PROPOSED PLAN CHANGE C: KAKATANGIATA

STAGE 1: KIKIWHENUA RESIDENTIAL AREA

For

PALMERSTON NORTH CITY COUNCIL

N1447PCC – FINAL
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ACOUSAFE CONSULTING & ENGINEERING LTD

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1. Introduction

Proposed Plan Change C (PPCC) seeks to rezone land on the eastern side of Te Wanaka Road for Residential development, proposed as the Kikiwhenua Residential Area. The land is currently in the Race Training Zone.

Acousafe’s brief is:

PNCC requires technical advice to suggest how the plan could adequately manage the actual and potential noise effects on new Residential Activities as the site is redeveloped. This will feed into the s.32 report for PPCC. The ability for the site to function as a residential environment whilst mitigating the effects of a local arterial road and cross boundary effects with neighbouring rural and race training activities is of particular interest for this plan change.

Nigel Lloyd toured the site and surroundings with council officers on 18 April 2018.

2. The Proposed Plan Change

The proposal is to rezone land to the south of Pioneer Highway. The following map shows the general area of the rezoning which is bounded by the Mangaone Stream and Te Wanaka Road.
The land is a mixture of low density residential dwellings set among stables and race training facilities. Our understanding is that race training is becoming more centralised towards the southern end of Te Wanaka Road (closer to the Awapuni Racecourse) making some of the land excess to requirement.

3. **District Plan – Noise Rules**

The site is currently zoned Race Training which was subject to review as part of Plan Change 21. The noise rule (which is subject to appeal by the New Zealand Defence Force) is as follows:

Noise from any activity shall not exceed the following at any point within any land zoned Residential or at any point within the boundary of any land in the Rural Zone or Race Training Zone other than land on which the activity takes place:

- 5:00 am to 8:00 pm: 50 dB $L_{Aeq(15mins)}$
- 8:00 pm to 5:00 am: 40 dB $L_{Aeq(15mins)}$
- Night-time $L_{max}$: 75 dBA $L_{max}$

**Explanation**
The nature of this Zone means that there is the potential for noise effects very early in the morning when most training activities commence. Consequently, the noise standards used are similar to those in the Rural Zone, and the daytime hours in which they apply commence earlier in this Zone and correspondingly finish earlier. This allows a noise standard which reflects the nature of the Zone.

The noise rules for the Residential Zone were reviewed as part of Plan Change 20 and are set out in R10.9.6.1 as follows:

Sound emissions from any fixed mechanical plant, or from any non-residential activity, and from all mechanical plant, such as heating and ventilating plant and generators of a residential activity, when measured at or within the boundary of any other site (other than land from which the noise is emitted or a road) shall not exceed the following:

- **7.00 am to 10.00 pm**: 45dB $L_{Aeq(15mins)}$
- **10:00 pm to 7:00 am**: 40dB $L_{Aeq(15mins)}$
- **Night-time $L_{max}$ 10:00 pm to 7:00 am**: 65dBA $L_{max}$

The noise limits in the Residential Zone have been updated as part of Plan Change 20 in accordance with the latest version of NZS6802:2008 *Acoustics - Environmental Noise*, including changing to $L_{Aeq}$ rather than the $L_{10}$ standard in the Operative Plan.

Methods for monitoring and assessing noise are set out in Section 6.2 of the District Plan.

We consider that the noise limits and the activity statuses that are generally applied throughout the Residential Zone can be applied to the Kikiwhenua Residential Area once it becomes rezoned to Residential as part of PPCC.

### 4. Other Zone Interfaces

The Residential Zone also borders many other Zones in the District. There will be a number of new zone boundary interfaces (Rural (across Pioneer Highway), Residential (across the Mangaone Stream), and Race Training across Te Wanaka Road) and it is not proposed to provide for protection at these interfaces i.e. from the Residential Zone to other Zones, given the lesser need for noise protection outside of the Residential Zone.

### 5. Reverse Sensitivity

There is a need to establish compatible land use planning controls to appropriately protect the health and wellbeing of people living near to noise generators and to protect those generators against reverse sensitivity issues associated with people and communities coming to the noise and then complaining.

