

**Proposed Plan Change I: Increasing
housing supply and choice**

Accessibility and Demand Assessment



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Contents

1	Introduction	1
2	Relevant statutory context	2
2.1	National Policy Statement on Urban Development 2020	2
3	Approach to determining accessibility and demand	3
3.1	Spatial extent of accessibility and demand assessment	3
3.2	Determining accessibility and relative demand	4
3.2.1	Policy 5(a) – Level of accessibility	4
3.2.2	Policy 5(b) – determining relative demand	7
3.3	Mapping accessibility and demand	9
3.3.1	Proposed MRZ - 2022.....	10
4	Reviewing the MRZ extent – 2024	13
4.1	Public consultation feedback	13
4.1.1	Response to feedback	14
4.2	Outcome of technical assessments.....	17
4.3	Additional sites.....	17
5	Final proposed MRZ extent.....	19
Appendix A. McIndoe Urban – Urban Design Memo #8 – determining appropriate ped-shed walking distances		21
Appendix B. Assessment of relative demand.....		22
Appendix C. Response to feedback on additional areas for inclusion in MRZ.....		31

Figures

Figure 1: Palmerston North city urban area.....	3
Figure 2: Proposed MRZ extent.....	19
Figure 3: projected household types in Palmerston North 2018-2053	24
Figure 4: Projected family composition in Palmerston North 2018-2053.....	24
Figure 5: Project average household size in Palmerston North, 2018-2053.....	25
Figure 6: Projected Palmerston North city population by age group, 2024-2054.....	26
Figure 7: Issued building consents for multi-unit developments in Palmerston North 2018-2023	27
Figure 8: Housing Register requirements by number of bedrooms in Palmerston North, at June 2024	28
Figure 9: Location of multi-unit developments and significant areas of employment in Palmerston North (2018-2023).....	29

Figure 10: Location of recently consented (2018-2023) multi-unit developments and large neighbourhood centres in Palmerston North	30
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1 Introduction

Proposed Plan Change I: Enabling housing supply and choice (PC:I) responds to the direction in the National Policy Statement on Urban Development 2020 (NPS-UD) for Palmerston North City Council (PNCC or the Council) to enable a greater variety and density of homes, provide a well-functioning urban environment, and improve accessibility between housing, jobs, community services, natural spaces, open spaces and public and active transport.

The plan change proposes to replace part of the existing Residential Zone in the operative Palmerston North City Council District Plan (ODP) with a Medium Density Residential Zone (MRZ). The proposed zone extent correlates with properties within walking distance of the city centre, large neighbourhood centres, parks, primary and intermediate schools, and public and active transport routes and it incorporates the majority of the Multi-Unit Housing Areas (MUHA) in the OPD. The exceptions are the Napier Road, Hokowhitu Lagoon, Mātangi and Aokautere MUHA¹.

Policy 5 in the NPS UD requires the Council to enable heights and density of urban form commensurate with the greater of the level of accessibility to existing or planned active or public transport to a range of commercial activities and community services or the relevant demand for housing.

This report outlines the methodology for spatially identifying the extent of the MRZ to meet the direction in Policy 5, and the relevant statutory documents, policy context, and technical advice that informed this approach.

The report is split into four sections:

- Section 2 – summarises the relevant statutory documents and policy context and how they informed the approach to identifying the proposed zone extent.
- Section 3 – describes the approach for determining accessibility and reasonably level of demand and the 2022 draft MRZ extent
- Section 4 – describes the outcome of the 2024 review of the MRZ extent, including in response to public feedback.
- Section 4 – describes the proposed MRZ extent.

¹ Maps 10.6.3.3(f)-(i) in Section 10 of the ODP.

2 Relevant statutory context

2.1 National Policy Statement on Urban Development 2020

PNCC is identified as a Tier 2 local authority in the NPS UD. Tier 2 authorities are required to provide, at all times, at least sufficient development capacity to meet the expected demand for housing over the short, medium and long-term (Policy 2).

There are a number of objectives in the NPS UD which help to inform the approach to undertaking the accessibility and demand analysis required by Policy 5:

- **Objective 1:** New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- **Objective 3:** Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
 - a) the area is in or near a centre zone or other area with many employment opportunities
 - b) the area is well-serviced by existing or planned public transport²
 - c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment
- **Objective 8:** New Zealand's urban environments:
 - a) support reductions in greenhouse gas emissions; and
 - b) are resilient to the current and future effects of climate change.

In addition to policies 2 and 5, Policy 1 is also relevant for determine the proposed zone extent:

- **Policy 1:** Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum ... :
 - (c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and ...
 - (e) support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change.

² Horizons Regional Council introduced new routes and services from March 2024. Future public transport upgrades will focus on improving the level of service.

3 Approach to determining accessibility and demand

3.1 Spatial extent of accessibility and demand assessment

The direction in Policy 5 of the NPS-UD applies to “urban environments”, which are 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.”

For the purpose of this assessment, therefore, the urban environment is defined as the boundaries of the urban areas of Palmerston North city as defined by Statistic New Zealand and shown in Figure 1. This area includes aggregations of a number of smaller statistical areas (SA1, SA2 and mesh blocks).

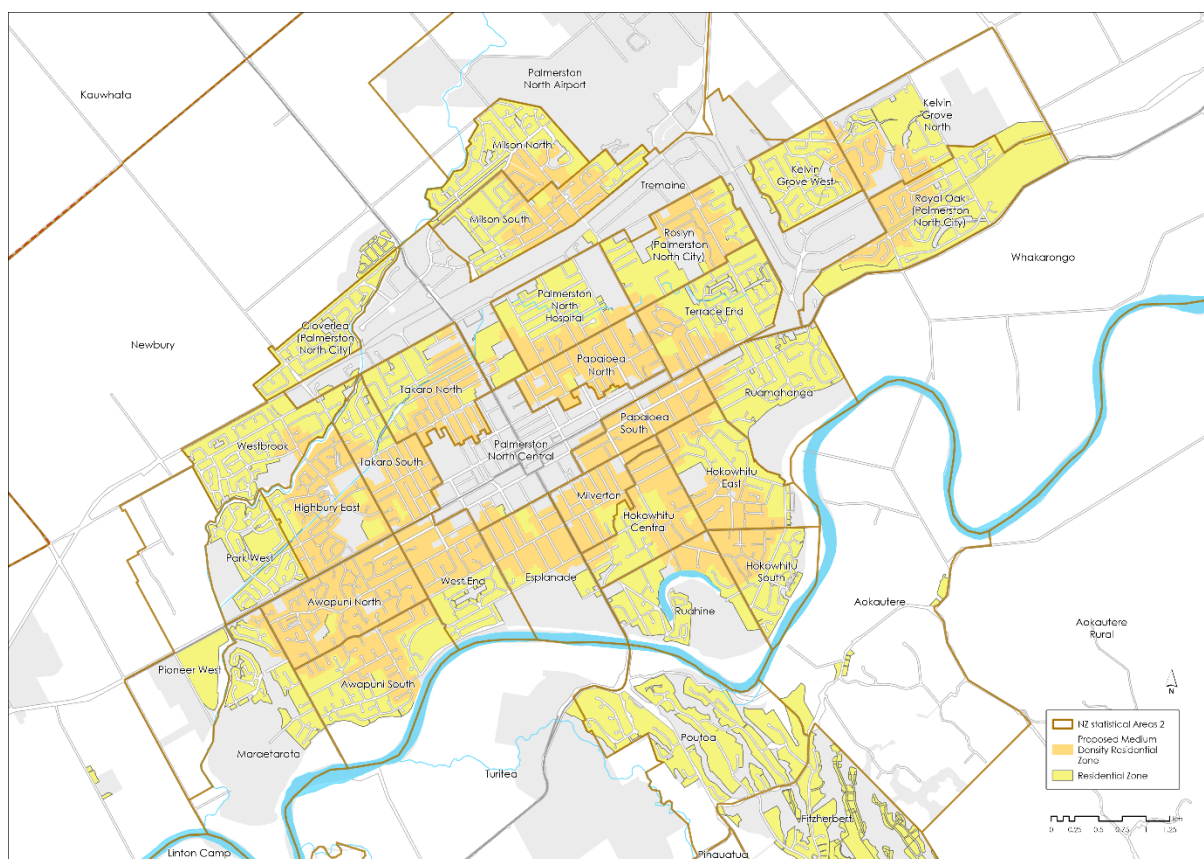


Figure 1: Palmerston North city urban area

3.2 Determining accessibility and relative demand

3.2.1 Policy 5(a) – Level of accessibility

Meeting the direction in Policy 5(a) requires determining a number of different matters:

- Defining what is meant by 'active transport' in the context of Palmerston North and mapping the location of existing or planned active transport;
- Defining what is meant by 'public transport' in the Palmerston North context and mapping the location of existing or planned public transport;
- Defining 'commercial activities and community services';
- Defining what is meant by 'level of accessibility'; and
- Determining an appropriate metric for accessibility.

The Ministry for the Environment's guidance document '*Understanding and implementing intensification provisions for the National Policy Statement on Urban Development*', published in 2020, provides guidance to local authorities undertaking these assessments.

Relevant definitions

For the purpose of this assessment, the following definitions were used:

Table 1: Key criteria

NPS-UD Criteria	NPS definition	Application to PC:I
Active Transport	Forms of transport that involve physical exercise, such as walking or cycling, and includes transport that may use a mobility aid such as a wheelchair.	For PC:I the active transport network is: <ul style="list-style-type: none">• Walking - the existing and planned street network, including pedestrian-only alleyways.• Cycling – the existing and planned cycle network
Public Transport	Existing or planned service for carriage of passengers (other than an aeroplane), that is available to the public generally by means of: <ul style="list-style-type: none">• A vehicle designed or adapted to carry more than 12 persons (including the driver); or• A rail vehicle; or	For PC:I the public transport network encompasses public busses only – there are no local passenger rail services and no ferry services. The public bus network is as identified and managed by Horizons Regional Council following changes to the routes and frequencies introduced in March 2024 - Palmerston North and Ashhurst network - Horizons Regional Council .

