



**PAPAIOEA**  
**PALMERSTON**  
**NORTH**  
**CITY**

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# **PALMERSTON NORTH CITY COUNCIL**

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## **AGENDA**

# **FUTURE DEVELOPMENT STRATEGY JOINT STEERING GROUP**

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**9.00AM - DELIBERATIONS, MONDAY 20 MAY  
2024**

**COUNCIL CHAMBER, FIRST FLOOR  
CIVIC ADMINISTRATION BUILDING  
32 THE SQUARE, PALMERSTON NORTH**

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# MEMBERS

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**Grant Smith (Chair)**  
**Leonie Hapeta**  
**Lorna Johnson**  
**Rachel Keedwell**  
**Fiona Gordon**  
**Te Kenehi Teira**

AGENDA ITEMS, IF NOT ATTACHED, CAN BE VIEWED AT

[pncc.govt.nz](http://pncc.govt.nz) | Civic Administration Building, 32 The Square  
City Library | Ashhurst Community Library | Linton Library

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**Waid Crockett**

**Chief Executive | PALMERSTON NORTH CITY COUNCIL**

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Te Marae o Hine | 32 The Square  
Private Bag 11034 | Palmerston North 4442 | New Zealand  
[pncc.govt.nz](http://pncc.govt.nz)

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PALMERSTON  
NORTH  
CITY



# **FUTURE DEVELOPMENT STRATEGY JOINT STEERING GROUP MEETING**

20 May 2024

## **ORDER OF BUSINESS**

1. **Karakia Timatanga**
2. **Apologies**
3. **Late Submissions - Draft Palmerston North Future Development Strategy 2024** Page 5
4. **Confirmation of Minutes** Page 63  
"That the minutes of the Future Development Strategy Joint Steering Group meeting of 13 May 2024 Part I Public be confirmed as a true and correct record."
5. **Deliberations Report - Draft Palmerston North Future Development Strategy 2024** Page 71  
Memorandum, presented by Keegan Aplin-Thane, Senior Planner Palmerston North City Council and Leana Shirley, Senior Planner Horizons Regional Council.
6. **Karakia Whakamutunga**



## SUBMISSION FROM CONSULTATION

**TO:** Future Development Strategy Joint Steering Group

**MEETING DATE:** 20 May 2024

**TITLE:** Late Submissions - Draft Palmerston North Future Development Strategy 2024

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### RECOMMENDATIONS TO FUTURE DEVELOPMENT STRATEGY JOINT STEERING GROUP

1. That the Joint Steering Group note the late submissions.
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Late Submissions that were not previously circulated to the Joint Steering Group.

Submission Number	Name
139	Lorrene Langer
140	Gavin Cornford
141	Andrea Hurley
142	Dennis Yorke
143	Jenny Davies
144	Alex Davies
145	Zaneta Park and Mike Tate

### ATTACHMENTS

1. Submission 139 - 145 [↓](#) 

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

139



## Privacy

All submissions may be made publicly available on our website, customer service centre, and some of our libraries.

Your contact details (but not your name) are confidential and will not be published. Elected members receive all submissions without contact details so they can consider the views and comments expressed.

PNCC Rec'd - 9 MAY 2024

We may share your submission (but not your name or contact information) with Horizons Regional Council, government agencies and national utility providers to help us assess the information.

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The creation of the Future Development Strategy is a collaboration between Palmerston North City Council and Horizons Regional Council.

## CONTACT DETAILS

Name LORRENCE LANGEUR

Organisation (if applicable)

Postal address

Email **7(2)(a) Privacy**Phone / Please provide a daytime contact number **7(2)(a) Privacy**

## HEARING

The Council will hear submissions at the public meeting on **13 May 2024**

Do you want to speak to Council in support of your submission?

☐ Yes

☒ No



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM



## WELL-FUNCTIONING URBAN ENVIRONMENTS

Our draft strategy sets out our plans for creating and enhancing well-functioning urban environments.  
This can be found in Section C of the draft strategy.

1 Is there anything else you think should be part of our urban areas to make them well-functioning?

MORE CAR PARKING - TOO MUCH HAS BEEN LOST

## OPPORTUNITIES

We've identified opportunities that could provide for housing, business and industrial growth. For example, vacant space in business zone buildings could be used for housing. Or more efficient transport links between Wellington and Palmerston North could allow us to provide for some of Wellington's industrial growth here. **These opportunities can be found in section B of the draft Strategy.**

2 Do you know of any opportunities we've missed?

**PALMY**  
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PALMERSTON  
NORTH  
CITY

3 Do you think there are any constraints we've missed?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM



## OUR PROPOSED GROWTH PLAN

Our draft Future Development Strategy proposes a balanced approach to growing Palmy. This includes repurposing land and increasing density in some areas within the city, along with some greenfield expansion around the edges.

### GROWING IN

We're proposing 'growing in' (increasing density in some areas and repurposing land in the city) to provide for housing, business, and industrial growth. For example, rezoning to enable housing at Roxburgh Crescent and Huia Street Reserve (among others). **Where we're proposing to 'grow in' can be found in Section D of the draft strategy.**

4 Do you agree or disagree with the extent we've shown for 'growing in'?

☐ Agree

☐ Disagree

Please explain why:

5 Do you have any other thoughts about 'growing in'?

6 Are there any other 'growing in' opportunities you think we've missed?

### GROWING UP

We're proposing 'growing up' (increasing density and height - up to 3 storeys) within some of our existing residential zones to provide for housing, business and industrial growth. **Where we're proposing to 'grow up' can be found in Section D of the draft strategy.**

7 Do you agree or disagree with the extent we've shown for 'growing up'?

☐ Agree

☐ Disagree

Please explain why:

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM



8 Do you have any thoughts about 'growing up'?

WE NEED THE SUN SHINE IN THE HOME  
SO MAKE SURE EACH HOUSE GETS IT

9 Are there any areas we've missed to 'grow up'? If so, where?

## GROWING OUT

We're proposing 'growing out' through greenfield expansion (development of currently undeveloped land) to enable new housing at Aokautere (1,000 homes) and Kākātangiata on the western edge of the city (7,200 homes).

For industrial growth, we're proposing 'growing out' through greenfield expansion at Te Utanganui, to the northeast of the city along Railway Road (288 hectares).

Where we're proposing to 'grow out' can be found in Section D of the draft strategy.

10 Do you agree or disagree with the extent we've shown for 'growing out'?

☒ Agree

☐ Disagree

Please explain why:

11 Do you have any other thoughts about 'growing out'?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM



## ANYTHING ELSE?

12 What other information could be useful for considering the next 30 years of growth for the district?

13 Do you have any other comments you'd like to make on the future development of Palmerston North City and district?

COLOUR CODE ~~IN~~ BUS STOP SIGNS  
WE CAN'T SEE WHERE A STOP IS

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM



## TE UTANGANUI – CENTRAL NEW ZEALAND DISTRIBUTION HUB

We've set out a staged masterplan for greenfield growth around the airport, planned KiwiRail Regional Freight Hub, and proposed Regional Freight Ring Road. Te Utanganui aims to co-locate infrastructure for air, road, and rail freight to create a nationally competitive logistics hub. It is planned to roll out in three phases over the next 30 years and would require rezoning rural zone land to industrial zone, along with a set of transport and stormwater upgrades. **You can find more information in the masterplan.**

14 What are your thoughts on the opportunities or challenges that Te Utanganui presents for Bunnythorpe, the city, and the economy?

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15 What are the implications for your property in this masterplan?

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16 What additional local knowledge or other information are you aware of that could help us to refine our masterplan?

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17 What further information could we investigate or provide to better inform future stages?

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### WOULD YOU LIKE US TO KEEP YOU INFORMED FOR TE UTANGANUI IN THE FUTURE?

Please leave your email address and we will add you to our database.

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# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

140-1



## Privacy

All submissions may be made publicly available on our website, customer service centre, and some of our libraries.

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We may share your submission (but not your name or contact information) with Horizons Regional Council, government agencies and national utility providers to help us assess the information.

We collect your contact information so we can keep you up to date with the proposal. For more information, see our privacy statement [pncc.govt.nz/privacy](https://pncc.govt.nz/privacy)

7(2)(a)

The creation of the Future Development Strategy is a collaboration between Palmerston North City Council and Horizons Regional Council.

## CONTACT DETAILS

Name

Gavin Conford

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—

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Phone / Please provide a daytime contact number

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## HEARING

The Council will hear submissions at the public meeting on **13 May 2024**

Do you want to speak to Council in support of your submission?

☐ Yes

☒ No

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

140-2



## WELL-FUNCTIONING URBAN ENVIRONMENTS

Our draft strategy sets out our plans for creating and enhancing well-functioning urban environments. This can be found in **Section C** of the draft strategy.

1 Is there anything else you think should be part of our urban areas to make them well-functioning?

I'm not sure why Horizons needs influence (further) on the residents of PN, I don't believe it is for my benefit.

## OPPORTUNITIES

We've identified opportunities that could provide for housing, business and industrial growth. For example, vacant space in business zone buildings could be used for housing. Or more efficient transport links between Wellington and Palmerston North could allow us to provide for some of Wellington's industrial growth here. **These opportunities can be found in section B of the draft Strategy.**

2 Do you know of any opportunities we've missed?

Transport links to Wgtn benefit a few at too great a cost to many. If Wgtn industry wants to venture north, let them pay the way rather than subsidising their development here so they can make more \$\$.



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

140-3



## CONSTRAINTS

As part of our Future Development Strategy, we need to identify constraints to our district's growth. Affordability will always be one of the main challenges we face, as providing infrastructure to service growth comes with significant costs.

