the principles of the Charter of the United Nations; (e) the provision of assistance to the civil power either in New Zealand or elsewhere in time of emergency; (f) the provision of any public service.
Visitor accommodation	Means land and/or buildings used for accommodating visitors, subject to a tariff being paid and includes any ancillary activities.

Wastewater

means any combination of two or more the following wastes:
sewage, greywater or industrial and trade waste.

Appendix 5 – Recommended changes to Consequential Amendments

ODP Section	Proposed amendment to notified text
Definitions - definition of papakāinga	<p><u>Papakāinga means one or more residential units and associated social and cultural activities established on <i>ancestral land</i> by an iwi, hapū or whānau of the Palmerston North district that enables the occupation by members of the same whānau, hapū or iwi, is a form of housing development which occurs on multiply owned Maori or ancestral land. Traditionally, the literal meaning of Papakāinga housing is, 'a nurturing place to return to'.</u></p>
Section 5.4 Land Use consents (c) Proposed Development Information and Plans	<p>Where relevant, the applicant must provide the following information and plans of the proposed development, including:</p> <ul style="list-style-type: none"> xi. A description of the activity for which consent is sought and its location. xii. Details of the appearance of any buildings. xiii. Floor plans. xiv. A calculation of site coverage, <u>permeable surface and landscaping coverage</u>, and the area of each building <u>and structure</u> in square meters, <u>including accessory buildings</u>. xv. <u>Location of outdoor living space</u> xvi. All landscape design, site planting and fencing. xvii. <u>Location and size of any stormwater attenuation devices</u>. xviii. Location of proposed activities, including <u>vehicle crossing(s)</u>, vehicle and cycle parking, loading, circulation and manoeuvring areas, —and provision for pedestrian and vehicle access <u>and rubbish and recycling storage and collection areas</u>. xix. Elevations of any buildings and structures showing their relationship to the street and any buildings on adjacent sites, <u>including the location and measurements of outlook space</u>. xx. Height relative to existing ground level.

Appendix 6 – Updated assessment against Horizons One Plan – Urban Form and Development objectives and policies

Relevant Objectives & Policies	How PC:I gives effect to the RPS
<p>UFD-O1: Strategic planning and urban development</p> <p>Strategic planning for urban development ensures that:</p> <ol style="list-style-type: none"> 1. sufficient development capacity* and land* supply for housing and business uses is provided to support growth, 2. new development, development infrastructure* and additional infrastructure* are provided in a coordinated, integrated and efficient manner, 3. the diverse and changing needs of people, communities, and future generations are provided for through quality, sustainable urban form, and 4. competitive land* and development markets are supported in ways which improve housing affordability. 	<p>The contribution made by PC:I to housing growth is set out in the Development Capacity Assessment. At the time of writing the DCA, PC:I was estimated to make a conservative contribution of 1,521 dwellings to housing demand. Revised modelling, as presented in Ms Andrews' evidence, increases the potential contribution to between 2,532 – 3,173 dwellings, depending on lot sizes.¹²¹ PC:I has the potential to meet the total medium and long-term estimated demand for infill, as identified in the HBA</p> <p>The Council considered the relevant development and additional infrastructure servicing requirements for PC:I, as set out in the DCA.</p>
<p>UFD-O3: Urban form and function</p> <p>The intensification and expansion of urban environments*:</p> <ol style="list-style-type: none"> 1. contributes to well-functioning urban environments* that: <ol style="list-style-type: none"> a. enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future, b. increase the capacity and choice available within housing and business land*, c. achieve a quality, sustainable and compact urban form, are, 	<p>Objective MRZ-O2 and Policy MRZ-P3 are specifically drafted to give effect to UFD-O3(1)(a) and (b),</p> <p>The location and extent of the zone has been determined, as set out in the Accessibility and Demand Assessment, to achieve UFD-O3(1)(c) and (d) and (2).</p> <p>Objective MRZ-O5 and Policy MRZ-P11 and rules MRZ-R19, R20 and R21 are specifically drafted to give effect to UFD-O3(1)(e).</p>