NPS-UD Criteria	NPS definition	Application to PC:I
	<ul style="list-style-type: none"> A ferry 	
Commercial activities	Defined in the National Planning Standards as <i>"means any activity trading in goods, equipment or services. It includes any ancillary activity to the commercial activity (for example administrative or head offices)"</i>	<p>Commercial activities are defined as those provided in areas zoned as the city centre³ and the following Large Neighbourhood Centres (as defined in the ODP):</p> <ul style="list-style-type: none"> Hokowhitu Shopping Centre (corner of Te Awe Awe Street and Albert Street) Milson Shopping Centre (corner of Milson Line and McGregor Street) Kelvin Grove Shopping Centre (corner of Fernlea Avenue and Roberts Line) Riverdale Shopping Centre (corner of College Street and Pitama Road) Highbury Shopping Centre (corner of Highbury Avenue and Pembroke Street); and Terrace End Centre (corner of Broadway Avenue and Ruahine Street). <p>The supermarket and shops on at 514 – 520 Pioneer Highway are included as a neighbourhood centre as the activities consented at that location mimic those at the above neighbourhood centres.</p> <p>The neighbourhood centre at Roslyn, on the corner of Vogel Street and Milton Street, was included because of the variety of local services, including pharmacy, bakery, food market and post office and the Roslyn Community Library.</p>
Community services	Community facilities ⁴ , educational facilities ⁵ and those commercial activities	For the purpose of PC:I, these have been defined as:

³ The City Centre is the land concentrated around The Square Te Marae o Hine and radiating out down Main Street East and West, Rangitikei Street and Fitzherbert Avenue and zoned in the District Plan as Inner Business, Outer Business and Fringe Business

⁴ Defined in the National Planning Standards as "land and buildings used by members of the community for recreational, sporting, cultural, safety, health, welfare or worship purposes. It includes provisions for any ancillary activity that assists with the operation of the community facility."

⁵ Defined in the National Planning Standards as "land or buildings used for teaching or training by childcare services, schools, or tertiary education services, including any ancillary activities."

NPS-UD Criteria	NPS definition	Application to PC:I
	that service the needs of the community.	<ul style="list-style-type: none"> • Council-owned parks and playing fields • Mangaone and Kawau streams (recreational corridors) • All public primary and intermediate schools <p>Exclusions:</p> <p>Secondary schools - excluded because, in Palmerston North, individual high school enrolment zones cover wide parts of the city or there are no enrolment zones. There is also a mix of state and non-state schools and secondary students tend to match their school to their learning needs on an individual basis⁶.</p> <p>Pre-schools, kindergartens, early childhood education centres and kohanga reo - excluded as these facilities are scattered across Palmerston North and parental/care giver decisions about the right centre for their child/ren will likely be driven by more than immediate accessibility to home. For example, proximity to place of work, space availability or the right fit for the child. There are a significant number of childcare centres within the city centre and several in the industrial zone, to which accessibility has already been mapped.</p> <p>Tertiary education facilities in Palmerston North including Massey University, UCOL, Te Wānanga o Aotearoa, Teacher's Training College - with the exception of Massey University and the IPU Tertiary Institute of NZ (which are accessible by public transport and cycling), the majority of facilities are located within the city centre, which is already part of the accessibility assessment.</p> <p>Doctors, dentists and medical centres - excluded because they are primarily located across the city centre, which has</p>

⁶ [Find your nearest school | Education Counts](#) – accessed 19 August 2024.

NPS-UD Criteria	NPS definition	Application to PC:I
		already been included in the accessibility mapping.
Level of accessibility	N/A. For the purpose of PC:I, the level of accessibility is determined by the level of service, i.e. the availability of active and public transport infrastructure and frequency of services.	The Transportation Assessment concludes, in Section 2, that the majority of the proposed MRZ has good access to either existing cycling facilities (i.e. marked cycle lanes with or without painted buffers or physical separation, on or off road facilities, shared with pedestrians or for cyclists only) or public transport, or both, and therefore it has a good level of service.

Determining walkable catchments

Whilst PNCC, as a Tier 2 local authority, is not required to enable taller buildings within specified walkable catchments, walkable catchments are an appropriate metric for determining the level of accessibility as they are the “*area that an average person could walk from a specific point to get to multiple destinations*”.⁷

Based on advice from McIndoe Urban in October 2022, which itself was based on the 2020 MfE guidance on implementing the NPS-UD (see Section 3 of memo provided in **Appendix A**), the following walking distances were adopted to determine the size of the walkable catchment:

- 800m from land zoned as the city centre, a Large Neighbourhood Centre or the Roslyn neighbourhood centre
- 400m from an open space reserve
- 600m from a bus stop
- 800m from a primary or intermediate school

3.2.2 Policy 5(b) – determining relative demand

Policy 5(b) requires a determination of the relative demand for housing across the city. The demand assessment involved a review of:

- Palmerston North City 2023 Housing and Business Development Capacity Assessment (HBA)
- population projections;

⁷ Section 5.5 – “Understanding and implementing intensification provisions for the National Policy Statement on Urban Development (2020)”, MfE.

- residential building consent data; and
- social housing register data.

The outcome of this review is provided in **Appendix B**. In summary:

- An increase in couples without children and one parent families may drive an increased demand for smaller dwellings. There is a demand for smaller housing to meet the needs of people on the Housing Register. However, the average household size is projected to remain relatively static, driven by projected increases in the number of Māori and Pasifika families and multi-generational households.
- There appears to be a correlation (although not particularly strong) between the location of MUH delivered between 2018 and 2023 and
- the city centre and in the suburbs of Roslyn, Hokowhitu, Awapuni and Takaro (the developments in these suburbs were primarily undertaken by Kāinga Ora);
- the city's five more significant employment areas (Palmerston North Hospital, the Tremaine Avenue and Keith Street industrial areas, Massey University and the city centre); and
- the Awapuni, Hokowhitu, Highbury, Milson and Roslyn neighbourhood centres.

In addition, Section 6.5.3 in MfE's guidance for implementing the NPS-UD suggests a range of areas where demand is often high and intensification could be appropriate:

- **Areas with high land prices relative to others** – A review of the Council's rating database shows that there are 24 suburbs across the city where land to capital value ratios can exceed 0.87 and hence there may be high redevelopment potential⁸. These suburbs have been considered in light of the walking catchments identified in Section 3.2.1.

• Awapuni North	• Awapuni South
• Esplanade	• Highbury East
• Hokowhitu Central	• Hokowhitu East
• Hokowhitu South	• Maraetara
• Milverton	• Palmerston North Hospital
• Papaioea North	• Papaioea South
• Roslyn	• Royal Oak
• Ruamahanga	• Ruahine

⁸ Ratio is consistent with the 2023 Housing and Business Development Capacity Assessment (Section 6.4.3).

- Takaro North
 - Terrace End
 - Takaro South
 - West End
- **Locations close to open space and recreation opportunities** – the majority of the city's residential areas are within 500m of public open space. As a result, this is not seen as a significant driver of demand.
 - **Areas within, or close to, centres** – despite localised areas of traffic congestion at peak times, Palmerston North remains a highly permeable city for private motor vehicles. Accessibility to, or proximity to, the city centre (or neighbourhood centres) is unlikely to be a significant driver for demand.
 - **Areas with good transport opportunities** – Horizons Regional Council's 2024 bus network upgrade improved public transport accessibility across the city. The new and improved services run at 15-minute intervals at weekday peak times (generally between 7am-9am and 3pm-6pm) and at 30-minute intervals at other times (including weekends). Information from Horizons Regional Council suggests significantly increased patronage as a result (for example up 54% in April 2024 across the network). Given the increased level of accessibility across the city, in and of itself, access to public transport is unlikely to be a significant driver of demand.
 - **Areas close to key services including schools, hospitals and supermarkets** – there is only one hospital in Palmerston North, which serves the city and the wider region. As a result, this is unlikely to be a demand driver. As described in Table 1 of this report, access to secondary schools is unlikely to be a demand driver due to the relative lack or significant size of enrolment zones. Areas close to primary or intermediate schools have been mapped to determine accessibility. Supermarkets are located across the city and are not seen as a specific demand driver given availability of online shopping and delivery and linkages to other activities such as places of employment.
 - **Areas close to a range of business activities** – despite localised areas of traffic congestion at peak times, Palmerston North remains a highly permeable city for private motor vehicles. Accessibility to, or proximity to, business activities (which are spread across the city centre) is therefore unlikely to be a significant driver for demand.
 - **Locations with good views, outlook and amenity** – The relatively flat topography of Palmerston North, with the exception of Summerhill, Aokautere and some parts of Kelvin Grove, means that views are unlikely to be a driver of demand, and this appears to be reflected in the building consent data. Similarly, there are limited areas of the city where green space and water views could drive demand. The Hokowhitu Lagoon area is one such location – housing in this area is typified by large single dwellings on a variety of lot sizes.

3.3 Mapping accessibility and demand

When considering how to provide at least sufficient development capacity to meet the expected demand for housing (Policy 2 of the NPS-UD), Policy 5 requires the Council to

enable heights and density commensurate with the greater of the level of accessibility or the relative demand for housing. As described in MfE's 2020 guidance on implementing the NPS-UD,

- *"you do not need both good accessibility and higher relative demand to enable greater heights and densities.*
- *If you have high demand but no/low/moderate accessibility you still need to ensure greater heights and densities are enabled.*
- *If you have high accessibility but no/low/moderate demand you still need to ensure heights and densities that reflect the level of accessibility are enabled.*
- *If you have both high demand and high accessibility then you should be seeking to enable more height and density in those areas, as these are the most suitable to accommodate intensification".⁹*

All intensification should be enabled in a way which is consistent with meeting the definition of well-functioning urban environments.

As described in Section 3.2.1, there is good active (walking and cycling) and public transport accessibility across much of the city to areas of employment. Walking distances from employment areas, neighbourhood centres, public open space, primary and intermediate schools and bus stops represent the overall access to a range of commercial activities and community services.