Other constraints we've considered are:

- |  |   |   |   |
|--|---|---|---|
| <ul style="list-style-type: none"> <li>➤ Stormwater ponding</li> <li>➤ Flood prone areas</li> <li>➤ Flood protection structures</li> </ul> | <ul style="list-style-type: none"> <li>➤ Liquefaction and faults</li> <li>➤ Erosion and unstable land</li> <li>➤ Productive rural land</li> </ul> | <ul style="list-style-type: none"> <li>➤ The state highway network</li> <li>➤ The railway network</li> <li>➤ The national power grid</li> </ul> | <ul style="list-style-type: none"> <li>➤ Local power and gas network</li> <li>➤ The telecommunications network</li> <li>➤ Airport noise and take-off zones</li> </ul> |
|--|---|---|---|

Discussion and a map of each of these constraints can be found in Appendix 1 of the draft strategy.

3 Do you think there are any constraints we've missed?

I think you are addressing too many issues already,  
always at the expense of Horizons (+ PNCC) Ratepayers.  
Just because you have a statutory right to increase  
rates, doesn't mean to say it is moral/welcome/  
asked for,  
Austerity needed.

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

140-4



## OUR PROPOSED GROWTH PLAN

Our draft Future Development Strategy proposes a balanced approach to growing Palmy. This includes repurposing land and increasing density in some areas within the city, along with some greenfield expansion around the edges.

### GROWING IN

We're proposing 'growing in' (increasing density in some areas and repurposing land in the city) to provide for housing, business, and industrial growth. For example, rezoning to enable housing at Roxburgh Crescent and Huia Street Reserve (among others).  
Where we're proposing to 'grow in' can be found in Section D of the draft strategy.

4 Do you agree or disagree with the extent we've shown for 'growing in'?

☐ Agree ☒ Disagree Please explain why:

Larger populations require greater infrastructure to be funded by the ratepayers, and current residents get pushed down the pecking order.

5 Do you have any other thoughts about 'growing in'?

↳ Bigger isn't necessarily better. Bigger does not mean cost efficient, nor affordable, nor even beneficial.

6 Are there any other 'growing in' opportunities you think we've missed?

↳ "Grow in" the idea you shouldn't keep putting up rates just because of some grandiose plans.

### GROWING UP

We're proposing 'growing up' (increasing density and height - up to 3 storeys) within some of our existing residential zones to provide for housing, business and industrial growth. Where we're proposing to 'grow up' can be found in Section D of the draft strategy.

7 Do you agree or disagree with the extent we've shown for 'growing up'?

☐ Agree ☒ Disagree Please explain why:

Will you welcome 3 storey housing next to your home? Already residents of Fitzherbert Ave & Park Road have expressed disapproval of "affordable" housing at that corner. Would you want it next door to you?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

140-5



ITEM 3 - ATTACHMENT 1

8 Do you have any thoughts about 'growing up'?

Grow up in ideas, not Rates

Grow up in Austerity.  
3-storeys good, if you'll have them as neighbours.

9 Are there any areas we've missed to 'grow up'? If so, where?



## GROWING OUT

We're proposing 'growing out' through greenfield expansion (development of currently undeveloped land) to enable new housing at Aokautere (1,000 homes) and Kākatangiata on the western edge of the city (7,200 homes).

For industrial growth, we're proposing 'growing out' through greenfield expansion at Te Utanganui, to the northeast of the city along Railway Road (288 hectares).

Where we're proposing to 'grow out' can be found in Section D of the draft strategy.

10 Do you agree or disagree with the extent we've shown for 'growing out'?

☐

Agree



Disagree

Please explain why:

Too expensive to develop at Ratepayer expense, unless it is fully paid for by developers and those who will make money from growing out.

11 Do you have any other thoughts about 'growing out'?

Growing bigger ain't necessarily better - ask Auckland. We have limited resources eg. water, and wastewater is already a prohibitively costly fanciful dream.

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

140-6



## ANYTHING ELSE?

12

What other information could be useful for considering the next 30 years of growth for the district?

Make the incoming population/industry pay fully  
for their assimilation into this area.

13

Do you have any other comments you'd like to make on the future development of Palmerston North City and district?

Auckland shows the folly of "bigger is better".  
Be thankful, & good custodians, of what we have already.



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

140-7



## TE UTANGANUI – CENTRAL NEW ZEALAND DISTRIBUTION HUB

We've set out a staged masterplan for greenfield growth around the airport, planned KiwiRail Regional Freight Hub, and proposed Regional Freight Ring Road. Te Utanganui aims to co-locate infrastructure for air, road, and rail freight to create a nationally competitive logistics hub. It is planned to roll out in three phases over the next 30 years and would require rezoning rural zone land to industrial zone, along with a set of transport and stormwater upgrades. **You can find more information in the masterplan.**

- 14 What are your thoughts on the opportunities or challenges that Te Utanganui presents for Bunnythorpe, the city, and the economy?

Massive costs to benefit a few. If NZ Rail pays for their Transport hub, it Trucking companies pay for the ring road ... go for it.

- 15 What are the implications for your property in this masterplan?

→ Prohibitive Rates increases to pay for somebody's grand idea.

- 16 What additional local knowledge or other information are you aware of that could help us to refine our masterplan?

S.H.1 through Sanson is already a by-pass. Existing Transport companies can make do with Tennison Ave.

- 17 What further information could we investigate or provide to better inform future stages?

Minimize the grand plan / great ideas.  
Maximize Austerity.

WOULD YOU LIKE US TO KEEP YOU INFORMED FOR TE UTANGANUI IN THE FUTURE?

Please leave your email address and we will add you to our database.

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

141-1



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## CONTACT DETAILS

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Phone / Please provide a daytime contact number

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## HEARING

The Council will hear submissions at the public meeting on **13 May 2024**

Do you want to speak to Council in support of your submission?

☐ Yes

☒ No



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

141-2



## WELL-FUNCTIONING URBAN ENVIRONMENTS

Our draft strategy sets out our plans for creating and enhancing well-functioning urban environments. This can be found in Section C of the draft strategy.

1 Is there anything else you think should be part of our urban areas to make them well-functioning?

## OPPORTUNITIES

We've identified opportunities that could provide for housing, business and industrial growth. For example, vacant space in business zone buildings could be used for housing. Or more efficient transport links between Wellington and Palmerston North could allow us to provide for some of Wellington's industrial growth here. **These opportunities can be found in section B of the draft Strategy.**

2 Do you know of any opportunities we've missed?

Pedestrian passage way between  
Trenaine Ave to Milson. \$

This would be somewhere between  
Rangitikei Ramp and Milson Ramp.

This would take away several vehicles  
trying to commute backwards and forwards  
getting children to school or themselves  
to work.





# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

141-4



## OUR PROPOSED GROWTH PLAN

Our draft Future Development Strategy proposes a balanced approach to growing Palmy. This includes repurposing land and increasing density in some areas within the city, along with some greenfield expansion around the edges.

### GROWING IN

We're proposing 'growing in' (increasing density in some areas and repurposing land in the city) to provide for housing, business, and industrial growth. For example, rezoning to enable housing at Roxburgh Crescent and Huia Street Reserve (among others).  
**Where we're proposing to 'grow in' can be found in Section D of the draft strategy.**

4 Do you agree or disagree with the extent we've shown for 'growing in'?

☐

Agree

☐

Disagree

Please explain why:

5 Do you have any other thoughts about 'growing in'?

6 Are there any other 'growing in' opportunities you think we've missed?

~~Passag~~ Passage way - ~~to~~ either sub way or over railway for pedestrian's scooters, prams and like.

### GROWING UP

We're proposing 'growing up' (increasing density and height - up to 3 storeys) within some of our existing residential zones to provide for housing, business and industrial growth. **Where we're proposing to 'grow up' can be found in Section D of the draft strategy.**

7 Do you agree or disagree with the extent we've shown for 'growing up'?

☐

Agree

☐

Disagree

Please explain why:

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

141-5



8 Do you have any thoughts about 'growing up'?

Take care of the sun windows  
needed on properties - helps with  
well being.

9 Are there any areas we've missed to 'grow up'? If so, where?

## GROWING OUT

We're proposing 'growing out' through greenfield expansion (development of currently undeveloped land) to enable new housing at Aokautere (1,000 homes) and Kākātangiata on the western edge of the city (7,200 homes).

For industrial growth, we're proposing 'growing out' through greenfield expansion at Te Utanganui, to the northeast of the city along Railway Road (288 hectares).

Where we're proposing to 'grow out' can be found in Section D of the draft strategy.

10 Do you agree or disagree with the extent we've shown for 'growing out'?

☐ Agree

☐ Disagree

Please explain why:

11 Do you have any other thoughts about 'growing out'?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

141-6



## ANYTHING ELSE?

12 What other information could be useful for considering the next 30 years of growth for the district?

Get people out of cars.  
Get freight on to rail.

13 Do you have any other comments you'd like to make on the future development of Palmerston North City and district?

\* Passage way from Milson to Town.  
(Trenkine Ave Area.)

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

141-7



## TE UTANGANUI - CENTRAL NEW ZEALAND DISTRIBUTION HUB

We've set out a staged masterplan for greenfield growth around the airport, planned KiwiRail Regional Freight Hub, and proposed Regional Freight Ring Road. Te Utanganui aims to co-locate infrastructure for air, road, and rail freight to create a nationally competitive logistics hub. It is planned to roll out in three phases over the next 30 years and would require rezoning rural zone land to industrial zone, along with a set of transport and stormwater upgrades. **You can find more information in the masterplan.**

14 What are your thoughts on the opportunities or challenges that Te Utanganui presents for Bunnythorpe, the city, and the economy?