The Race Training Zone noise limits are unusual in that they allow greater noise levels to be generated early in the morning. This is compensated for by applying the night-time limits commencing at 8pm. This provides for a 9 hour period of sleep.
These limits accommodate the early morning commencement times for horse training.

Figure 2. Location of Horse Exercise Machines (Purple Dots)

The Race Training noise limits apply at or within the boundary of any land (other than the land on which the activity takes place) irrespective of whether the other land is zoned Race Training or Residential. Rezoning the land from Race Training to Residential therefore makes no difference to the duty of land owners who remain in the Race Training Zone.

Early discussions have taken place between Council and the CEO of the Awapuni Racecourse about any potential noise generating activities during usual horse training routines. This identified horse walking machines, which operate on a small electric motor. Two horse walking machines currently operate in the general plan change area, one of which is very close to existing residential premises. These are shown as the purple dots in Figure 2. If these machines are to be inside the new residential zone then they will be faced with more restrictive noise limits and would lose the benefit of the relaxed limits allowing the early morning start.
Our approach to this situation in the past has been to apply the residential zone limits to the new activities which can continue if they can comply with those limits or if they can show that they have existing use rights. This will inevitably result in a migration of horse training activities to outside the Residential Zone as residential development takes place. This is not an ideal situation but is the unfortunate side effect of an area in transition. Our preference for rezoning land is to establish the noise limits that adequately protects the new activity, in this case residential development. The alternative is to exempt race training activity from the Residential Zone noise limits and to continue to apply the Race Training Zone limits. These limits are not ideal for protecting residential amenity (particularly in the early morning) if applied within the Residential Zone.

While there will be some potential impositions to living next to the horse training area we consider that the early morning noise should not be overly excessive and would be outweighed by the benefits of residing in this area of otherwise pleasant amenity.

6. Roading

At its northern edge the PPCC land is adjacent to Pioneer Highway which is SH56. This assessment assumes that Pioneer Highway will become a local road and that the speed limit will change to 50/60km/hr.

Council has been in contact with NZTA\(^1\) explaining the need for new households in the City and discussing the strategic work completed over the last decade on the Joint Transport Study and other studies which all signal that it is unlikely that the affected portions of SH56 will remain state highway in the medium term. The most likely scenario is that SH56 will be a local road, managed by Council, with lower speeds and different objectives to a state highway.

There is nothing in the District Plan that controls development in relation to local roads. In their response to council NZTA\(^2\) states that it is important to maintain some protection *over the strategic, arterial, transport network*. Pioneer Highway will clearly remain a high trafficked road even should the state highway designation be lifted. To protect residential amenity, we recommend that a minimum 20 metres setback from Pioneer Highway be incorporated in the structure plan. In discussion with council officers we recommended that the 20 metre set back should be a landscaped area (with pedestrian/cycle accessway). I consider that this is a sensible approach to take.

7. Conclusions

The Council seeks to rezone land on the south side of Pioneer Highway / eastern side of Te Wanaka Road from Race Training to Residential Zone. It is recommended that the noise provisions of the Residential Zone be referenced. This

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\(^1\) Letter from David Murphy to Ross l’Anson dated 9 April 2018

\(^2\) Undated letter from Ross l’Anson to David Murphy.
provides for the establishment of residential activity and protection of residential amenity during the transition stage.

Race training activities will struggle to comply with the more restrictive Residential Zone noise limits should they take place within the Residential Zone. Our preferred option is to rely on existing use rights for these activities to continue until residential development inevitably replaces them. The alternative is to exempt race training activities in this part of the Residential Zone and apply the Race Training Zone noise limits to them. This could perpetuate race training activities though when the clear intention is for residential activity in the new zone.

Consideration of reverse sensitivity impacts indicate that the change in zone provisions will not change the noise performance standards that apply to the race training activities taking place outside the new Residential Zone in the existing Race Training Zone, or how these apply. There is already residential development in the zone and there will be a risk that increasing the density of the residential development could result in complaints about the early morning race training activity. This is always a risk in rezoned land where the activities are in transition. The result of this might be the acceleration of the rezoning and further rationalisation of the horse training activity.
Ross l’Anson
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PALMERSTON NORTH 4442

Dear Ross

RESIDENTIAL DEVELOPMENT AT NAPIER ROAD AND TE-WANAKA ROAD / PIONEER HIGHWAY

Palmerston North City Council (Council) is currently working on rezoning land at Napier Road and Te-Wanaka Road / Pioneer Highway for residential development.