As described in 3.2.2 there appears to be a correlation between the historic locations of MUH and several parts of the city. In addition, there are 24 suburbs with land to capital value ratios above 0.87, which indicate a relative demand for residential redevelopment.

Given the apparent lack of a strong geographically driven demand for MUH in Palmerston North, the level of accessibility is the driver for determining where more enabling building heights and densities should be located.

3.3.1 Proposed MRZ - 2022

In 2022, PNCC undertook the process set out in Table 2 to determine the draft spatial extent for the MRZ. To be located within the draft MRZ extent, properties needed to be within all four walking catchments or the ODP Multi-Unit Housing Areas (MUHA) at the time. This excluded the MUHA in Aokautere, Matangi, Hokowhitu Lagoon and Napier Road as these areas were included in the ODP at later dates.

Table 2: Approach to mapping proposed 2022 MRZ extent

Step	Purpose	Output
STEP 1: First Pass Extent	Using GIS, determine the spatial extent for each of the four walking	Individual geospatial extent defined by GIS for walking catchments and the ODP MUHA.

⁹ Section 6.5.4.

Step	Purpose	Output
	catchments, measured from the road centreline. Combine this with the MUHA in the ODP.	
STEP 2: Second Pass Extent	Manually review all land parcels included in the draft extent to refine zone extent taking into account mapping anomalies, urban form, site constraints, and other matters.	Geospatial extent defined by GIS for the five layers are manually reviewed. The matters considered as part of the manual review are set out in Table 3, below.
STEP 3: Third Pass Peer Review Extent	Review of Step 2 decisions for including and excluding particular properties from spatial extent.	Step 2 decisions are reviewed with all decisions confirmed, reassigned if necessary and verified.

The reviews resulted in refinement of the MRZ extent in terms of the overall extent and at the edges. Table 3 describes the approach to making decisions to extend or reduce the zone.

Table 3: Matters considered in review of proposed 2022 MRZ zone extent

Criteria	Approach
Alleyways – do pedestrian alleyways provide access to the locations within the specified walking distance?	If no, exclude If yes, include
Rear/landlocked properties – are there rear or landlocked properties without any road frontage within walking distance to the specified locations which have been excluded?	If yes, include
Properties at end of cul-de-sacs – Are there any properties outside the specified walking distances that are only located along and accessed by a cul-de-sac?	If yes, and the cul-de-sac is no longer than 50 metres long, include.
Adjacency extension – does the spatial extent exclude any properties that are marginally outside of the walking distance criteria but should be extended to include given topography, anticipated built form, or the surrounding transport network conditions?	If yes, include If no, exclude

Criteria	Approach
Adjacency Island – Does the spatial extent result in small, isolated 'island' groupings of Residential Zone properties along a street that are marginally outside of the walking distance for all specified locations and they are located between or surrounded by lots that would be in the zone?	If yes, include If no, exclude
Beyond walking distance – Does the spatial extent result in any properties being included that are beyond the specified walking distances?	If yes, exclude
Confirm reason – are any properties excluded or included in the spatial extent but should or should not be included for any other unique reason?	If yes, include If no, exclude
Logical edge – do properties included or excluded in the spatial extent represent a 'logical edge'? For example, is a property marginally outside of the walking distance but located between the spatial extent and a different land use or zone?	If yes, include If no, exclude

4 Reviewing the MRZ extent – 2024

The MRZ zone extent was reviewed in 2024 in response to:

- Feedback from 2022 public consultation process
- Outcome of 2024 technical assessments supporting PC:I; and
- Consideration of 17 Summerhays Street, 216-218 Ferguson Street and Huia Street Reserve for re-zoning to medium density residential (see the Rezoning Report, October 2024 for more information).

STEP	PURPOSE	OUTPUT
STEP 4 Review and update MRZ extent	Review 2022 geospatial extent based on recommendations in technical assessments, stakeholder feedback and inclusion of additional sites	Recalculated zone extent to be included in PC:I.

4.1 Public consultation feedback

The draft MRZ extent was included in public consultation undertaken by PNCC in 2022, during which people were asked whether, amongst other questions, they:

- Agreed with the selected walking distances
- Thought there were other places and spaces that should be within walking distance for homes in the MRZ

In addition to feedback from residents across the city, the Council also received feedback from:

- Kāinga Ora
- Kiwirail
- Horizons Regional Council, and
- Ministry of Education (MOE)

4.1.1 Response to feedback

Walking distances

Feedback on the proposed walking distances included:

- Concerns that the proposed walkable catchments were too limited, and longer distances should be considered to encourage walking. Suggested amendments were:
 - Distance to parks or reserves should be 500m
 - Use walking distances of 5-15 minutes
 - Increase to 1-1.5km for distance to city centre and neighbourhood centres
- Concerns that the proposed walkable catchments should be reduced, primarily because the proposed distances are too far for older people or children to walk, it is too difficult to walk from bus stops with heavy groceries, or that larger walkable catchments will create urban sprawl. Suggested distances/concerns were:
 - 300m to neighbourhood centres
 - 500m to primary schools and 300 metres for intermediate schools
 - Reduce 500m to bus stops
 - 800m to the city centre but 500m to other areas
 - 300m away from public open space is too far away to enable a parent to keep a closer watch on children.
- Kāinga Ora suggested a walkable catchment of 400m from parks and open space.

The Council acknowledges the feedback received on the proposed walking distances. As these are based on international research and MfE's guidance for implementing the NPS-UD, no change is proposed.

One respondent also suggested improving the zone map by integrating bus stops with the most frequent bus routes and the Urban Cycle Network Master Plan, to support locating medium-density development along the public and active transport network and support modal shift. The zone extent has been determined in part by accessibility to bus stops and the recent Horizons Regional Council changes to the bus network has increased frequency to 15 minutes at peak time and 30 min frequency at non-peak times. The Transport Assessment concludes that all areas within the zone have good access to existing bus stops and all areas other than Kelvin Grove have good access to existing or planned cycling facilities.

Inclusion or exclusion of other places and spaces

A wide variety of additional areas were suggested by respondents for inclusion within the MRZ extent. The table in **Appendix C** sets out the response to this feedback. No change is proposed in response to this feedback because:

- Areas suggested for inclusion were already part of the proposed 2022 MRZ extent, or
- Areas suggested for inclusion were outside the proposed walkable catchments.
- Areas suggested for inclusion would result in greenfield expansion of the city, rather than intensification of existing urban areas.

A variety of feedback was also received about the unsuitability of some areas for inclusion in the proposed MRZ. Much of this feedback focused on a perceived change in character that would arise as a result of intensification. Policy 6 in the NPS-UD is clear that intensification may involve significant changes to an area and people will have different views about that change in terms of the impact on amenity values. That impact, however, is not in and of itself, an adverse effect.

There was some specific feedback received about the adequacy of existing services in some of the neighbourhood centres, as set out in Table 4. Several respondents also raised capacity concerns, as set out in Table 5.

Table 4: Feedback on other places and spaces

Feedback	Response
Countdown (now Woolworths) at Kelvin Grove should not be considered as a centre – there is no medical centre or pharmacy.	The lack of a medical centre or pharmacy at this neighbourhood centre is acknowledged. A review of land uses at the other neighbourhood centres shows that only some have pharmacies (Hokowhitu, Riverdale and Roslyn) and only two (Hokowhitu and Highbury) have a medical centre/primary health care facility. Choices about where medical centres and pharmacies are located are made by individual practices and business owners and they may be more aligned to employment locations rather than neighbourhood centres.
Areas for intensification should be variously within walking distance of child-care centres, libraries, hospitals, doctors, dentists, police stations, supermarkets, petrol stations, butchers, greengrocers, hairdressers, a café, places of worship, recreational facilities and vets.	See the explanation in Table 1 as to why child-care, doctors and dentists have not been considered as a key criterion for walkability. As to the remaining locations: <u>Vets</u> – are located across the city centre and beyond – it is considered most likely that access to vets would be via car rather than walking or public transport. The

Feedback	Response
	<p>choice about where to establish a practice is made by the individual business owner.</p> <p><u>Libraries</u> – primarily located in the existing business zones or neighbourhood centres, which have already been mapped for walking accessibility.</p> <p><u>Petrol stations</u> are motor-vehicle focused whereas accessibility for the MRZ is determined based on walkability and public/active transport</p> <p><u>Hairdressers and café's</u> – already addressed through mapping accessibility to the city centre and the neighbourhood centres</p> <p><u>Places of worship</u> – there are churches and other places of worship located across Palmerston North city, representing many different faiths. Decisions about where to worship are expected to be based on denomination and fit rather than being within walking distance.</p> <p><u>Butchers/greengrocers</u> – supermarkets have, in many cases, taken over the role of butchers and greengrocers. Of the neighbourhood centres included within the walking catchment for the MRZ, only the Milson shopping centre includes a butcher. There appear to be no existing greengrocers at any of the shopping centres.</p> <p><u>Recreational facilities</u> – the open space walkability criterion represents recreational facilities. Facilities with larger catchments are accessible by cycle and public transport.</p> <p><u>Hospitals</u> – there is only one hospital in Palmerston North and this serves both the city and the wider region. All residents in Palmerston North are within the catchment for this facility.</p>
Areas for intensification should be within walking distance of secondary schools	See the explanation in Table 1 as to why this is not being considered as a key criterion.
Areas for intensification should be within walking distance of the Manawatū River and Mangaone Stream walkways	One of the key criteria for establishing the proposed MRZ extent was distance to open space reserves – this includes the Mangaone Stream and Manawatū River walkways.
Areas for intensification should be in proximity to a community	There are currently only three community gardens on public land in Palmerston North. Limiting intensification

Feedback	Response
organic garden, a venue with 24/7 public access to defibrillators and community car park if there's no minimum car park requirement.	to area in proximity to these locations would not be consistent with NPS-UD requirements. The location of these gardens may also change over time.