What happens to the areas not suitable for industrail development - who buys theses ???

15 What are the implications for your property in this masterplan?

-Parents property has alot of waterways so \$ not suitable for buildings.

16 What additional local knowledge or other information are you aware of that could help us to refine our masterplan?

17 What further information could we investigate or provide to better inform future stages?

WOULD YOU LIKE US TO KEEP YOU INFORMED FOR TE UTANGANUI IN THE FUTURE?

Please leave your email address and we will add you to our database.

7(2)(a) Privacy



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142-1



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PNCC Rec'd - 9 MAY 2024

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## CONTACT DETAILS

Name

Dennis Yorke

Organisation (if applicable)

N/A.

Postal address

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Email

Phone / Please provide a daytime contact number

7(2)(a) Privacy

## HEARING

The Council will hear submissions at the public meeting on **13 May 2024**

Do you want to speak to Council in support of your submission?

☐ Yes

☒ No

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

142-2



## WELL-FUNCTIONING URBAN ENVIRONMENTS

Our draft strategy sets out our plans for creating and enhancing well-functioning urban environments.  
This can be found in **Section C** of the draft strategy.

1 Is there anything else you think should be part of our urban areas to make them well-functioning?

Stop overcrowding our living spaces.

Infill housing alone is ugly and an eyesore

It certainly does not enhance living

~~Ext~~ External growth is not the answer.

Quantity does not equate to quality!

## OPPORTUNITIES

We've identified opportunities that could provide for housing, business and industrial growth. For example, vacant space in business zone buildings could be used for housing. Or more efficient transport links between Wellington and Palmerston North could allow us to provide for some of Wellington's industrial growth here. **These opportunities can be found in section B of the draft Strategy.**

2 Do you know of any opportunities we've missed?

No, I have not read the draft strategy.



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

142-3



## CONSTRAINTS

As part of our Future Development Strategy, we need to identify constraints to our district's growth. Affordability will always be one of the main challenges we face, as providing infrastructure to service growth comes with significant costs.

Other constraints we've considered are:

- |  |   |   |   |
|--|---|---|---|
| <ul style="list-style-type: none"> <li>➤ Stormwater ponding</li> <li>➤ Flood prone areas</li> <li>➤ Flood protection structures</li> </ul> | <ul style="list-style-type: none"> <li>➤ Liquefaction and faults</li> <li>➤ Erosion and unstable land</li> <li>➤ Productive rural land</li> </ul> | <ul style="list-style-type: none"> <li>➤ The state highway network</li> <li>➤ The railway network</li> <li>➤ The national power grid</li> </ul> | <ul style="list-style-type: none"> <li>➤ Local power and gas network</li> <li>➤ The telecommunications network</li> <li>➤ Airport noise and take-off zones</li> </ul> |
|--|---|---|---|

Discussion and a map of each of these constraints can be found in Appendix 1 of the draft strategy.

3 Do you think there are any constraints we've missed?

*It appears to be reasonably comprehensive  
but it is all relevant.*

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

142-4



## OUR PROPOSED GROWTH PLAN

Our draft Future Development Strategy proposes a balanced approach to growing Palmy. This includes repurposing land and increasing density in some areas within the city, along with some greenfield expansion around the edges.

### GROWING IN

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Where we're proposing to 'grow in' can be found in Section D of the draft strategy.

4 Do you agree or disagree with the extent we've shown for 'growing in'?

☐

Agree

☒

Disagree

Please explain why:

It won't make life any better for anyone  
Only in the eyes of those who "dream up" such schemes

5 Do you have any other thoughts about 'growing in'?

Yes, do it do it!

6 Are there any other 'growing in' opportunities you think we've missed?

Yes, Rethink your thoughts.

The world is overcrowded, do we have to follow suit  
(No) of course not.

### GROWING UP

We're proposing 'growing up' (increasing density and height - up to 3 storeys) within some of our existing residential zones to provide for housing, business and industrial growth. Where we're proposing to 'grow up' can be found in Section D of the draft strategy.

7 Do you agree or disagree with the extent we've shown for 'growing up'?

☐

Agree

☒

Disagree

Please explain why:

As above it does not improve the quality of  
life.



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

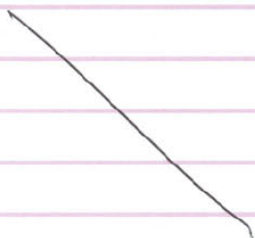
142-5



8 Do you have any thoughts about 'growing up'?

Yes, you are going in the wrong direction  
We don't and should not accommodate the rest  
of the world's population.

9 Are there any areas we've missed to 'grow up'? If so, where?



## GROWING OUT

We're proposing 'growing out' through greenfield expansion (development of currently undeveloped land) to enable new housing at Aokautere (1,000 homes) and Kākatangiata on the western edge of the city (7,200 homes).

For industrial growth, we're proposing 'growing out' through greenfield expansion at Te Utanganui, to the northeast of the city along Railway Road (288 hectares).

Where we're proposing to 'grow out' can be found in Section D of the draft strategy.

10 Do you agree or disagree with the extent we've shown for 'growing out'?

☐

Agree

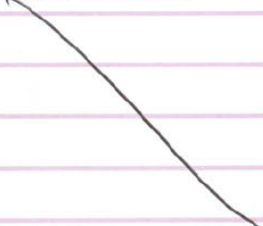
☒

Disagree

Please explain why:

This suggestion simply means eating up good productive  
farmland, which is so precious. That is crazy

11 Do you have any other thoughts about 'growing out'?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

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## ANYTHING ELSE?

12 What other information could be useful for considering the next 30 years of growth for the district?

Yes maintain and keep the city functioning properly - Not "pie in the sky nonsense."

A 30 year growth plan is indicated.

13 Do you have any other comments you'd like to make on the future development of Palmerston North City and district?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

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## TE UTANGANUI - CENTRAL NEW ZEALAND DISTRIBUTION HUB

We've set out a staged masterplan for greenfield growth around the airport, planned KiwiRail Regional Freight Hub, and proposed Regional Freight Ring Road. Te Utanganui aims to co-locate infrastructure for air, road, and rail freight to create a nationally competitive logistics hub. It is planned to roll out in three phases over the next 30 years and would require rezoning rural zone land to industrial zone, along with a set of transport and stormwater upgrades. **You can find more information in the masterplan.**

14

What are your thoughts on the opportunities or challenges that Te Utanganui presents for Bunnythorpe, the city, and the economy?

Think and move very carefully

15

What are the implications for your property in this masterplan?

I see no great gain in the above

16

What additional local knowledge or other information are you aware of that could help us to refine our masterplan?

17

What further information could we investigate or provide to better inform future stages?

Listen to what the public i.e. rate payers want. They are the people who pay, ultimately, for these proposed changes. It is for "them" to say, not city councillors, they simply represent the ratepayers' wishes.

**WOULD YOU LIKE US TO KEEP YOU INFORMED FOR TE UTANGANUI IN THE FUTURE?**

Please leave your email address and we will add you to our database.

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

143-1



## Privacy

All submissions may be made publicly available on our website, customer service centre, and some of our libraries.

Your contact details (but not your name) are confidential and will not be published. Elected members receive all submissions without contact details so they can consider the views and comments expressed.

PNCC Rec'd - 9 MAY 2024

We may share your submission (but not your name or contact information) with Horizons Regional Council, government agencies and national utility providers to help us assess the information.

We collect your contact information so we can keep you up to date with the proposal. For more information, see our privacy statement [pncc.govt.nz/privacy](https://pncc.govt.nz/privacy)

The creation of the Future Development Strategy is a collaboration between Palmerston North City Council and Horizons Regional Council.

## CONTACT DETAILS

Name

*Jenny Davies*

Organisation (if applicable)

Postal address

7(2)(a) Privacy

Email

7(2)(a) Privacy

Phone / Please provide a daytime contact number

7(2)(a) Privacy

## HEARING

The Council will hear submissions at the public meeting on **13 May 2024**

Do you want to speak to Council in support of your submission?

☒

Yes

☐

No



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

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## WELL-FUNCTIONING URBAN ENVIRONMENTS

Our draft strategy sets out our plans for creating and enhancing well-functioning urban environments. This can be found in Section C of the draft strategy.

1 Is there anything else you think should be part of our urban areas to make them well-functioning?

The ratepayers of PNCC can afford to pay only the rates as stated there is real concern/fear amongst communities about this extra payment  
Our elected representatives must make the decisions not the staff of the PNCC  
The LTP books and booklets suggest propaganda to convince us all the ideas on page 9 are vitally necessary when as already stated they can wait  
We all need to "live" in PN and sports and the few tourists will come to play sports and enjoy what we have as a city without any "frills"  
Nature and the environment will also flourish with less pollution in our "awa"

## OPPORTUNITIES

We've identified opportunities that could provide for housing, business and industrial growth. For example, vacant space in business zone buildings could be used for housing. Or more efficient transport links between Wellington and Palmerston North could allow us to provide for some of Wellington's industrial growth here. **These opportunities can be found in section B of the draft Strategy.**

2 Do you know of any opportunities we've missed?

yes: two trains (capital connection) a day.  
We will benefit from more residents coming to live here in P.N. better facilities, education and business opportunities and maybe seismic safer — but need 2 trains (both ways) per day for "echo travelling" whereas A#1 is often (yesterday) blocked. — It really is a "horror" road to use for hospital appointments, business, pleasure, sport etc and before our airport is expanded — no flights PNR → WLG. !!!!

3 Do you think there are any constraints we've missed?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

143-4



## OUR PROPOSED GROWTH PLAN

Our draft Future Development Strategy proposes a balanced approach to growing Palmy. This includes repurposing land and increasing density in some areas within the city, along with some greenfield expansion around the edges.