¹²¹ Statement of Evidence of Stacy Andrews, dated 25 July 2025, Table 4

Relevant Objectives & Policies	How PC:I gives effect to the RPS
<p>or planned to be, well connected by a choice of transport modes including public transport*,</p> <p>d. manage adverse effects* on the environment, and</p> <p>e. manage reverse sensitivity effects* on the operation, maintenance and upgrade of nationally significant infrastructure*, including infrastructure^ and facilities and assets of regional or national importance.</p> <p>2. enable more people to live in, and more businesses and community services* to be located in,</p> <p>a. areas of an urban environment* where: a. is in or near a centre zone* or other area with many employment opportunities,</p> <p>b. it is able to be, or is, well-serviced by existing or planned public transport* and active transport*,</p> <p>c. there is a high demand for housing or business land*, relative to other areas within the urban environment*.</p>	
<p>UFD-O5: Urban development and climate change^</p> <p>Urban environments* are resilient to the effects* of climate change^ and support reductions in greenhouse gas^ emissions.</p>	<p>PC:I gives effect to this objective by determining a zone extent which is accessible to a variety of employment and local services by public or active transport. This supports mode shift and hence opportunities to support reductions in greenhouse gas emissions.</p> <p>Increasing resilience to the effects of climate change is achieved primarily through the proposed Stormwater Overlay, and rules requiring stormwater quantity attenuation and management. MRZ-O8 requires the incorporation of water sensitive design in larger developments, which also contributes to increasing climate change resilience.</p>

Relevant Objectives & Policies	How PC:I gives effect to the RPS
	<p>The requirement for a specimen tree as part of landscaping contributes to providing shade to assist with mitigation potential future urban heat island effects arising from the effects of climate change.</p>
<p>UFD-P1: The integration of infrastructure^ with land^ use</p> <p>Territorial Authorities* must proactively develop and implement appropriate land* use strategies to manage urban growth that:</p> <ol style="list-style-type: none"> 1. for urban environments*, demonstrate how sufficient development capacity* for housing and business land* will be provided in the short term*, medium term* and long term* in a well-planned and integrated manner, and 2. for all settlements, ensure there is co-ordination between the location, form and timing of urban development and the planning, funding, delivery and implementation of development infrastructure*. 	<p>PC:I enables housing intensification across the MRZ as a permitted activity outside the proposed Stormwater Overlay. Within the overlay, a resource consent for a Restricted Discretionary Activity would be required. However, this still meets the definition of plan-enabled in the NPS-UD.</p> <p>This is demonstrated in the Development Capacity Assessment.</p> <p>The servicing assessments supporting PC:I describe the infrastructure upgrades, if any, required to support residential intensification and the timing for these.</p>
<p>UFD-P2: Providing sufficient development capacity*</p> <p>Sufficient development capacity* and land* supply is provided for in the short term*, medium term* and long term* to accommodate demand for housing and business land* in urban environments* by:</p> <ol style="list-style-type: none"> 1. providing for urban intensification and urban expansion within district plans^ in accordance with UFD-P1, UFD-P4, and UFD-P5, 2. local authorities^ being responsive to unanticipated or out of sequence plan changes that 	<p>PNCC is providing for urban intensification through PC:I and introduction of the MRZ.</p> <p>The contribution made by PC:I to housing growth is set out in the Development Capacity Assessment. At the time of writing the DCA, PC:I was estimated to make a conservative contribution of 1,521 dwellings to housing demand. Revised modelling, as presented in Ms Andrews' evidence, increases the potential contribution to between 2,532 – 3,173 dwellings, depending on lot sizes.¹²² PC:I has the potential to meet the total medium and long-term estimated demand for infill, as identified in the HBA</p>