Table 5: Capacity concerns

Feedback	Response
Schools to support medium density housing, particularly if they were already at or over capacity with existing housing density	Concerns about school capacity are acknowledged. MOE has responsibility for all providing sufficient capacity. Feedback from MOE to the draft MRZ provisions did not highlight any concerns with existing capacity, but did seek the inclusion of enabling provisions for educational facilities as part of PC:I. These provisions have been included. MOE's 2022 feedback was confirmed in the 2024 FDS – additional schools are not required to support growth, although this will be monitored ¹⁰ .
Existing neighbourhood centres, some of which are already at or over capacity	PNCC acknowledges that some existing neighbourhood centres are at or over capacity. Addressing this will require a review of the existing local business zones, which is part of a proposed future review of the ODP. Delaying PC:I until this review is complete would not meet PNCC's obligations to give effect to the NPS-UD and enabling residential intensification.

4.2 Outcome of technical assessments

PC:I is informed by various technical advice, none of which advises that the zone extent should be further reduced as a result of these assessments.

4.3 Additional sites

The Council is considering the re-zoning of three sites to Medium Density Residential:

- 17 Summerhays Street – former Terrace End Bowling Site – currently zoned part recreation and part residential in the ODP.
- Huia Street Reserve – corner of Fitzherbert Avenue and Park Road – current zoned recreation in the ODP

¹⁰ [future-development-strategy-2024-resized.pdf \(pncc.govt.nz\)](#) – page 67.

- 216-218 Ferguson Street – currently zoned local business in the ODP and occupied by a vacant site previously occupied by a martial arts studio (which subsequently moved to a different location).

Two of the sites – 17 Summerhays Street and 216 Ferguson Street – are within the 2022 draft MRZ extent. The Huia Street site is located immediately adjacent to the 2022 MRZ boundary. The site is located within or just outside of the proposed walkability catchments.

Further detail on these sites is provided in the Rezoning Report, October 2024.

5 Final proposed MRZ extent

The final proposed MRZ extent is shown in Figure 2. With the exception of the inclusion of the Huia Street site, on the corner of Fitzherbert Avenue and Park Road, the zone extent has not changed from the 2022 version which was subject to public consultation.

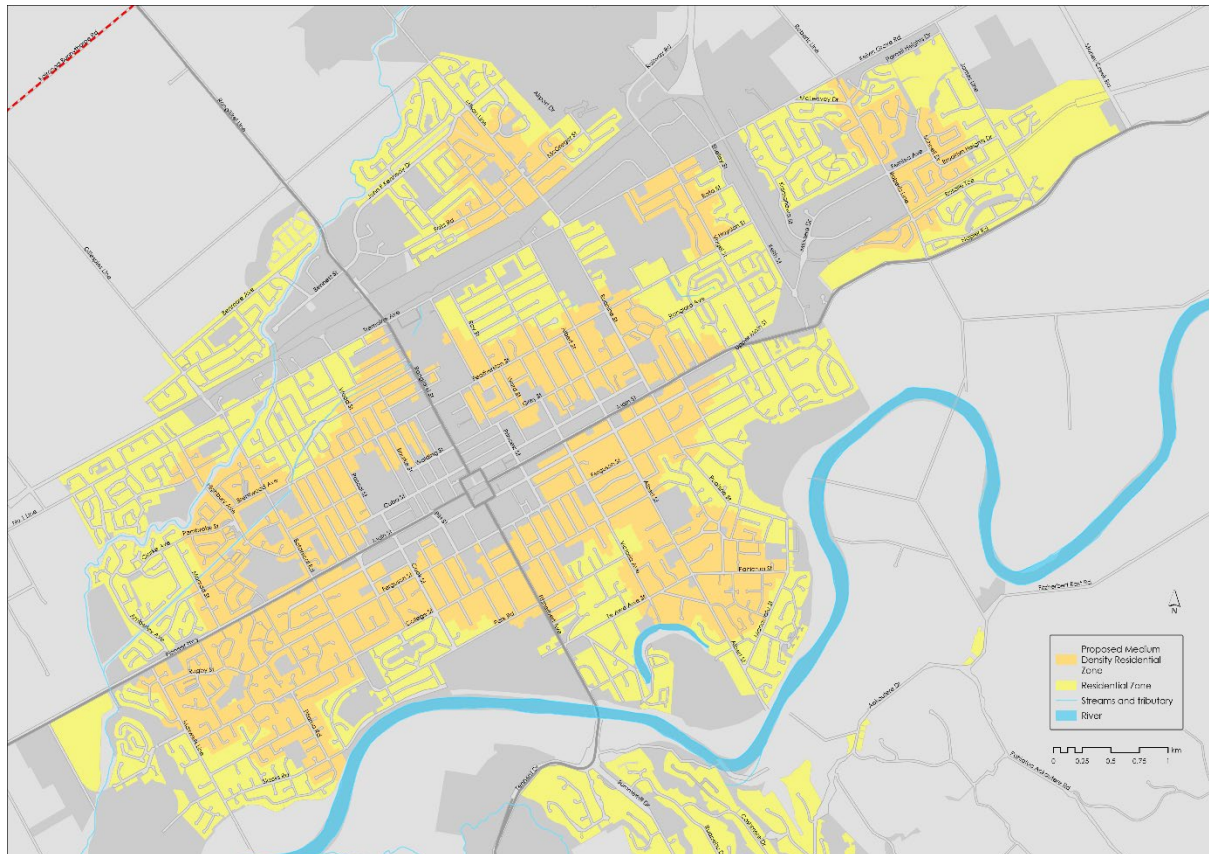


Figure 2: Proposed MRZ extent

**Appendix A. McIndoe Urban – Urban Design
Memo #8 – determining appropriate
ped-shed walking distances**

Urban Design Memo #8

To PNCC attention Michael Duindam, Sam Dowse, Dave Charnley
From Graeme McIndoe
Date 3 October 2022
Subject **Determining appropriate pedshed walking distances**

Scope

This is to address the following two questions:

- What are appropriate walking distances to neighbourhood centres, business zones, schools, open spaces and transport routes to contribute to a well-functioning urban environment.

1 Appropriate walking distances to local facilities

PNCC Question:

What are appropriate walking distances to neighbourhood centres, business zones, schools, open spaces and transport routes to contribute to a well-functioning urban environment?

General discussion

This is in the context of Policy 5 of the NPS-UD:

Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:
(a) the level of accessibility by existing or planned active or public transport to a range of commercial and community services; or
(b) the relative demand for housing and business use in that location.

Walking distances are quoted variously in terms of walking time, or actual physical distance. A common rule of thumb is that a 400m distance correlates with a 400m walking distance. NZTA's advice is as follows:

*"A typical fit and healthy adult walks about five to six km per hour. So a simple rule of thumb for undelayed walking is 10 minutes per km."*¹

The walkable catchment must be related to the actual distance along public routes with footpaths, or other safe and open pedestrian facilities.

The MfE notes:

"While the 800-metre catchment may be a good starting point, the draw of certain amenities will influence how far people are willing to walk to access them, and is likely to influence the size of a walkable catchment. While walkable catchments of 400 to 800 metres will be

¹ Waka Kotahi NZTA, *Pedestrian Planning and Design Guide*. October 2009 Page 3-5 walking speed

suitable for most tier 1 urban environments, it may be appropriate for larger tier 1 urban environments to consider greater distances in some situations.”²

“Local authorities have discretion when determining what radius best matches the likely pedshed based on the local context. This may mean, in some areas, a smaller radius of 400–600 metres, for example, is appropriate for tier 2 and 3 local authorities.”³

1.1 Neighbourhood Centres 800m

This distance would be to the boundary of the neighbourhood centres zone and is consistent with MfE guidance:

“The general rule used by many organisations, including by the Ministry for Environment’s Urban Design Toolkit (Third edition), is that a walkable catchment is often around 800 metres. The 800-metre distance was determined by assuming most people would be happy to walk 10 minutes to access services and amenities.”⁴

1.2 Primary and/or intermediate schools 800m

Convenient access to primary schools is fundamental to good quality residential development and providing for a cross-section of the community. These need to be within at most a 10–12-minute walking distance. Following the MfE guidance above, 800m is an appropriate pedshed for distance from a primary school. While 800m is a supportable distance, there might be discretion, when an area is well-served in other ways and just beyond 800m from a qualifying school, to extend the pedshed to 1000m.

Considering the types of school to determine pedsheds:

- Using distance from primary schools or intermediate schools is likely to result in areas identified for intensification that do not have walkable access to a primary school.
- Using distance from both primary schools and intermediate schools would be unnecessarily restrictive as the intermediate school would become the default. Many areas suitable for intensification and served by a primary school would not be within 800m of an intermediate school and so would be excluded.
- Using distance from an intermediate school as a criterion will lead to areas under-served for education being included within the MRZ.

The user groups of these two types of school are different. Younger primary school children are likely to walk, often with parents or caregivers, to primary school. Older and more independent intermediate school students will be able to walk further, and may cycle, so the ped-shed is likely to be greater. On the basis of a recommendation by Auckland Transport, MfE advice indicates that intermediate and secondary schools might be placed in the same category, with a 1200 metre pedshed.⁵ While acknowledging that,

² Ministry for the Environment *Understanding and implementing intensification provisions for the NPS-UD*. September 2022 Page 23.

³ Ibid Page 27

⁴ Ibid Page 23

⁵ Ibid page 23

given the increased mobility of older students we consider that access to an intermediate or secondary school should not be a factor tested.

Early childhood education facilities are also not a factor as these can generally be built on a single residential lot through a consent process, and are therefore excluded from consideration. Older children can and will travel much further to secondary schools so relation to secondary schools is not a factor.

1.3 City bus stop 600m

The MfE offers the following advice on the pedshed from public transport nodes:

“Although it is up to each local authority to determine the size of walkable catchments appropriate for local circumstances, we offer the following recommendations consistent with long-standing academic and international best practice:

1. A distance of 800 metres from each main entrance to a transit stop is considered a minimum walkable catchment in all urban areas.”⁶

The suitability of this depends on the frequency of the bus service, and the relevance of the destinations that it takes bus users to. If the city bus network does not offer a high frequency service over extended hours, and access to and from an interconnected range of important destinations, then ‘city bus stop’ may not be a relevant consideration. That is, if the bus service is at best poor, then it may unnecessarily preclude areas which would otherwise be suitable for intensification.