### GROWING IN

We're proposing 'growing in' (increasing density in some areas and repurposing land in the city) to provide for housing, business, and industrial growth. For example, rezoning to enable housing at Roxburgh Crescent and Huia Street Reserve (among others).  
**Where we're proposing to 'grow in' can be found in Section D of the draft strategy.**

4 Do you agree or disagree with the extent we've shown for 'growing in'?

☐ Agree ☒ Disagree Please explain why:

*Huia St is no place for high density housing.*

5 Do you have any other thoughts about 'growing in'?

6 Are there any other 'growing in' opportunities you think we've missed?

### GROWING UP

We're proposing 'growing up' (increasing density and height - up to 3 storeys) within some of our existing residential zones to provide for housing, business and industrial growth. **Where we're proposing to 'grow up' can be found in Section D of the draft strategy.**

7 Do you agree or disagree with the extent we've shown for 'growing up'?

☐ Agree ☒ Disagree Please explain why:

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

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8 Do you have any thoughts about 'growing up'?

Multi density housing leave this to the Govt to redevelop areas they have demolished and turned so many onto our "Homeless" and put the pressure onto central Govt to redevelop these areas of our city as soon as possible However, I doubt the Govt will begin to realise they too have a responsibility

Other areas where large empty sections have become available encourage "echo builds" to maintain our image of sustainability A new build (private) exist on Albert st and it is of serious concern of the competence of planners to allow such development Two units two storey no yard (although there is a park across an extremely busy and noisy street) The design has no sun/energy generation It is a failure of any concept of multidensity housing allowed by the planners of PNCC In all new house builds capturing the sun for internal house heating is a vital "echo" feature to be insisted on by planners and designers The cost saving is immense Solar is of course extra but worthy addition to new builds especially in a large development area as a collective arrangement for buying or selling extra energy generated can be done Some Marae are already doing this

## GROWING OUT

We're proposing 'growing out' through greenfield expansion (development of currently undeveloped land) to enable new housing at Aokautere (1,000 homes) and Kākātangiata on the western edge of the city (7,200 homes).

For industrial growth, we're proposing 'growing out' through greenfield expansion at Te Utanganui, to the northeast of the city along Railway Road (288 hectares).

Where we're proposing to 'grow out' can be found in Section D of the draft strategy.

10 Do you agree or disagree with the extent we've shown for 'growing out'?

☐

Agree

☒

Disagree

Please explain why:

11 Do you have any other thoughts about 'growing out'?

Growing our city Not onto valuable arable farmland for new housing or commercial development Should the new railway hub go ahead then keep commercial development to that area of the city Good roading network exists and with a rail head and siding warehouses for the meantime A good rail head is vital for the North Is should Wellington suffer from a disaster and there is the airport too which is functional and close to the city



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

143-6



## ANYTHING ELSE?

12 What other information could be useful for considering the next 30 years of growth for the district?

13 Do you have any other comments you'd like to make on the future development of Palmerston North City and district?

Rates over the next 10 years

Get rid of the "frills" page 9 "Greenbooklet" ideas through the PPNP book  
 Get out our city debt down by simply maintaining services with some seismic strengthening  
 Cut staff at PNCC to the "basics" maintain the living wage "for all though  
 Be less generous to sponsoring events encourage these for the business community  
 but adopt a more expensive "user pays" for all  
 Cut the catering costs for all meetings councillors meetings again some are definitely not  
 necessary  
 Parking fees on all streets like Church st and Broadway enroute to the fire station should be tagged  
 with a parking voucher of \$5 a day bought from PNCC and not managed by Wilsons for off shore  
 profit as these commuters work in our city and pay no rates  
 And there are many other streets around the inner city stuffed with commuter cars from north south  
 east and west They need to pay for parking  
 It works in other cities and WHY should they park free each day  
 Rates remission for churches and other places of interest This should be "open book"  
 Who gets this remission and why  
 Also the "development fee" made by developers or new builds when plans are approved should be  
 an "open book" to maintain the accuracy and integrity of such fees being paid

The real living costs for our all citizen's of our city have become huge electricity, cost of food for  
 all, loss of jobs, course deletion by our university so, fewer students these are real and fearful for  
 many We do not want a BANKRUPT CITY" Our rates need to be modest and practical for all  
 and think of nature that has no voice Cherish the world we have inherited for the betterment of  
 life for all the citizens of our city

Thank you

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

143-7



## TE UTANGANUI - CENTRAL NEW ZEALAND DISTRIBUTION HUB

We've set out a staged masterplan for greenfield growth around the airport, planned KiwiRail Regional Freight Hub, and proposed Regional Freight Ring Road. Te Utanganui aims to co-locate infrastructure for air, road, and rail freight to create a nationally competitive logistics hub. It is planned to roll out in three phases over the next 30 years and would require rezoning rural zone land to industrial zone, along with a set of transport and stormwater upgrades. **You can find more information in the masterplan.**

- 14 What are your thoughts on the opportunities or challenges that Te Utanganui presents for Bunnythorpe, the city, and the economy?

*Will affect land and property owners - sadly but, a 'rail Hub' is vital - the PN is already a distribution centre so, add rail.*

- 15 What are the implications for your property in this masterplan?

- 16 What additional local knowledge or other information are you aware of that could help us to refine our masterplan?

- 17 What further information could we investigate or provide to better inform future stages?

### WOULD YOU LIKE US TO KEEP YOU INFORMED FOR TE UTANGANUI IN THE FUTURE?

Please leave your email address and we will add you to our database.



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

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## Privacy

All submissions may be made publicly available on our website, customer service centre, and some of our libraries.

Your contact details (but not your name) are confidential and will not be published. Elected members receive all submissions without contact details so they can consider the views and comments expressed.

We may share your submission (but not your name or contact information) with Horizons Regional Council, government agencies and national utility providers to help us assess the information.

We collect your contact information so we can keep you up to date with the proposal. For more information, see our privacy statement [pncc.govt.nz/privacy](https://pncc.govt.nz/privacy)

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## CONTACT DETAILS

Name

*Mex Davies*

Organisation (if applicable)

Postal address

7(2)(a) Privacy

Email

7(2)(a) Privacy

Phone / Please provide a daytime contact number

7(2)(a) Privacy

## HEARING

The Council will hear submissions at the public meeting on **13 May 2024**

Do you want to speak to Council in support of your submission?

☐ Yes

☒ No

# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM



## WELL-FUNCTIONING URBAN ENVIRONMENTS

Our draft strategy sets out our plans for creating and enhancing well-functioning urban environments. This can be found in **Section C of the draft strategy**.

1 Is there anything else you think should be part of our urban areas to make them well-functioning?

## OPPORTUNITIES

We've identified opportunities that could provide for housing, business and industrial growth. For example, vacant space in business zone buildings could be used for housing. Or more efficient transport links between Wellington and Palmerston North could allow us to provide for some of Wellington's industrial growth here. **These opportunities can be found in section B of the draft Strategy.**

2 Do you know of any opportunities we've missed?





# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

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## OUR PROPOSED GROWTH PLAN

Our draft Future Development Strategy proposes a balanced approach to growing Palmy. This includes repurposing land and increasing density in some areas within the city, along with some greenfield expansion around the edges.

### GROWING IN

We're proposing 'growing in' (increasing density in some areas and repurposing land in the city) to provide for housing, business, and industrial growth. For example, rezoning to enable housing at Roxburgh Crescent and Huia Street Reserve (among others). **Where we're proposing to 'grow in' can be found in Section D of the draft strategy.**

4 Do you agree or disagree with the extent we've shown for 'growing in'?

☐

Agree

☒

Disagree

Please explain why:

*Huia St reserve is no place for housing.  
Any such green space is too precious to forgo.*

5 Do you have any other thoughts about 'growing in'?

6 Are there any other 'growing in' opportunities you think we've missed?

### GROWING UP

We're proposing 'growing up' (increasing density and height - up to 3 storeys) within some of our existing residential zones to provide for housing, business and industrial growth. **Where we're proposing to 'grow up' can be found in Section D of the draft strategy.**

7 Do you agree or disagree with the extent we've shown for 'growing up'?

☒

Agree

☐

Disagree

Please explain why:

*However, such zones must be part of the public transport system.*



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM



8 Do you have any thoughts about 'growing up'?

*Must be associated with green areas.  
See comment about Huia St reserve.  
Such housing in cities like Copenhagen is always  
associated with adjacent green open space.*

9 Are there any areas we've missed to 'grow up'? If so, where?

## GROWING OUT

We're proposing 'growing out' through greenfield expansion (development of currently undeveloped land) to enable new housing at Aokautere (1,000 homes) and Kākātangiata on the western edge of the city (7,200 homes).

For industrial growth, we're proposing 'growing out' through greenfield expansion at Te Utanganui, to the northeast of the city along Railway Road (288 hectares).

Where we're proposing to 'grow out' can be found in Section D of the draft strategy.

10 Do you agree or disagree with the extent we've shown for 'growing out'?



Agree



Disagree

Please explain why:

11 Do you have any other thoughts about 'growing out'?

**FUTURE  
DEVELOPMENT STRATEGY  
SUBMISSION FORM**

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ANYTHING ELSE?	
12	What other information could be useful for considering the next 30 years of growth for the district?
13	Do you have any other comments you'd like to make on the future development of Palmerston North City and district?