¹²² Statement of Evidence of Stacy Andrews, dated 25 July 2025, Table 4

Relevant Objectives & Policies	How PC:I gives effect to the RPS						
<p>would add significantly to development capacity* and contribute to well-functioning urban environments* in accordance with UFD-P6, and</p> <p>3. ensuring the urban intensification and expansion necessary to meet the housing bottom lines* specified in Table 11 is provided for in the Palmerston North District Plan.</p> <p>Table 1 Housing bottom lines* for Palmerston North, 2023-2053</p> <table border="1" data-bbox="284 658 815 1003"> <thead> <tr> <th colspan="2" data-bbox="284 658 815 741">Housing bottom lines* (number of dwellings)</th> </tr> <tr> <th data-bbox="284 741 552 954">Short- to medium-term July 2023 – June 2033 Includes an additional margin of 20%</th> <th data-bbox="552 741 815 954">Long-term July 2033 – June 2053 Includes an additional margin of 15%</th> </tr> </thead> <tbody> <tr> <td data-bbox="284 954 552 1003">3,993</td> <td data-bbox="552 954 815 1003">5,891</td> </tr> </tbody> </table>	Housing bottom lines* (number of dwellings)		Short- to medium-term July 2023 – June 2033 Includes an additional margin of 20%	Long-term July 2033 – June 2053 Includes an additional margin of 15%	3,993	5,891	
Housing bottom lines* (number of dwellings)							
Short- to medium-term July 2023 – June 2033 Includes an additional margin of 20%	Long-term July 2033 – June 2053 Includes an additional margin of 15%						
3,993	5,891						
<p>UFD-P4: Urban intensification and expansion</p> <p>3. Intensification and expansion of urban environments* is provided for and enabled in district plans[^] where:</p> <ol style="list-style-type: none"> it contributes to a well-functioning urban environment*, it contributes to a range of residential and business areas that enable different housing and/or business types, site* size and densities, higher density development is in close proximity to centre zones*, public transport*, community services*, employment opportunities, and open space, development is well serviced by existing or planned development infrastructure* 	<p>PC:I enables residential intensification which contributes to a well-functioning urban environment and enables a range of housing via MRZ-O2. The zone extent has been determined based on proximity to public transport, community services, employment and open space (as set out in the Accessibility and Demand Assessment). The height and bulk envelope for residential intensification in the MRZ is based on the MDRS and they give effect to the NPS-UD.</p> <p>The infrastructure servicing assessments supporting the plan change identify the existing capacity and any updates required to support intensification. The Development Capacity Assessment has determined the zone is 'infrastructure-ready' in accordance with NPS-UD.</p>						

Relevant Objectives & Policies	How PC:I gives effect to the RPS
<p>and enables provision of public transport*, and additional infrastructure* required to service the development capacity* is likely to be achieved,</p> <ul style="list-style-type: none"> e. it protects natural and physical resources that have been scheduled within the One Plan in relation to their significance or special character, f. to the extent reasonably possible, the operation, maintenance and upgrade of nationally significant infrastructure* is not compromised, and g. it promotes positive effects*, and gives appropriate priority to the health and well-being of waterbodies*, freshwater* ecosystems, and other receiving environments* where they are potentially adversely affected by urban development, while at a minimum avoiding, remedying or mitigating those effects* (including cumulative effects*). <p>...</p> <p>3. District plans^ applying to urban environments* must enable heights and density of urban form which are commensurate with the greater of:</p> <ul style="list-style-type: none"> a. relative demand for housing and/or business use in that location, or b. the level of accessibility provided by existing or planned* active transport* or public transport* to areas with community services* and employment opportunities. <p>...</p>	<p>There are no specifically scheduled resources in the One Plan within the zone extent that require protection.</p> <p>The objectives, policies and rules have been drafted so as not to compromise the continued operation, maintenance and upgrade of the rail corridor and the state highway. This is confirmed through the lack of submissions from KiwiRail and supporting submissions from NZTA.</p> <p>A key focus of PC:I is managing effects on health and well-being of water, to the extent possible within PNCC's roles and responsibilities under the RMA.</p>
<p>UFD-P5: Built forms</p>	<p>The objectives, policies, rules and standards in PC:I specifically give effect to this policy, including by</p>