However, taking a conservative approach with the view that some bus service is better than nothing, this factor would be applied. Given that the MfE guidance of an 800m pedshed relates to a railway station or rapid transit stop, then a reduced pedshed of 600m is appropriate if a city bus stop is used in Palmerston North.

1.4 Open space reserve 300m with scope to extend to 400m

An ‘open space reserve’ is defined by PNCC as having the following characteristics:

List – supplied by PNCC

A general rule of thumb is that a local park with active play and playground should be available within 400m of each dwelling in a medium density residential area. That allows for a 5-minute walk to these facilities which are fundamental to serving a local neighbourhood and must be readily accessible for short trips. This close access becomes particularly important for high density housing such as any apartments which do not provide extensive private outdoor space suitable for active play. The type of facility would be kickabout open spaces and parks, playgrounds as distinct from a large sports field or other whole of suburb or regional facilities which users will travel much further to visit.

⁶ Ibid page 24

300m provides an enhanced level of access, trading off access enhancement with a slight restriction on the extent of the MRZ. This approach is consistent with the findings of research and professional evidence:

- Evidence demonstrates that particularly for young people, the closer a park is the more likely that they will use it or will be allowed by their parents or caregivers to use it.
- Harnik notes that “residents are more likely to use a park if it is close by”, but notes that there is significant variation depending on the potential user type and the facilities available.⁷ He identifies scenarios where a teenager might walk 400m to a local park, an elderly person might walk 200m or so to sit in a park, children in an apartment might be allowed to play if supervised by a 12 year old 100m from home; and a time-pressured pregnant mother might walk 100m to take a toddler to a playground.
- In a review of secondary research data in the US, Walker and Crompton conclude that people “who perceived they had the ability to access a park on foot or by bicycle were 9% more likely to use parks.”⁸ They cite other studies, including that the walk to the park is important as affording people “opportunities for escape, contemplation and restoration”. A 2005 Australian study⁹ cited reported that for the majority of small park users surveyed in Australia lived within a 500m radius of the park, and “distance was their primary constraint to park use”.
- The role of recreational attributes in attracting park use was also acknowledged. Harnik and others identify that the amenity and activities offered by a park also determine willingness to access it. Other research shows that the opportunities for recreation that the park affords also influences potential use.¹⁰
- The need for proximity of play space varies by the age of the users of that space. Supplementary Planning Guidance from the UK states that off-site play provision for the 5-11 year age group should be within 400m and for those aged 12+, within 800m.¹¹
- The recommendation of close proximity of local parks is confirmed by The Smart Growth Manual: “Within the neighbourhood, playgrounds and tot lots should be distributed so as to be within a two-minute walk of most households.”¹²

Therefore, it is both logical and supportable that a 300m distance to local neighbourhood parks is used in modelling for zone boundaries. There may

⁷ Harnik, P. *Urban Green: Innovative Parks for Resurgent Cities*. (Island Press, Washington 2010.) Pages 27-32

⁸ Walker J.R., and Crompton J.L. *Journal of Park and Recreation Administration* Volume 30, Number 3. The Relationship of Household Proximity to Park Use. Pp 52-63

⁹ Giles-Corti et al, cited by Walker and Crompton

¹⁰ Kaczynski et al. *International Journal of Behavioural Nutrition and Physical Activity* (2014) 11:146 *Are park proximity and park features related to park use and park-based physical activity among adults? Variations by multiple socio-demographic characteristics*. Also Moran, M. et al. *Park use, perceived park proximity, and neighbourhood characteristics: Evidence from 11 cities in Latin America*. *Cities: the International Journal of Urban policy and Planning*. 105 (2020) 102817 Elsevier.

¹¹ Mayor of London. *Supplementary Planning Guidance: Providing for children and young people's play and informal recreation*. 2008 (table 4.7)

¹² Duany, A; Lydon, M; and Speck, J: *The Smart Growth Manual* (McGraw Hill, 2010) Section 6.3 Pocket Parks.

also be scope to extend the distance to 400m in discretionary situations where land has otherwise excellent access to other determining facilities such as local shops and high frequency public transport stops.

End.

Appendix B. Assessment of relative demand

Palmerston North 2023 Housing Business Development Capacity Assessment

The 2023 HBA estimated an overall demand (including in existing urban areas and rural areas) in Palmerston North City for:

- 983 homes in the short term (within the next 3 years)
- 3,010 homes in the medium term (between 3 – 10 years from now)
- 5,891 homes in the long term (between 10 – 30 years from now)

Over the next 30 years, the HBA estimated demand in the existing urban areas for:

- 541 homes in the short term
- 1,354 homes in the medium term
- 2,357 homes in the long term

And for attached dwellings, which represent common medium density typologies such as apartments and terraced housing, demand for:

- 118 homes in the short term
- 421 homes in the medium term
- 1,296 homes in the long term¹¹

The HBA estimated demand for attached dwellings (the typology considered the most likely to be medium density housing) is considered to be conservative¹². This is because it is based on the growth rate of historic multi-unit housing¹³ building consents and does not include any analysis of other factors that may drive demand for medium density housing, such as:

- changes in demographics, including projected growth in household types that need smaller homes;
- housing affordability; and
- need for social housing.

¹¹ 30-year totals are: 9,884 homes district wide, 4,252 homes in the existing urban environment, 1,835 for attached homes.

¹² PNCC Housing and Business Needs Assessment 2023, page 51.

¹³ Multi-unit housing is a development type provided for in the Palmerston North District Plan. It is defined as "three or more self-contained dwelling units that are located on one site. A multi-unit residential development includes but is not limited to apartment buildings, and terrace housing." It is considered a reasonable proxy for medium density housing.

Further, the HBA does not analyse whether there are differences in demand for various housing typologies in different locations in the urban environment, or the relative demand for different typologies (e.g. duplexes, townhouses, apartments, etc).

Since the HBA was published, infrastructure servicing of the city's greenfield growth areas is proposed to be delayed as part of the 2024-2034 Long Term Plan. At least in the short-medium term, development within the existing urban environment will be necessary to meet housing demand if greenfield supply is delayed. This may be a driver for achieving higher densities through intensification.

Palmerston North Population Projections

Palmerston North's latest population projections¹⁴ include projections for household type, family type, and household size from 2018 – 2053.

Figure 3 shows the projected change in different household types until 2053. Growth rates by household type over the next 30 years are predicted to be:

- Family households - 39% increase (+ 8,723);
- Other multi-person households - 2% increase (+ 51); and
- One person householders - 27% increase (+ 1,546).

The projected growth rate of 27% for one person households is expected to drive demand for smaller 1 – 2 bedroom homes, which medium density housing such as apartments, duplexes and terraced housing are likely to cater for. If projected growth as identified in the 2023 HBA is accurate, then an additional 1,546 smaller homes may be required within the district in the 30-year period to 2054.

¹⁴ The projections are a hybrid model, based on the Statistics New Zealand population projections released in April 2023 and a medium growth scenario projection prepared by Infometrics, for 2024-2054.

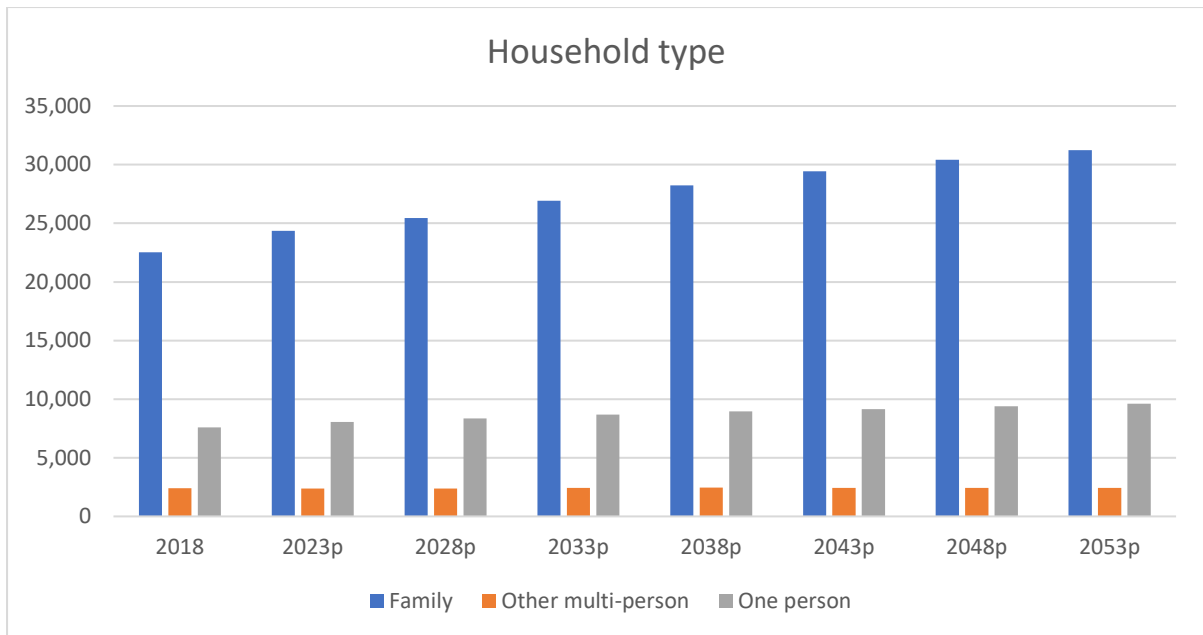


Figure 3: projected household types in Palmerston North 2018-2053

Figure 4 shows how different family types are projected to grow and change over the next 30 years:

- Couples without children - 35% (+ 3,227) increase
- Two parent families – increase of 45% (+ 4,287)
- One parent families - 34% (+ 1,471) increase.

The growth in couples without children over the next 30 years may contribute to a demand for the smaller 1-2 bedroom homes. Depending on the housing needs of one parent families, the growth in that family type could also drive demand for smaller homes on smaller sites.