# FUTURE DEVELOPMENT STRATEGY SUBMISSION FORM

144-7



## TE UTANGANUI – CENTRAL NEW ZEALAND DISTRIBUTION HUB

We've set out a staged masterplan for greenfield growth around the airport, planned KiwiRail Regional Freight Hub, and proposed Regional Freight Ring Road. Te Utanganui aims to co-locate infrastructure for air, road, and rail freight to create a nationally competitive logistics hub. It is planned to roll out in three phases over the next 30 years and would require rezoning rural zone land to industrial zone, along with a set of transport and stormwater upgrades. **You can find more information in the masterplan.**

14 What are your thoughts on the opportunities or challenges that Te Utanganui presents for Bunnythorpe, the city, and the economy?

15 What are the implications for your property in this masterplan?

16 What additional local knowledge or other information are you aware of that could help us to refine our masterplan?

17 What further information could we investigate or provide to better inform future stages?

### WOULD YOU LIKE US TO KEEP YOU INFORMED FOR TE UTANGANUI IN THE FUTURE?

Please leave your email address and we will add you to our database.

145-1

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**From:** Keegan Aplin-Thane  
**Sent:** Thursday, 9 May 2024 7:06 pm  
**To:** Zaneta Park; Plan Change; Submission  
**Subject:** RE: Future Development Strategy plans - submission  
**Attachments:** Long term plan submission - May 2024, Zaneta Park and Mike Tate.docx

Thanks for submitting Zaneta and Mike,

I have sent this to the @Submission email address so that our Governance Team can consider accepting it as a late submission.

Cheers,

Keegan

---

**From:** Zaneta Park 7(2)(a) Privacy  
**Sent:** Thursday, May 9, 2024 3:28 PM  
**To:** Plan Change <planchange@pncc.govt.nz>; Keegan Aplin-Thane <Keegan.Aplin-Thane@pncc.govt.nz>  
**Subject:** Future Development Strategy plans - submission  
**Importance:** High

Kia ora Keegan and the Future Development Strategy Planning team,

I'm writing as we have submitted our submission for the PNCC 2024-2034 long-term plan. In doing so, we have just realised that there was a separate submission process for the Future Development Strategy, which much of our long-term plan submission focuses on! We had not realised this and can see that submissions for the Future Development Strategy closed on May 5th.

**Would it be possible to please make a late submission for the Future Development Strategy?** Our sincere apologies for the lateness, we did not realise that there were two different submission processes happening simultaneously. This is despite attending and having had several good conversations with council staff at the Bunnythorpe Community Session about the proposed rezoning changes in the Te Utanganui Master plan.

We are directly impacted by the proposed rezoning changes: our immediate neighbour's land is proposed to be rezoned as part of Industrial Area C. We have many concerns about this, including traffic safety ones, as outlined in the attached document.

**If it is possible to accept this submission (which is the same as which we have submitted for the PNCC long-term plan), we would be very grateful! 😊**

If not possible to accept our submission, could we please suggest that the Future Development Strategy team check all submissions to the PNCC 2024-2034 long-term plan for information which relates to the Te Utanganui Master plan? From talking with our neighbours, it seems that we are not the only ones who did not realise that there were two different submission processes! And so there may quite likely be other relevant submissions submitted to PNCC through the Long-term plan consultation process.



145-2

We do not need to speak to our submission, though we note that we have covered many points in our submission. We are happy to speak to any of these, or to clarify via email, if this would be helpful.

Many thanks for your help,

Zaneta Park and Mike Tate

7(2)(a) Privacy

*Submission from Zaneta Park and Mike Tate,*

## 7(2)(a) Privacy

*Neighbours to Industrial Area C in the proposed Te Utanganui Master plan.*

### Our submission is in three sections:

#### Contents

<b>SECTION 1: We do not agree with the rezoning of rural residential land to Industrial in Area C of the proposed Te Utanganui Master Plan.</b>	<b>2</b>
1. Industrial Area C would be an unwelcome neighbour to Palmy's Country park, the popular Linklater reserve.	2
2. Creation of traffic safety issues.	2
3. Detrimental impact on wildlife and waterways.	4
4. Destruction of a significant overwintering site for Monarch butterflies.	6
5. Likely heavier traffic and associated safety, noise and air quality issues for Kelvin Grove residents.	6
6. Loss of highly desirable and highly productive rural-residential land.	6
7. High roading costs for ratepayers and/or taxpayers	7
8. High development costs for ratepayers.	8
9. Creation of traffic issues in existing industrial area.	9
10. Constraints to future growth.	9
<b>SECTION 2: Other considerations regarding rezoning land to Industrial in the proposed Te Utanganui Master Plan.</b>	<b>10</b>
1. Fragmentation of proposed Industrial areas.	10
2. Recommend further investigating the extension of Industrial Area B westward.	10
3. We recommend proceeding with rezoning the proposed Industrial Area D zone BEFORE the proposed Industrial Area C. And that alternative locations are investigated for Industrial Area C.	11
<b>SECTION 3: Other comments.</b>	<b>11</b>
1. Increased pedestrian access to Linklater reserve.	11
2. Roberts Line Cycle paths request.	12



## 145-4

## SECTION 1: We do not agree with the rezoning of rural residential land to Industrial in Area C of the proposed Te Utanganui Master Plan.

This is for several reasons:

### 1. Industrial Area C would be an unwelcome neighbour to Palmy's Country park, the popular Linklater reserve.

- We note that the very popular **Linklater reserve**, including the **Roberts Line carpark**, is **not shown on the Te Utanganui master plan**. Linklater reserve is **Palmy's country park** with a strong rural theme.
- The proposal for **Industrial Area C to immediately neighbour this country park** seems at odds with the council's own mantra. Visitors to the park are expecting a rural experience and this will not be the case if neighbouring the park is a large industrial zone spoiling the current rural landscape, and with associated noise and intensified traffic. Please see Figure 1 below.
- This description of Linklater reserve as a Country Park is taken from the city council's own website, please see: <https://www.pncc.govt.nz/Parks-recreation/Parks-and-reserves/Linklater-Reserve> (under the 'History of Linklater reserve' section). The signage of Linklater reserve also clearly indicates that it is a Country Park, please see Figure 2 below.
- Again, we are very surprised that Linklater reserve is not even shown on the Te Utanganui Master plan and we strongly recommend that Industrial Area C does not go ahead.
- If the Industrial Area C does go ahead, it will be very important to have a bund of native trees around it, so that the rural landscape is not spoiled for visitors to Linklater reserve and for other residents in the area who have chosen to live there because of the existing rural character.

### 2. Creation of traffic safety issues.

- Linklater reserve is a very popular country park, with both carpark often full during weekends, public holidays and school holidays.
- The **Roberts Line carpark is very close to proposed Industrial Area C**, with cars often entering and exiting the carpark throughout the day. *The Roberts Lines carpark is located between Kelvin Grove road and Railway road, please see Figure 3.*

- If Industrial Area C was to go ahead, it would likely **increase heavy traffic** past the Roberts Line carpark which would **create a safety issue**. We do not like to think of the consequences of a truck hitting a family in a vehicle entering or exiting the carpark.
- It is imperative that should Industrial Area C go ahead, that safety mechanisms are incorporated so that heavy traffic does NOT increase along this stretch of road past the Linklater Reserve Roberts Line carpark.

Figure 1: Section of proposed Te Utanganui Master Plan, showing Linklater Reserve, Palmy's Country Park, and associated carparks.