Relevant Objectives & Policies	How PC:I gives effect to the RPS
<p>Territorial Authorities* must ensure the form and design of subdivision*, use and development in urban environments* is managed so that overall it:</p> <ol style="list-style-type: none"> 1. contributes to a well-functioning urban environment*; 2. provides for a range of housing types and densities and employment choices in a manner that integrates with existing and planned development infrastructure*; 3. recognises the importance of marae and papakāinga and enables their development, ongoing use and protection from incompatible development and reverse sensitivity adverse effects*, where existing or planned development infrastructure* of sufficient capacity is, or can be, provided, and 4. where appropriate, enables development across multiple or amalgamated properties* to achieve all of the above. 	<p>describing the built form (MRZ-O2 and MRZ-P3), by enabling papakāinga and marae (MRZ-O1, MRZ-P1, MRZ-R1, MRZ-R7 and MRZ-R16).</p> <p>There is nothing in PC:I that prevents development across multiple or amalgamated properties.</p>
<p>UFD-P7: Hapū* and iwi* involvement in urban development</p> <ol style="list-style-type: none"> 1. Local Authorities^, in taking account of the principles of Te Tiriti o Waitangi (Treaty of Waitangi)^ in relation to urban environments*, must enable hapū* and iwi* involvement in urban development planning processes, including in decision making where appropriate, and to ensure provision is made for their needs, aspirations, and values, to ensure urban environments* enable Māori to express their cultural traditions and norms. 2. As part of making provision for iwi* and hapū* needs, aspirations, and 	<p>Rangitāne o Manawatū has been involved in the development of PC:I since its inception and their Clause 3B response to consultation on preparation of the plan change¹²³ describes how Rangitāne feedback has been reflected in the plan change.</p> <p>Development of PC:I had regard to the Rangitāne Environmental Management Plan, as described in Section 31 of the Section 32 assessment.</p> <p>PC:I includes specific objectives and policies to support achievement of Rangitāne needs, aspirations and values, including in relation to water</p>

¹²³ [plan-change-i-rom-response-to-clause-3b-consultation.pdf](#)

Relevant Objectives & Policies	How PC:I gives effect to the RPS
<p>values land* use strategies must be proactively developed and implemented to manage urban development in a manner which:</p> <ol style="list-style-type: none"> a. has regard to resource management issues of concern to hapū* and iwi*, including those identified in any relevant iwi management plan*, b. enables papakāinga housing and marae, c. enables early and ongoing engagement with iwi* and hapū* over urban intensification and expansion, d. ensures urban environments* enable Māori to express their cultural traditions and norms, and e. identifies and protects culturally significant areas. 	<p>quality, stormwater management and enabling papakāinga and marae.</p>
<p>UFD-P8: Urban development and climate change[^]</p> <ol style="list-style-type: none"> 1. Urban environments* are developed in ways that support reductions in greenhouse gas[^] emissions and improve resilience to the effects* of climate change[^] by: <ol style="list-style-type: none"> 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* minimisation, transportation modes (including use of public transport* and active transport*) water-sensitive design and nature-based solutions, 	<p>PC:I gives effect to UDF-P8 in Chapter 7B – Subdivision in the MRZ and Chapter 10A – MRZ, including:</p> <ul style="list-style-type: none"> - The zone extent was determined based on accessibility by active and public transport to a variety of community and commercial activities - The built form and subdivision objectives and policies include references to energy efficiency, maximising solar gain and use of water sensitive urban design (WSUD includes nature-based solutions). <p>The notified controls in PC:I integrate sustainable transport options into the zone extent and Policy MRZ-P10 requires encouragement of energy efficient design.</p>

Relevant Objectives & Policies	How PC:I gives effect to the RPS
<ul style="list-style-type: none"> b. urban development being compact, well designed and sustainable, and c. requiring a risk based approach to their resilience to the impacts of climate change[^], including sea level rise* and any increases in the scale and frequency of natural hazard* events. <p>2. Territorial Authority* decisions and controls:</p> <ul style="list-style-type: none"> a. on subdivision* and land* use must ensure that sustainable transport options such as public transport*, walking and cycling are integrated into land* use development, and 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. 	