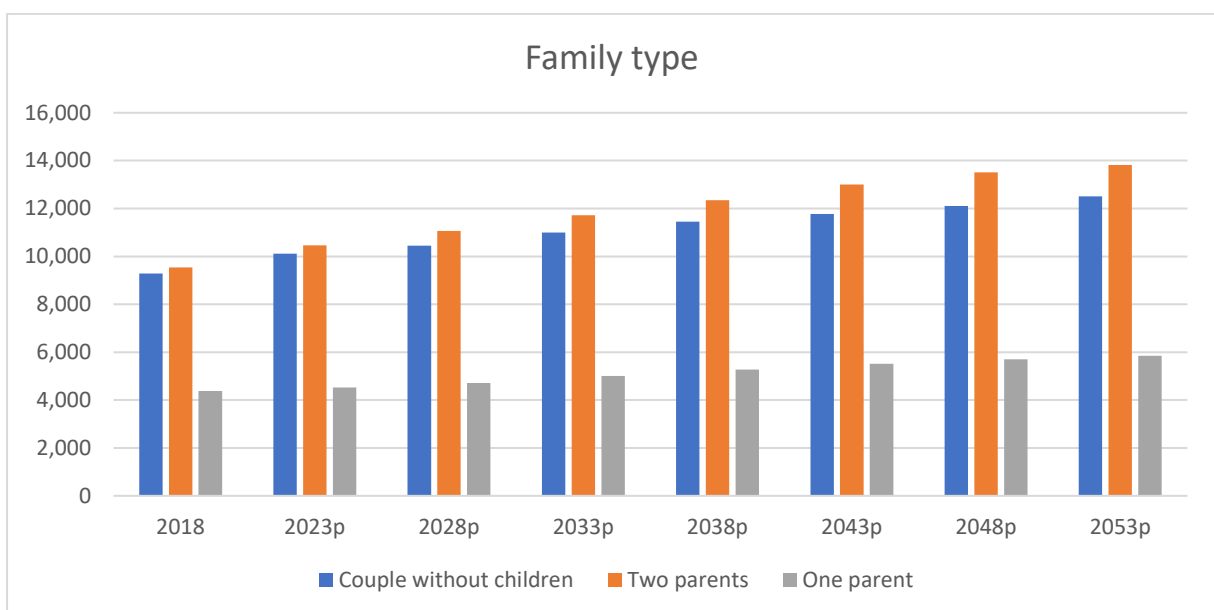


Figure 4: Projected family composition in Palmerston North 2018-2053

Figure 5 shows the projected average household size over the next 30 years. Throughout the 30-year period, the average household size fluctuates between 2.64 and 2.65, which represents a very marginal increase on the average household size in 2018 (2.63). This average household size is likely to be influenced by the projected increases in the number of Māori and Pasifika families, which will increase the number of multi-generational and larger households in the city¹⁵. The trend in average household size does not signal a particular demand for smaller dwellings.

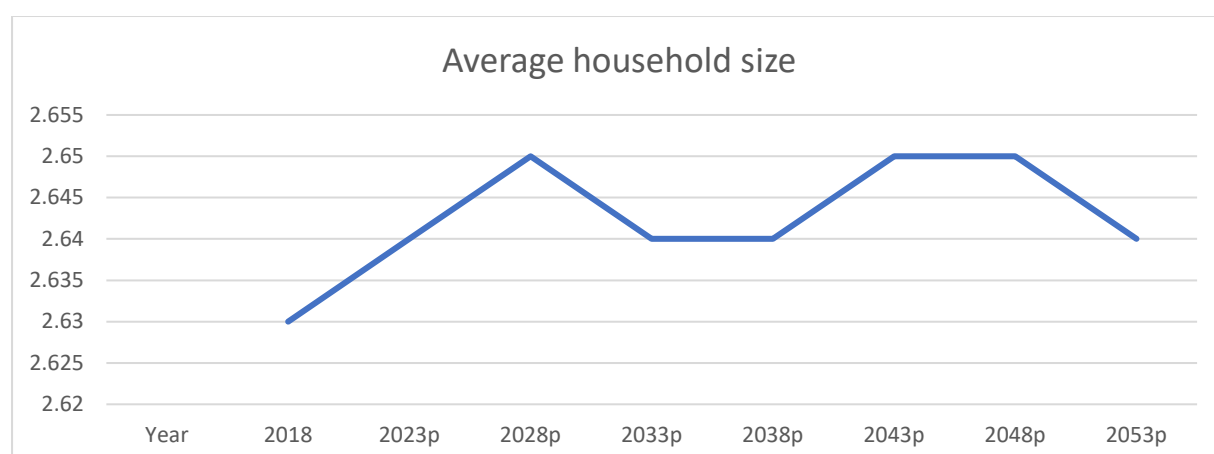


Figure 5: Project average household size in Palmerston North, 2018-2053

The population projections also include projections by age groups. As shown in Figure 6, there is a marked projected increase (116%, +14,383) in those aged 65 and over by 2053. This growth in the populated aged 65 and over could drive demand for retirement villages and for smaller homes for those who prefer to 'age in place'.

¹⁵ Palmerston North Housing and Business Development Capacity Assessment, 2023, page 34.

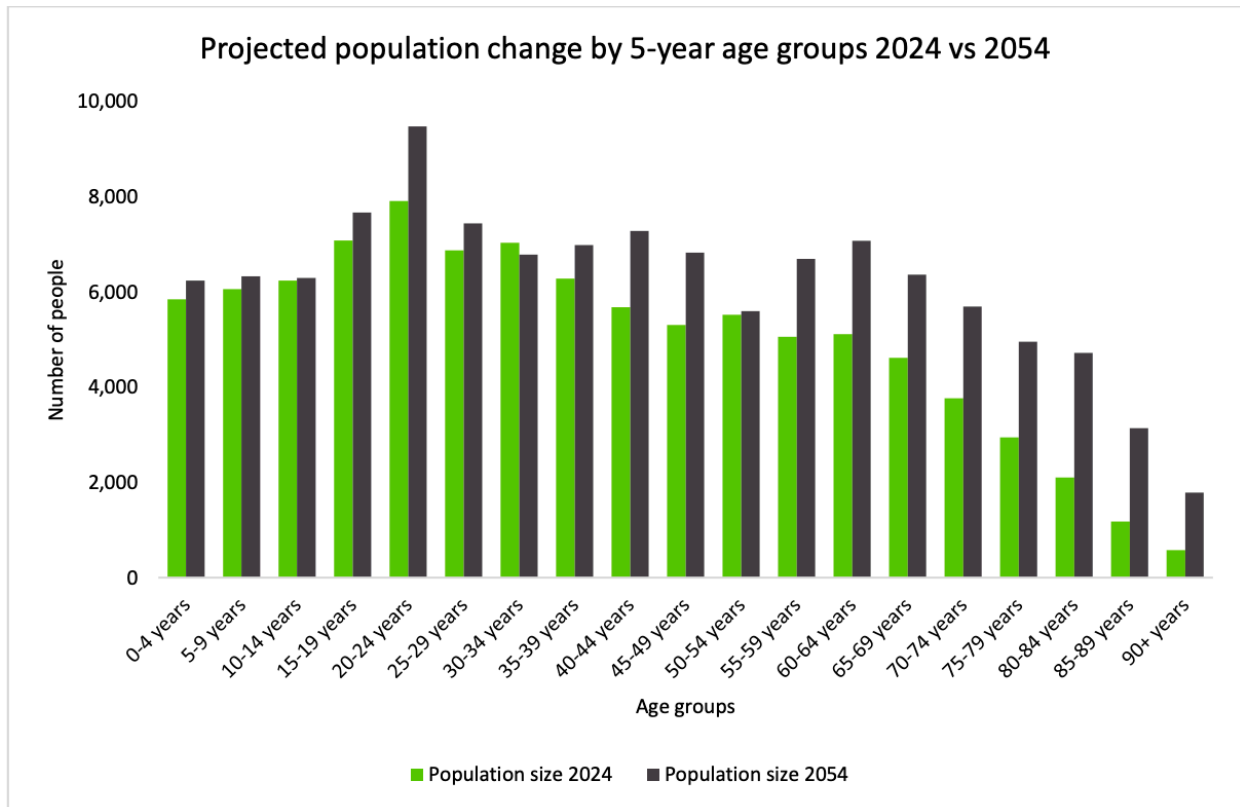


Figure 6: Projected Palmerston North city population by age group, 2024-2054

Building Consent Data

Section 3.1 of the HBA provides a detailed assessment of residential construction trends, including the types of dwellings being constructed, the location and size.

Historic building consent data from 1999-2023 (which provides an understanding of historic demand), shows that the annual average rate of delivery of apartments/retirement villages/multi-unit/other housing typologies is 29 units per year. In the period 2013 – 2023 the annual average rate has been 40 per year. Unfortunately, there is no readily available data which shows the contribution that each of these dwelling types makes to this overall average.

The most up to date building consent data (31 April 2024), (which now tracks typologies), shows that of the 267 dwellings granted building consent between January 2023 – April 2024:

- 66% of dwellings were built within the existing urban area in 2023 and 56% in 2024.
- 13% of consents granted during this period were for attached dwellings and 85% were for detached dwellings
- 19% of those dwellings granted building consent in 2023 and 2024 were multi-unit housing types (the map on page 14 shows the location of granted building consents) with:
 - 12% being minor dwellings

- 25% being apartments
- 35% being terraced housing
- 10% being detached multi-unit
- 18% being semi-detached.

Figure 7 maps the location of building consents for multi-unit housing developments (yellow), along with brownfield sites that have been redeveloped for housing (orange).



Figure 7: Issued building consents for multi-unit developments in Palmerston North 2018-2023

Figure 7 shows that multi-unit housing developments have been constructed at various locations across the city, with clusters in the city centre, and in the suburbs of Roslyn, Hokowhitu, Awapuni and Takaro (the developments in these suburbs were primarily undertaken by Kāinga Ora). These developments were undertaken by a variety of developers including public, Māori and private developers.

During 2023, Kāinga Ora was granted building consent for 14 multi-unit housing developments were granted building consent, which included some apartments. In relation to Kāinga Ora developments:

- The minimum number of homes delivered per redeveloped site was four, the maximum 50 and the average 15.
- The minimum, maximum and average site size was 142m², 180m², and 164m² respectively, noting that these calculations are based on dividing the site size by the number of units.