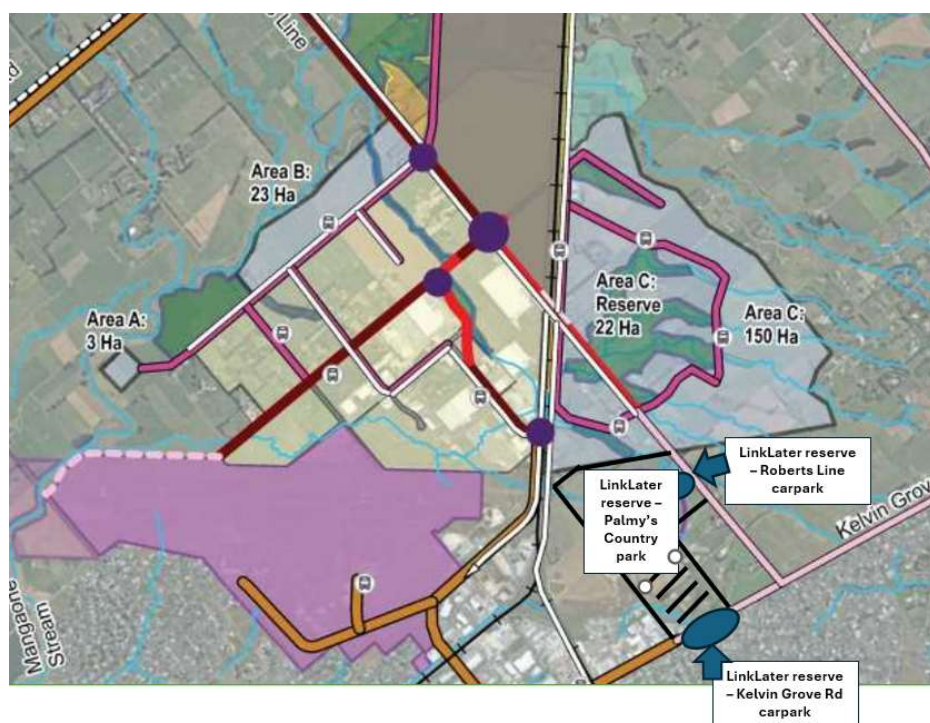




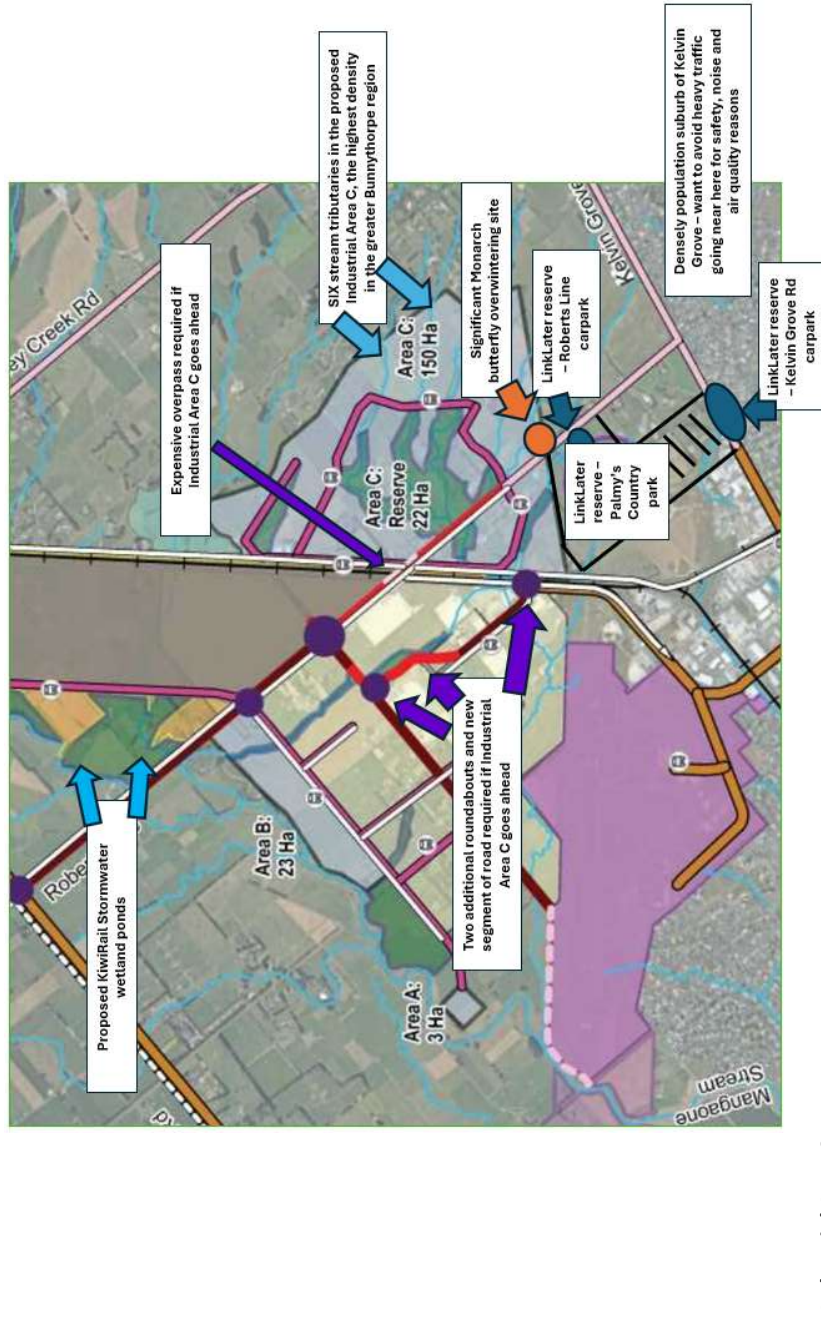
Figure 2. PNCC Signage at Linklater Reserve, clearly indicating it is a Country Park.



### 3. Detrimental impact on wildlife and waterways.

- The proposed Industrial Area C contains **SIX stream tributaries**, one of the **highest densities of tributaries** in the wider Bunnythorpe region. Please see Figure 3.
- The proposed Industrial area will be detrimental to the wide range of wildlife supported by these tributaries. This includes adversely impacting tuna (eels), frogs, skinks, Monarch butterflies, bees, and many species of birds including native birds like pūkeko, tui, pīwakawaka (fantails) and pūtakitaki (paradise ducks).
- The presence of frogs in these tributaries provides evidence that the quality of the water in the tributaries and associated ecosystems is high currently. Please see the "Threats" section of: <https://www.doc.govt.nz/nature/native-animals/reptiles-and-frogs/frogs-pepeketua/>

Figure 3: Section of Te Utanganui Master Plan, showing Linklater Reserve, Palmy's Country Park, and other key features relating to



Industrial Area C.



#### 4. Destruction of a significant overwintering site for Monarch butterflies.

- The **global population of Monarch butterflies has declined by 80%** in recent years and experts fear the figures could be similar across Aotearoa New Zealand.
- **Monarch butterflies abound** along the section of Roberts Line North between Kelvin Grove road and Railway road. Please see Figure 3.
- This includes a **significant overwintering site** which is located within the proposed Industrial Area C.
- We have personally visited this overwintering site, and know of no other location in Palmerston North, or indeed Aotearoa New Zealand, where there are so many **hundreds of Monarch butterflies** in a single location.

#### 5. Likely heavier traffic and associated safety, noise and air quality issues for Kelvin Grove residents.

- As above, if Industrial Area C goes ahead, heavy traffic would likely increase along Roberts Line, towards the densely populated large suburb of Kelvin Grove. Please see Figure 3.
- This will create traffic safety, noise and air quality issues for many residents.
- Users of Kelvin Grove road will also be impacted and an increase in heavy traffic down Roberts Line would cause a traffic safety issue at the intersection of Roberts Line and Kelvin Grove road.
- **It is imperative that should Industrial Area C go ahead, that mechanisms are incorporated so that heavy traffic is directed towards the Regional Freight Ring road. This is so that heavy traffic does NOT increase along Roberts Line towards the densely populated suburb of Kelvin Grove.**

#### 6. Loss of highly desirable and highly productive rural-residential land.

- Currently, Industrial Area C is zoned as rural-residential land.
- **The land is highly desirable**, as has the landscape, ecological and productivity advantages of rural land whilst being less than 5 minutes from the closest supermarket and only ten minutes away from the city.

- As mentioned above, the land is also **close to the very popular Linklater reserve**, which is another advantage to living in this area.
- **Many new high-quality houses have been built in the area** in recent years, whilst retaining the rural atmosphere of the location. This includes **several new houses along Roberts Line in the proposed Industrial Area C**.
- High-quality houses have also been built on nearby Tula line and Orakei Road, and in other locations in the nearby Tutaki road vicinity.
- Rezoning such **desirable, close-to-the-city rural/residential land** into Industrial land does not seem sensible. It is amazing living in a rural location that is so close to the city!
- Additionally, much of the land in the proposed Industrial Area C is **highly productive and currently used for agricultural and horticultural purposes**. For example, one of our neighbours has planted more than 300 fruit and nut trees in recent years.
- **Instead of changing the zoning of this land to Industrial Area C, we would recommend that the council retains the rural-residential zoning and recognizes the taonga that the city has in this area.**

## 7. High roading costs for ratepayers and/or taxpayers

- Locating Industrial Area C to the East of the main Railway line will require an **overpass** (or underpass) to be built across the railway line which will incur **high costs** for ratepayers and/or taxpayers.
- Industrial Area C also requires a **new segment of road** to be built between El Prado Drive and Richardsons Drive, which will incur further costs.
- The **new segment of road is only required because of the overpass**. The overpass means that the future main traffic route along Railway Road and west down Roberts Line North (part of the KiwiRail hub proposal) would no longer be possible.
- These **costs would not be required** should Industrial Area C be **relocated to west of the Railway line**.
- Ensuring that rates are affordable for residents is a key concern of many councils. Relocating Industrial Area C to the west of the railway line would seem to be an **easy way to reduce future rates for Palmerston North residents**.



## 8. High development costs for ratepayers.

- Unlike much of the land in the greater Bunnythorpe region which is flat in many places, the land in the proposed Industrial Area C is **rolling in many areas**. Please see Figure 4.
- This means that development costs to drain and level this land would be astronomical. Costs would be **considerably higher** than many other locations, so **increasing future rates for residents**.
- As above, relocating Industrial Area C to the west of the railway line would seem to be an **easy way to reduce future rates for Palmerston North residents**.

**Figure 4. Rolling land in the proposed Industrial Area C. There are many stream tributaries in this area.**



## 9. Creation of traffic issues in existing industrial area.

- The new segment of road between El Prado Road and Richardsons Line means that **all traffic will pass directly through the existing industrial area** along El Prado road, instead of going around it as is currently the case.
- Introducing high traffic volumes to this existing industrial area will **cause issues for industry-related traffic** when entering and exiting industrial locations.
- The new segment of road also means that **two additional roundabouts** will need to be traversed by **all vehicles** travelling through this area. This is compared to the traffic simply continuing straight along Railway road and then veering west at Roberts Line North, as proposed in the KiwiRail hub plans after the closure of the Northern end of Railway road.
- The additional roundabouts will **slow traffic** in the area, **make traversing the existing industrial area more difficult for heavy vehicles**, and **create congestion**.

## 10. Constraints to future growth.

- As **Industrial Area C is surrounded by several residential areas**, including the Tutaki Road region, East Bunnythorpe, and the densely populated suburb of Kelvin Grove, this means that Industrial Area C cannot be extended in the future without impacting on a large number of families.
- In contrast, if the Industrial zones are kept to the west of the railway line, as has always been indicated in all previous council (both city and regional) plans, this issue is much easier to avoid.