Updated growth projections identify a need for 4,600 new households in the city over the next 10 years. The Council is committed to proactively addressing residential land supply to meet its obligations under the National Policy Statement for Urban Development Capacity.

The land proposed for rezoning at Napier Road and Te-Wanaka Road / Pioneer Highway is identified on the attached maps.

As you will be aware the Napier Road site adjoins State Highway 3 and the Te-Wanaka Road / Pioneer Highway site adjoins State Highway 56.

While the Council is respectful of the need to take account of the effects of noise and additional connections to the state highways, the Council is also mindful of taking account of the likely future of the state highways in these locations.

The strategic work completed over the last decade on the Joint Transport Study and Regional Land Transport Plans, together with the more recent work on the Manawatu Gorge Replacement Project, the current state highway review and the pending business case on the Regional Freight Ring Road, all signal that it is unlikely that the affected portions of State Highway 3 and State Highway 56 will remain state highways in the medium term future. The more likely scenario is they will be local roads managed by the Council with lower speeds and different objectives to a state highway.

It is poor planning to design a future residential area in a manner to mitigate the effects of a state highway which is unlikely to remain in the medium term future. For example, a 40 metre noise setback is an inefficient use of land if it will not be required in the future. It may also make the Napier Road site undevelopable given the narrow depth of the site. Continuous acoustic fencing with housing turning its back on Napier Road and Pioneer Highway will not create a strong residential character. The Te-Wanaka Road site forms part of the larger City West area, so the design in this location will likely set the tone for the remainder of the City West area.
The urban form outcomes of the new residential development at Napier Road between Roberts Line and James Line is less than desirable with poor connectivity and no relationship between Napier Road and the new residential subdivision. These types of outcomes highlight the lack of integration between the RMA, LGA and LTMA, as sighted in recent publications such as the Productivity Commission's Better Urban Planning.

Council is currently completing technical assessments for the proposed zone changes at Napier Road and Te-Wanaka Road / Pioneer Highway, including noise and traffic assessments. Can you please confirm that for the purposes of these assessments NZTA are comfortable that the Council assumes that Napier Road (between Sutton Place and Roberts Line) and Pioneer Highway (between the Mangaone Bridge and Shirriffs Road) will be local roads managed by Council with lower speeds and different objectives to a state highway? It would be useful to have a discussion about what traffic volumes and speeds could be anticipated under the local road scenario.

Yours sincerely

David Murphy
CITY PLANNING MANAGER
Dear David

RESIDENTIAL DEVELOPMENT AT NAPIER ROAD AND TE-WANAKA ROAD/PIONEER HIGHWAY

Thank you for your letter dated 10 April 2018 regarding the rezoning land at Napier Road and Te-Wanaka Road/Pioneer Highway for residential development.

As you have stated in your letter, the region has been working together to develop the strategic transport network, to ensure it is aligned with the Joint Transportation Strategy, Regional Land Transport Plan, Accelerate25 and Accessing Central New Zealand.

The NZ Transport Agency is part of Central Government, and therefore has strong ties with the drive to releasing land for residential development, particularly for affordable housing.

The Transport Agency agrees that, for the purposes of the exercise you are currently undertaking for Napier Road and Te-Wanaka Road/Pioneer Highway, to having the reverse sensitivity assessed as being aligned with having high urban development with a view to ensuring the speed limit matches the environment, as discussed in your letter. By taking this approach, the development of the City will meet the outcomes of the transport network review.

While The Transport Agency is in agreement with your approach regarding the rezoning and development opportunities, we remind you that it is important to maintain some protection over the strategic, arterial, transport network. Ensuring there is suitable protection of the corridor will enable the efficient movement of traffic through the city and reduce the impact on urban streets.

If you would like to discuss this matter further with the New Zealand Transport Agency (NZTA) you are welcome to contact me, at ross.ianson@nzta.govt.nz or on (06) 953 6077.

Yours Sincerely

Ross I’Anson
Manager System Management