- The maximum number of stories was three.

Social Housing Register

The Ministry of Social Development's Housing Register includes the number of applicants by territorial authority eligible for social housing who are ready to be matched to a suitable property. The latest dataset was released in June 2024 and for Palmerston North reported (Figure 8) that there are currently 546 people on the Housing Register and the demand is predominantly for smaller 1 and 2 bedroom homes:

- There are 309 applicants on the register for a 1 bedroom home.
- There are 138 applicants on the register for a 2 bedroom home.

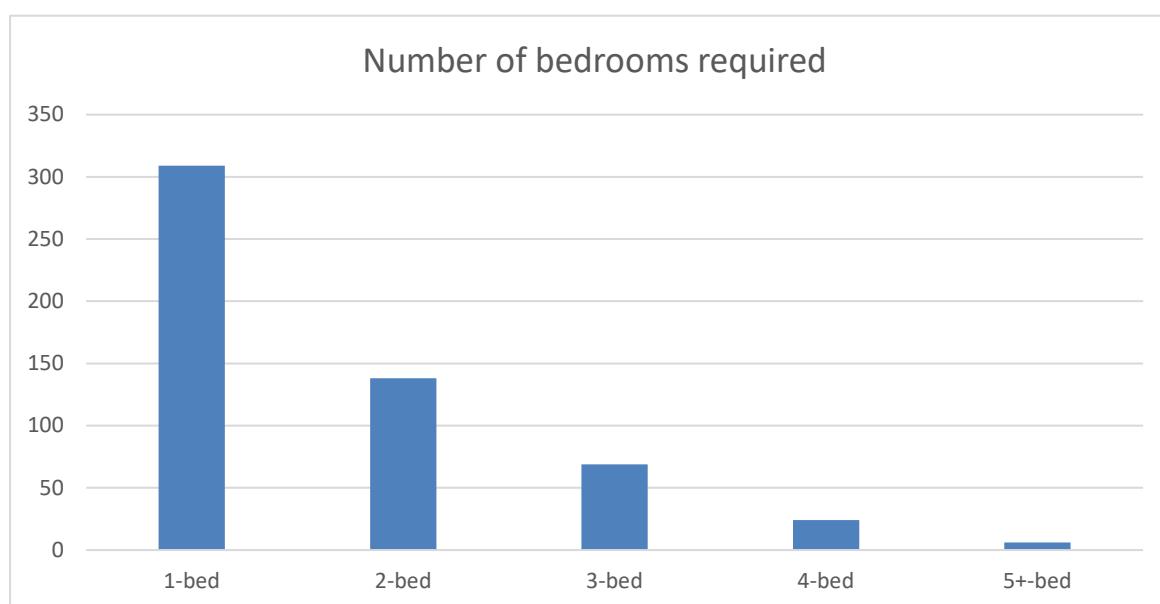


Figure 8: Housing Register requirements by number of bedrooms in Palmerston North, at June 2024¹⁶

Employment and City/Neighbourhood City Centres and Medium Density Development

The extent of the five most significant areas of employment (based on density of jobs) have been mapped. These areas include Palmerston North Hospital, the Tremain Avenue and Keith Street industrial areas, Massey University and the central business district. These areas have been overlaid with multi-unit developments granted building consents between 2018 and 2023 (shown in yellow).

Figure 9 shows that accessibility to these employment centres does not correlate strongly with the location of medium density housing. There appears to be a cluster of multi-unit housing consented along the industrial enclave on Keith Street and Tremain Avenue in

¹⁶ [Housing Register - Ministry of Social Development \(msd.govt.nz\)](https://msd.govt.nz/) – accessed 11 September 2024.

Roslyn, and clusters of multi-unit housing in the city centre. This may indicate that demand for medium density, in part, is driven by accessibility to areas of employment.

Similarly, recent multi-unit developments and brownfield redevelopments within proximity to the larger Awapuni, Hokowhitu, Highbury and Milson neighbourhood centres¹⁷ and the city centre have been mapped. Figure 10 shows that proximity to the city centre and the larger neighbourhood centres may be an indicator of higher relative demand for multi-unit development. In Roslyn there is a neighbourhood centre containing ~11 tenancies (shown in red on the map). The cluster of consents in close proximity to this centre may be an indicator of relatively higher demand in this area.

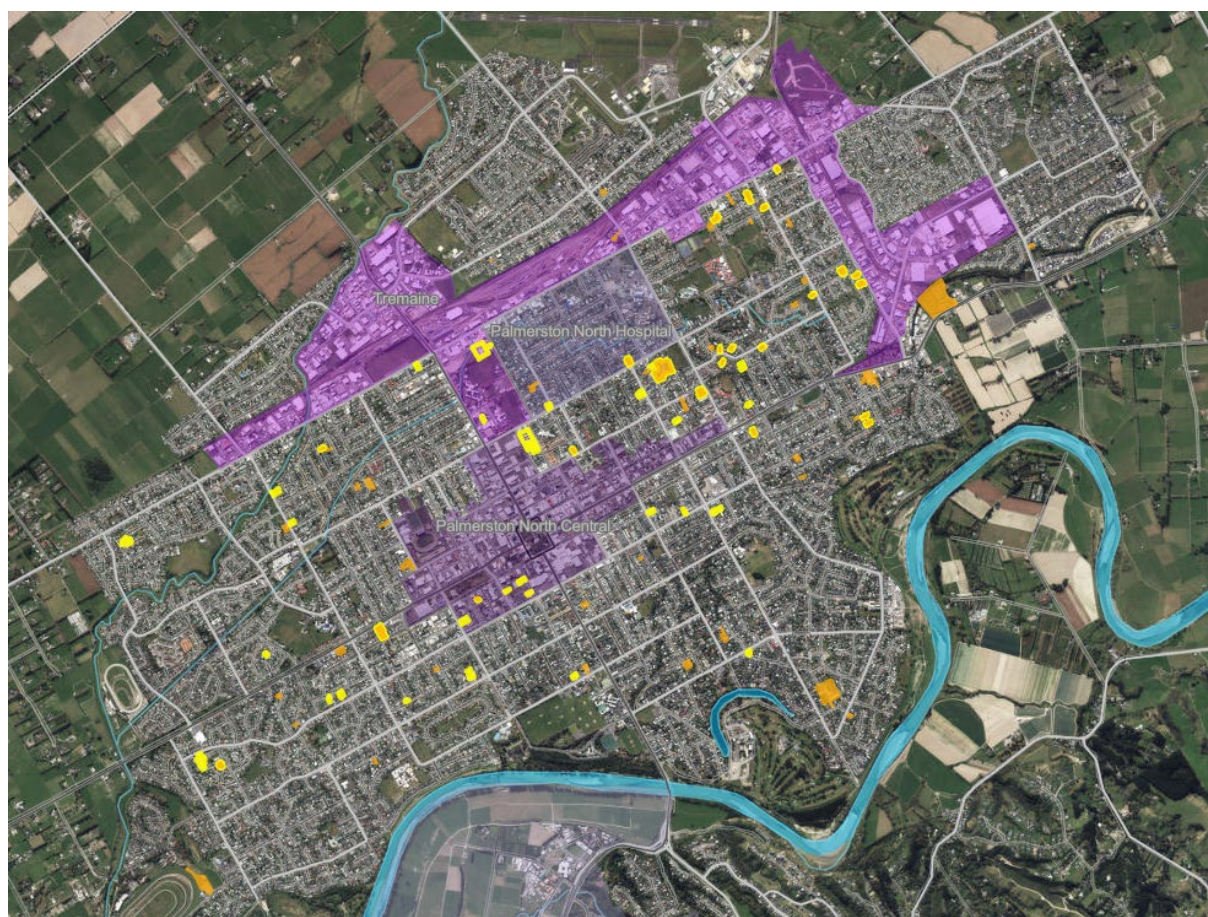


Figure 9: Location of multi-unit developments and significant areas of employment in Palmerston North (2018-2023)

¹⁷ These are classified as large neighbourhood centres in the District Plan.

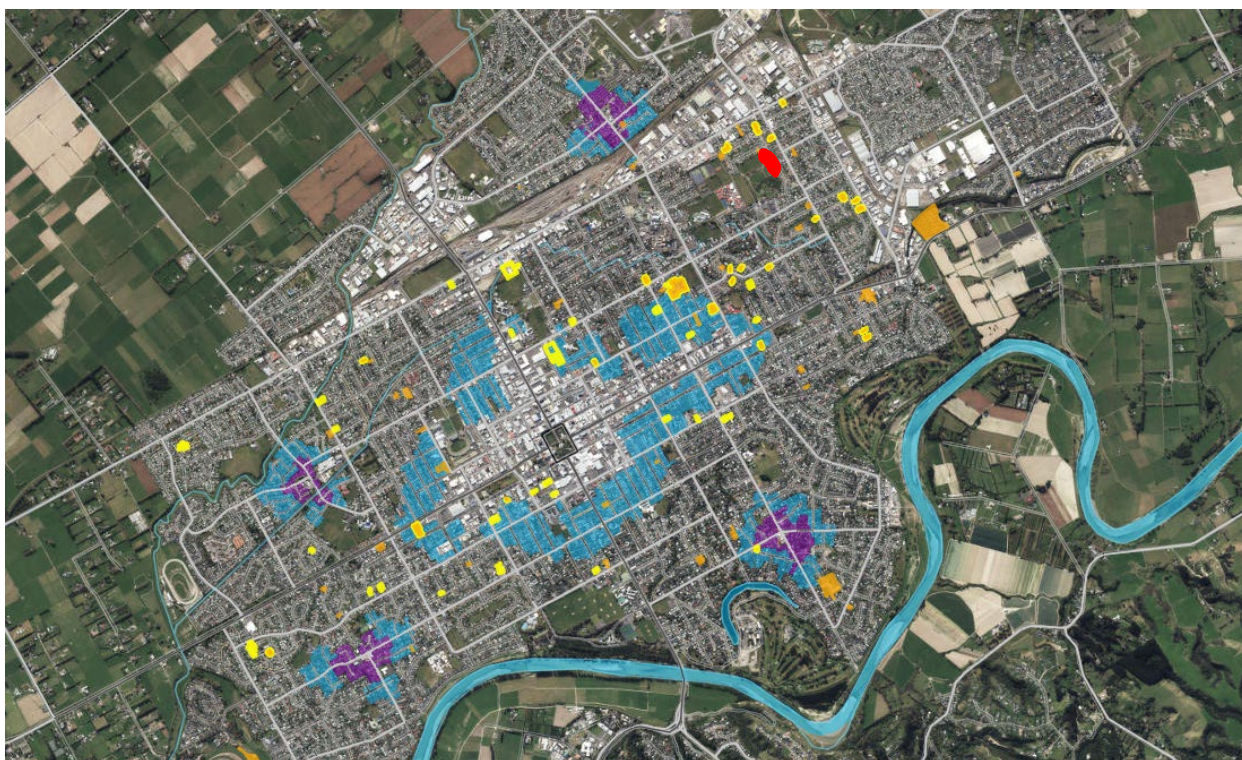


Figure 10: Location of recently consented (2018-2023) multi-unit developments and large neighbourhood centres in Palmerston North