Appendix 6 – PNCC process for assessing liquefaction risk

Liquefaction Process at PNCC

There are two ways in which Liquefaction is addressed at PNCC.

1. Through the Building Consent (BC) process.
2. At the subdivision application stage.

All Geotechnical reports [should](#) assess for liquefaction.

BC Process

When a building consent is applied for the building officers (BCO) will undertake an assessment as to whether a Geotechnical/Liquefaction assessment is required.

In carrying out this assessment the BCO's will:

1. Determine building Importance Level ([NZBC Clause A3](#)).
2. Review GIS layers:
 - (a) Liquefaction to determine technical category zone. Check that the actual site contours match the zone boundaries and consider proximity as well.
 - (b) Bad ground (mainly for IL1 buildings).
 - (c) Geo-Technical Report (prior assessments carried out under building, subdivision or land-use consents).
 - (d) Check imagery for proximity to watercourses, terraces and similar water-based land features. Layers for this include:
 - (i) Contours cache (NZVD2016),
 - (ii) Elevation (LiDAR 2018),
 - (iii) Aerials_Hist,
 - (iv) Aerials_Archive,
 - (v) [Retrolens](#) website (external).
3. For alterations, refer to PNCC [Natural Hazards Guidance Document](#). If minor, then Geotechnical assessment may not be required, though a soils investigation report & SED foundations may be.
4. Refer to Engineering NZ guidance flowchart "[Engineering NZ geotechnical input decision chart](#)"
5. Refer to MBIE guidelines:
 - a. [Planning and engineering guidance for potentially liquefaction-prone land](#).
 - b. [Repairing and rebuilding houses affected by the Canterbury earthquakes](#).

As a result of this assessment the BCO may require a Geotechnical assessment which may then require structurally engineered foundations. Any subsequent foundation design may be referred to the Geotechnical report author to ensure that their recommendations have been met.

Geotechnical assessments must be site specific. There is not sufficient density of testing in Palmerston North to allow interpolation based on existing results.

Once testing has been carried out a Property Issues Form will be raised to ensure that the information is captured in the GIS system.

Subdivision Process

When a subdivision consent is applied for the planning officers (PO) will undertake an assessment as to whether a Geotechnical/Liquefaction assessment is required. Quite often a Geotechnical Assessment will be provided with an application.

Where no Geotechnical assessment is provided a PO will:

1. Refer to the liquefaction layer in GIS
2. Review the bad ground layer in GIS to see if any exists near the subject site
3. Review historical aerials for any former streams etc
4. Refer to any previous Geotechnical assessment that may have been carried out on the site as part of a subdivision or land-use consent.
5. Consult with a PNCC Development Engineer

As a result of this assessment the PO may require a Geotechnical assessment to be provided and specifically request liquefaction to be addressed.

Where a Geotechnical assessment is provided a PO will consult with a PNCC Development Engineer to determine if the Geotechnical assessment needs to be peer reviewed.

Conditions will be set based on what the Geotech assessment and Peer review recommend/require.

At the subdivision stage the assessments are done to confirm restricted/no-build areas, located and confirm effluent disposal fields, identify where specific foundation design is required. Effectively this assessment will confirm that each site is suitable for residential development.

Consent notice conditions are imposed as required.

PNCC has had only one residential development at Hokowhitu Lagoon Development Area where assessments were carried out that determined what the foundations of each dwelling had to be.

Note – Geotechnical/liquefaction assessments are not typically required at the subdivision or land-use consent stage in existing developed urban areas unless the land has significant sloping features. When land is to be developed in these areas, the need for geotechnical and liquefaction assessments will be carried out by the BCO at the building consent stage, as they will have all the information about the building's construction materials and location.