## 145-12

## SECTION 2: Other considerations regarding rezoning land to Industrial in the proposed Te Utanganui Master Plan.

### 1. Fragmentation of proposed Industrial areas.

- We were surprised to see that the proposed Industrial areas A, B, C, D and E in the current Te Utanganui Master plan are in fragmented locations, on both sides of the railway line and several kilometres apart.
- This distance loses the logistical advantage of a tight industry nucleus, so creating additional industry costs.
- **We would highly recommend that the Industrial zones are kept to the west of the railway line, and that they are as cohesive as possible.**

### 2. Recommend further investigating the extension of Industrial Area B westward.

- We understand that the main reason for the industrial zone not extending west of Industrial Area B is the flooding occurs in this area.
- However, we note that the nearly proposed KiwiRail hub includes the provision of two large Stormwater catchment ponds. Can these not be designed and/or extended in a manner to resolve any drainage issues?
- Extending the Industrial Area B westward would seem be a logical progression. It would maintain a tight nucleus for the industrial hub which has many logistical advantages for the industries in this area. And simultaneously would resolve many of the issues that rezoning Industrial Area C creates.
- **We recommend further liaison and investigations with KiwiRail to determine whether the Stormwater catchment ponds' design can be modified to resolve any drainage issues west of proposed Industrial Area B.**



## 145-13

3. We recommend proceeding with rezoning the proposed Industrial Area D zone BEFORE the proposed Industrial Area C. And that alternative locations are investigated for Industrial Area C.
  - We recommend proceeding with rezoning Industrial Area D BEFORE Industrial Area C because the cost is considerably lower both in terms of roading costs (no overpass or new stretch of road required) and development costs (it is much flatter topographically).
  - Industrial Area D is also closer to the main Freight Road and doesn't have many of the issues that rezoning Industrial Area C creates (please see Section 1).
  - **We would also highly recommend consulting with land owners in the broader Industrial Area D to determine if any owners are keen to have their land rezoned to industrial.** As it seems to us that the zone could be on any of the four corners of the Newbury Line/Roberts Line intersection, and there may be some land owners that would be keen to sell their land over the next decade.
  - It would be ideal if a solution could be designed that worked well for as many people in the community as possible.
  - As in Section 1, we disagree with the rezoning of land in the proposed Industrial Area C and recommend that the council does not proceed and investigates further options instead.
  - An ideal alternative to Industrial Area C would be **land west of the Railway line**, land which is **more suitable topographically for industry** and which is **more accessible to the planned Regional Freight ring road**. This would result in a **more cohesive industrial area** in the future.

## SECTION 3: Other comments.

1. Increased pedestrian access to Linklater reserve.
  - As immediate neighbours to Linklater reserve, we have seen the popularity of this reserve continue to grow each year.
  - The two carparks for Linklater reserve (Kelvin Grove road and Roberts Line) are often full, especially on weekends, public holidays and school holidays. There is a constant flow of visitors to the reserve throughout the day at these times.
  - It would be excellent if a footpath could be installed from Kelvin Grove road to the Roberts Line entrance, so that visitors could have the option to walk to this end of

the park. Visitors with big dogs often prefer this part of the reserve as there is more space for their dogs to run around.

## 2. Roberts Line Cycle paths request.

- The section of Roberts Line from Kelvin Grove road to Railway road is a popular route for recreational cyclists, especially on the weekends and holidays.
- However, because this section of road has no shoulder, no cycle path and contains several blind dips, it is not safe for cyclists.
- It would be excellent if a cycle path could be installed along this section of road, linking in with the Feilding to Palmerston North cycleway, and also allowing cyclists to stop at Linklater Reserve.





## PALMERSTON NORTH CITY COUNCIL

### Minutes of the Future Development Strategy Joint Steering Group Meeting Part I Public, held in the Council Chamber, First Floor, Civic Administration Building, 32 The Square, Palmerston North on 13 May 2024, commencing at 9.02am

**Members Present:** The Mayor (Grant Smith )(in the Chair), Councillors Leonie Hapeta, Lorna Johnson, Rachel Keedwell, Fiona Gordon and Te Kenehi Teira.

#### Karakia Timatanga

Te Kenehi Teira opened the meeting with karakia.

#### 1-24 Agree Palmerston North City Council Standing Orders Part 2: Meeting Procedures

Moved Grant Smith, seconded Te Kenehi Teira.

##### The **COMMITTEE RESOLVED**

1. That the Steering Group agree to conduct business for all meetings using the Part 2 of the Palmerston North City Council Standing Orders.

Clause 1-24 above was carried 6 votes to 0, the voting being as follows:

##### **For:**

Councillors Grant Smith, Leonie Hapeta, Lorna Johnson, Rachel Keedwell, Fiona Gordon and Te Kenehi Teira.

#### 2-24 Summary of Submissions - Draft Palmerston North Future Development Strategy 2024

Memorandum, presented by Keegan Aplin-Thane, Senior Planner, Palmerston North City Council and Leana Shirley, Senior Planner, Horizons Regional Council.

Moved Grant Smith, seconded Leonie Hapeta.

##### The **COMMITTEE RESOLVED**

1. That the Steering Group receive the summary of submissions on the Draft Palmerston North Future Development Strategy 2024.

Clause 2-24 above was carried 6 votes to 0, the voting being as follows:

**For:**

Councillors Grant Smith, Leonie Hapeta, Lorna Johnson, Rachel Keedwell, Fiona Gordon and Te Kenehi Teira.

**3-24**

**Hearing of Submissions - Draft Palmerston North Future Development Strategy 2024**

Moved Grant Smith, seconded Lorna Johnson.

The **COMMITTEE RESOLVED**

1. That the Steering Group hear submissions from presenters who indicated their wish to be heard in support of their submission.
2. That the Steering Group note the Procedure for Hearing of Submissions, as described in the procedure sheet.

Clause 3-24 above was carried 6 votes to 0, the voting being as follows:

**For:**

Councillors Grant Smith, Leonie Hapeta, Lorna Johnson, Rachel Keedwell, Fiona Gordon and Te Kenehi Teira.

The following persons appeared before the Committee to make oral statements in support of their submissions and replied to questions from Steering Group members.

**Chris Teo-Sherrell (105)**

Chris Teo-Sherrell spoke to his submission and made no additional comments.

**Mandy Shaw (128)**

Mandy Shaw spoke to her submission and made no additional comments.

**LT Projects Limited (Mike Taylor, Director, LT Projects Limited, Chris Lowe, Director, LT Projects Limited, Cam Twigley, Principal Planner, BTW Company, and Darrell Martin, Senior Planner, BTW Company) (83)**

Mike, Chris, Cam and Darrell spoke to the submission and made no additional comments.

**2<sup>nd</sup> Chapter Partners (Liam Dickson, Director 2<sup>nd</sup> Chapter Partners and Richard Coles, Director, Momentum Planning and Design, Advisor to 2<sup>nd</sup> Chapter Partners) (88)**

Liam and Richard spoke to the submission and made no additional comments. Further information (presentation and tabled material) was presented at the meeting and is appended to these minutes.

**Foodstuffs North Island Limited (David Boersen, Development Manager – Property Investment, Foodstuff North Island Limited, Daniel Sadlier, Lawyer, Simone Williams, Associate, Barker & Associates, and Mike Nixon, Principal Transport Consultant) (90)**

David and Daniel spoke to the submission and made no additional comments. Further information (tabled material in two parts) was presented at the meeting and appended to these minutes.

**Grant Stevenson (99)**

Grant spoke to his submission and made the following additional comments:

- He is interested in the points made by a previous submitter around hydrology and Bunnythorpe which he had not been aware of.
- He supports a focus on community and for Council to ensure due diligence is undertaken.

**Robert McLachlan (101)**

Robert spoke to his submission and made no additional comments.

Meeting adjourned at 10.35am  
Meeting resumed at 11.02am

**Palmerston North Airport Limited (Mark Lash, Chief Commercial Officer) (106)**

Mark spoke to the submission and made no additional comments.

**Peter Davies (108)**

Peter spoke to his submission and made the following additional



comments:

- He is supportive of the area where the Bunnythorpe business park is proposed as it consolidates industrial developments which seems to be an excellent idea.

**KiwiRail (Anna Allen, Executive General Manager Property and Pam Butler, Senior RMA Advisor) (109)**

Anna and Pam spoke to the submission and made the following additional comments:

- KiwiRail supports the removal of all level crossings.

**LJ Futures Trust (Lynley Annand) (110)**

Lynley spoke to the submission and made additional comments outlined in the tabled material appended to these minutes.

**Stephen Kelly (131)**

Stephen spoke to his submission and made the following additional comments:

- Consultation has been reasonable but a decision on the final plans needs to be made as quickly as possible, so people are not left in a position where they cannot move on with their lives.

**Christine Staples (116)**

Christine spoke to her submission and made the following additional comments noted below. Further information was tabled at the meeting and is appended to these minutes.

- Simplify the information for easy understanding and absorption of all that is happening.

**Ian Staples (117)**

Ian spoke to his submission and made no additional comments.

The meeting adjourned 12.14pm

The meeting resumed at 1.07pm

**Jon Roygard, Group Manager Catchment Operations, Horizons Regional Council (18)**

Jon spoke to his submission and made the following additional comments:

- This is a Horizons staff submission.
- Although Horizons staff were involved in developing the draft strategy, Jon was not involved in producing the draft strategy.

**David and Fiona Odering, (23)**

David spoke to his submission and made the following additional comments below. Further information (presentation slides) was tabled at the meeting and is appended to these minutes.

- The submission is representative of his family and their property, not of his company, SOCO Limited.

**Niuvaka Trust (Dana Kunaiti, General Manager, Analena Siu, Community Connector, Latai (youth) and William Tamutamu, Project Coordinator) (35)**

Dana, Analena, Latai and William spoke to the submission and made additional comments outlined in the slides that were presented at the meeting and are appended to these minutes.

**Dale O'Reilly (36)**

Dale spoke to her submission and made the following additional comments below. Further information was tabled at the meeting and is appended to these minutes.