Appendix C. Response to feedback on additional areas for inclusion in MRZ

Additional area to include	Response
All areas of the city	No change – consistent with Policy 5 of the NPS-UD, the MRZ extent is determined by the walkability catchments and the relative level of demand.
Include the area between Ruahine Street, Featherston Street, Hayden and Keith Streets, in Roslyn.	No change – part of this area is already included in the proposed MRZ extent. The remaining area does not meet one or more of the walkability criteria and hence has been excluded.
Parkland Crescent	No change – whilst properties in Parkland Crescent are within the walkable catchments of bus stops and Parkland School, they are considerably more than 800m away from a Neighbourhood Centre or the city centre.
Roslyn, including Ngarimu Street	No change - those parts of Roslyn which are within the proposed walkable catchments were already included in the 2022 zone extent. Ngarimu Street is more than 800m away from a Neighbourhood Centre or the city centre.
Terrace End	No change - those parts of Terrace End which are within the proposed walkable catchments were already included in the 2022 zone extent
Kelvin Grove on the Roslyn side	No change – Kelvin Grove on the Roslyn side is outside the proposed walkable catchments.
Te Awe Awe Street	No change - those parts of Te Awe Awe Street which are within the proposed walkable catchments were already included in the 2022 zone extent.
Fitzherbert Avenue	No change - those parts of Fitzherbert Avenue which are within the proposed walkable catchments were already included in the 2022 zone extent.
Aokautere	No change - Aokautere was excluded from the proposed MRZ as this area was subject to a plan change in 2023 (PC:G), which included introducing provisions to enable medium density housing.
Linton	No change - Linton was excluded from the proposed MRZ as the focus on PC:I is the existing urban areas of Palmerston

Additional area to include	Response
	North city rather than greenfield expansion on the edges of the city or in other towns in the district.
Whakarongo	No change - Whakarongo was excluded from the proposed MRZ as the focus on PC:I is the existing urban areas of Palmerston North city rather than greenfield expansion on the edges of the city or in other towns in the district.
Ashhurst	No change - Ashhurst was excluded from the proposed MRZ as the focus on PC:I is the existing urban areas of Palmerston North city rather than greenfield expansion on the edges of the city or in other towns in the district.
Milson	No change - those parts of Milson which are within the proposed walkable catchments were already included in the 2022 zone extent.
Fernlea	No change - those parts of Fernlea which are within the proposed walkable catchments were already included in the proposed 2022 zone extent.
Summerhill	No change - Summerhill was excluded from the extent of PC:I as this area was subject to a plan change in 2023 (PC:G), which included introducing provisions to enable medium density housing.
River end of Albert Street	No change - the river end of Albert Street was excluded from the proposed 2022 MRZ extent because it does not fall within the proposed walkable catchments for the Hokowhitu Neighbourhood Centre or a primary/intermediate school.
Longburn	No change - Longburn was excluded from the proposed 2022 MRZ extent as the focus on PC:I is the existing urban areas of Palmerston North city rather than greenfield expansion on the edges of the city or in other towns in the district.
Park Road at the back of West End School, and along the east side from the Lido to Botanical Road	No change - part of Park Road near the intersection with Fitzherbert Avenue was already included in the proposed 2022 MRZ extent. The remainder of Park Road has been excluded as it does not fall within the proposed walkable catchments for access to either the city centre or Neighbourhood Centres and access to bus stops.

Additional area to include	Response
Remaining half of Roy Street	No change – the remaining half of Roy Street is outside the walkable catchments for Neighbourhood Centres/the city centre and open space reserves.
Area surrounding Russell School	No change – the area around Russell Street is outside the walkable catchments for Neighbourhood Centres/the city centre and open space reserves
33 – 68 Newcastle Street	No change – whilst these properties are within the walkable catchments for bus stops, open space reserves and a primary/intermediate school they are not within the walkable catchment for the Hokowhitu Neighbourhood Centre and they are not part of the existing MUHA extent. They are outside the logical edge for the proposed zone.
455 – 459 Albert Street	No change - whilst these properties are within the walkable catchments for bus stops, open space reserves and the Hokowhitu Neighbourhood Centre. However, these properties are not within the walking catchment for primary or intermediate schools and they are not part of the existing MUHA extent. They are outside the logical edge for the proposed zone.
Collingwood Street	No change - Collingwood Street was excluded from the proposed 2022 MRZ extent because it does not fall within the proposed walkable catchments.
Cook Street	No change - parts of Cook Street, to the south of Joseph Street, were already included the proposed 2022 MRZ extent. The remainder was excluded because it is zoned in the ODP for non-residential purposes, such as recreational, or for business activities.
Church Street	No change - parts of Church Street were already included in the proposed 2022 MRZ extent – to the west of West Street and to the east of Princess Street. The remainder was excluded because it is zoned in the ODP for non-residential purposes, such as recreational, or for business activities.
Ferguson Street	No change - with the exception of the area between Pitt Street and Milverton Park, Ferguson Street was already included in the proposed 2022 MRZ extent. The remainder was excluded because it was already zoned in the ODP for non-residential purposes.
Main Street	No change - parts of Main Street were already included in the proposed 2022 MRZ extent - to the west of Lyndhurst Street and on the south side of Main Street to the east of

Additional area to include	Response
	Victoria Street. The remainder was excluded because it is zoned for non-residential activities.
Cuba Street	No change - the western end of Cuba Street was already included in the proposed 2022 MRZ extent. The remainder was excluded because it is zoned for non-residential activities.
Queen Street	No change - Queen Street was excluded from the proposed 2022 MRZ extent because it is zoned for non-residential activities.
King Street	No change - King Street was excluded from the proposed 2022 MRZ extent because it is zoned for non-residential activities.
Stanley Street (assume this is Stanley Avenue)	No change - Stanley Avenue was excluded from the proposed 2022 MRZ extent because it does not fall within the proposed walkable catchments.
Victoria Avenue	No change – parts of Victoria Avenue were already included in the proposed 2022 MRZ extent. Those limited areas that weren't included were outside the proposed walkable catchments or they were zoned non-residential in the ODP.
Near the Square	No change - the area around the Square was excluded from the proposed 2022 MRZ extent because it is zoned for non-residential activities.
Near The Esplanade	No change - the area near The Esplanade was excluded from the proposed 2022 MRZ extent because it does not fall within the proposed walkable catchments.
Near Massey University	No change – this area does not fall within the proposed walkable catchments.
Near UCOL (assume this is on the corner of Grey and Princess Streets)	No change – whilst the area immediately surrounding UCOL is zoned for business purposes in the ODP and hence not proposed for MRZ, areas a short distance away to the north-east were included in the proposed 2022 MRZ extent.
Near the Plaza	No change - the area near the Plaza was excluded from the proposed 2022 MRZ extent because it is currently zoned for business purposes in the ODP.

Additional area to include	Response
Near the Airport	No change - parts of Milson (near the airport) which are within the proposed walkable catchments were already included in the 2022 zone extent.
Campbell Street	No change - Campbell Street was already included in the proposed 2022 MRZ extent.
Bourke Street	No change - those parts of Bourke Street which are located within the proposed walkable catchments were already included in the proposed 2022 MRZ extent.
Willis Street	No change - Willis Street was excluded from the proposed 2022 MRZ extent because it is zoned for non-residential activities.
Domain Street	No change - Domain Street was excluded from the proposed 2022 MRZ extent because it is zoned for non-residential activities.
McGiffert Street	No change - McGiffert Street was already included in proposed 2022 MRZ extent.
Cleland Street	No change - Cleland Street was already included in proposed 2022 MRZ extent.
Cloverlea	No change - Cloverlea was excluded from the proposed 2022 MRZ as properties in this suburb did not fall within the proposed walkable catchments and it wasn't part of the ODP MUHA.
Vogel Street	No change - Vogel Street is within Roslyn, which was already included in the proposed 2022 MRZ extent.
Tremaine Avenue	No change - Tremaine Avenue was excluded from the proposed 2022 MRZ extent because, with the exception of a small area to the west of the intersection with Rangitikei Street, the area is outside the proposed walkable catchments.
Amberly Avenue	No change - Amberley Avenue was excluded from the proposed 2022 MRZ extent because this area is located outside the proposed walkable catchments.
Rangitikei Street	No change - Rangitikei Street was excluded from the proposed 2022 MRZ extent because it is zoned for non-residential activities.

Additional area to include	Response
Ruahine Street	No change - those parts of Ruahine Street which are located within the proposed walkable catchments, generally between Featherson Street to the north and Luton Street to the south, were already included within the proposed 2022 MRZ extent. The remainder of Ruahine Street was excluded because it is located outside the proposed walkable catchments.
Manawatu Street	No change - Manawatu Street was excluded from the proposed 2022 MRZ extent because this area is located outside the proposed walkable catchments.