- Bunnythorpe is one of only two rural villages in New Zealand not recognised as a settlement by Stats NZ.
- Shared some of the history between Manawātū District Council and Palmerston North City Council.
- If this plan goes ahead this will cause social cohesion issues for the community of Bunnythorpe.

**Whakarongo Holding Company Ltd (Paul Thomas, Thomas Planning Ltd, Kevin Judd, Resonant Consulting Ltd, John Maassen, Barrister, Matthew Currie, Homewood Property) (80)**

Paul, Kevin, John and Matthew spoke to the submission and made no additional comments. Further information (two slideshows) was tabled at the meeting and is appended to these minutes.

**Homewood Property (Matthew Currie) (104)**

Matthew spoke to his submission and did not make any additional comments.

**Beryl Brown (45)**

Beryl spoke to her submission and made no additional comments. Further information was tabled at the meeting and is appended to these minutes.

**Clair Reeves (57)**

Clair and Ian spoke to their submission and made the following additional comments:

- Their main question is why would you leave two houses out of the plan in the middle of an industrial area.

**Warren and Vicki Bradley (63)**

Warren and Vicki spoke to their submission and made no additional comments.

**Fonterra Limited (Laura Jeffries, Environmental Policy Manager, Susanne O'Rourke, National Environmental Manager, Philippa Fourie, Regional Engagement Manager) (75)**

Laura, Susanne and Philippa spoke to the submission and made no additional comments.

**Robert Gibb (118)**

Robert spoke to his submission and made additional comments outlined in the further information (slideshow) that was presented at the meeting



and is appended to these minutes.

He also notes his statements are on behalf of Green Taskforce All Saints with the backing of Environmental Manawatū Network.

**Aaron Fox (122)**

Aaron spoke to his submission and made no additional comments.

**Dr Ruth Gorinski on behalf of Mr & Mrs Adams (71)**

Dr Gorinski spoke on behalf of the submitters and made no additional comments.

The meeting adjourned at 3.31pm  
The meeting resumed at 3.52pm

**Moira Devine (136)**

Moira spoke to her submission and made no additional comments.

**Heritage Estates (2000) Ltd (John Farquhar, Owner, Amanda Coats, Proarch Consultants Limited) (107)**

John spoke to his submission and made no additional comments.

**Jeff Twigge (102)**

Jeff spoke to his submission and made no additional comments.

**AgResearch (Graeme Mathieson, Senior Consultant) (94)**

Graeme spoke to the submission and made no additional comments.

**Transpower New Zealand Limited (Rebecca Eng, Technical Lead) (65)**

Rebecca spoke to the submission and made no additional comments.

### **Karakia Whakamutunga**

Councillor Te Kenehi Teira closed the meeting with karakia.

The meeting finished at 4.37pm

Confirmed 20 May 2024

**Chair**

## MEMORANDUM

**TO:** Future Development Strategy Joint Steering Group

**MEETING DATE:** 20 May 2024

**TITLE:** Deliberations Report - Draft Palmerston North Future Development Strategy 2024

**PRESENTED BY:** Keegan Aplin-Thane, Senior Planner Palmerston North City Council and Leana Shirley, Senior Planner Horizons Regional Council

**APPROVED BY:** David Murphy, Chief Planning Officer

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### RECOMMENDATIONS TO FUTURE DEVELOPMENT STRATEGY JOINT STEERING GROUP

1. That the Joint Steering Group agree the following updates to the draft Palmerston North Future Development Strategy 2024:
  - (a) as recommended in Table 1
  - (b) to (n) as recommended in Table 2
  - (o) as recommended in Table 3
  - (p) as recommended in Table 4
  - (q) to (ee) as recommended in Table 5
  - (ff) to (ii) as recommended in Table 6
  - (jj) to (tt) as recommended in Table 7
  
2. That the Joint Steering Group recommend the final draft of the Palmerston North Future Development Strategy 2024 (incorporating changes agreed above) for adoption by Palmerston North City Council and Horizons Regional Council.

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### 1. ISSUE

- 1.1 Palmerston North City Council and Horizons Regional Council have jointly prepared a draft Future Development Strategy ('the Strategy') for Palmerston North according to the requirements of the National Policy Statement on Urban Development 2020.
- 1.2 The National Policy Statement on Urban Development 2020 requires that consultation on the draft Future Development Strategy uses the special consultative procedure.



- 1.3 As part of the special consultative procedure, public consultation was held for six weeks followed by a hearing for those submitters who wished to speak to their submission in person.
- 1.4 This report provides an analysis of the submissions received and recommendations from management for the treatment of the matters raised in the submissions.
- 1.5 A [report to the 13 May 2024](#) meeting included a [summary of submissions](#).

## **2. BACKGROUND**

- 2.1 The National Policy Statement on Urban Development 2020 requires Horizons Regional Council and Palmerston North City Council to jointly prepare a Future Development Strategy for Palmerston North (a tier 2 urban environment) in time to inform, or at the same time as preparation of, the Long Term Plan.
- 2.2 The purpose of the Strategy is to set out how the two councils intend to:
  - Achieve well-functioning urban environments in our existing and future urban areas.
  - Provide at least sufficient development capacity over the next 30 years to meet expected demand.
  - Assist the integration of planning decisions under the Resource Management Act 1991 (RMA) with infrastructure planning and funding decisions under other legislation.
- 2.3 The Strategy also includes a statement of hapū and iwi values and aspirations for urban development.
- 2.4 The purpose of the Strategy is to take a high-level view of what type of urban development will occur, and where, in Palmerston North in the coming decades. It is not intended to provide the detail that will enable site-specific planning. A range of other, more detailed planning processes are required before a development project can proceed. These include:
  - Engaging with affected stakeholders and property owners.
  - Investigations such as transport and stormwater modelling, and geotechnical assessments.
  - Preparing master plans/structure plans.
  - District Plan zoning and related plan changes (note plan changes are required to have regard to the Future Development Strategy [Clause 3.17, NPS-UD]).
  - Regulatory permissions including subdivision, land use and building consents and engineering approvals.

- 2.5 The Strategy informs a range of other Council planning processes, including Long-Term Plans, Infrastructure Strategies, and priorities and decisions in Regional Land Transport and Public Transport Plans.
- 2.6 The Strategy consulted on from 26 of March to 5 May 2024.
- 2.7 The Strategy sets out where housing, business and industrial growth will occur in Palmerston North over the next 30 years along with the development and additional infrastructure required to support that growth.
- 2.8 The Strategy is largely consistent with Palmerston North City Council's existing growth plan for Palmerston North, setting out at a high level where and when growth will occur.
- 2.9 The Strategy explores the advantages and disadvantages of four approaches to providing for growth for Palmerston North:
- **Growing Up:** Providing for growth in our existing urban environments through infill and intensification of housing, business, and industry.
  - **Growing In:** Repurposing/rezoning pockets of industrial land<sup>1</sup>, and two previously identified reserves that are not required to meet community or recreation needs<sup>2</sup> It also means continuing to enable housing above ground floor level within the city centre.
  - **Growing Out:** Providing for growth via greenfield areas at the edges of the city. This includes:
    - The development of our existing greenfield growth areas in the short<sup>3</sup> to medium<sup>4</sup> terms – the Mātangi, Whakarongo, Napier Road Extension Area, and Kikiwhenua Residential areas, and the North East Industrial Zone Extension.
    - Greenfield growth in the medium-term and long-term<sup>5</sup> for homes at Aokautere and Kākātangiata and neighbourhood centres in these growth areas,
    - Greenfield growth to the northeast of the city in line with the Te Utanganui Masterplan to support industrial growth.
  - **Village Growth:** Greenfield and infill growth in our rural villages; Ashhurst, Bunnythorpe, Longburn and Linton.

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<sup>1</sup> Roxburgh Crescent industrial area, the Albert Street Depot and pockets of industrial zoned land on Botanical Road and Joseph and West Streets.

<sup>2</sup> Huia Street Reserve and the Former Terrace End Bowling Club on Summerhays Street

<sup>3</sup> Within the next three years.

<sup>4</sup> Between 3 and 10 years.

<sup>5</sup> Between 10 and 30 years.

2.10 The preferred growth option set out in the Strategy and the Statement of Proposal is a **balanced approach**.

2.11 A balanced approach to growth incorporates all four options in a way that will provide for expected market demand across a range of types and locations for housing, business, and industrial use. Council can enable intensification options while still enabling greenfield growth to meet market demand. The balanced approach also takes into account the varied constraints that occur within our existing urban environment.

### 3. CONSULTATION

3.1 The consultation process for the Strategy has been broadly described in the Summary of Submissions report presented to the Joint Steering Committee at the Hearing of Submissions meeting held on the 13 May 2024.

3.2 During the hearings, a variety of comments were made by submitters relating to the consultation process. Officers make the following comments to clarify issues raised at the hearings:

- Aside from Te Utanganui, consultation was broad on the Future Development Strategy and utilised existing Long-Term Plan engagement events to socialise the Strategy.
- The process for consultation on Te Utanganui is through the Strategy. Socialisation of the Masterplan was undertaken early with affected and surrounding landowners to prepare them for the consultation process. This included drop-in sessions in October for landowners with zoning implications indicated for their property, and in December for landowners with an adjacent or surrounding interest in the Masterplan area.
- Concern was raised by Mr Twigge (submitter 102) about being left out of the October mail drop. After the hearings officers further checked Mr Twigge's property in relation to the Masterplan and are satisfied that while he did not receive an October letter, he was sent a letter as part of the December drop-in sessions as his property is not included in the area identified for a potential zone change in the Masterplan.
- Letters were sent to landowners within Manawatū District in the area surrounding Te Utanganui as part of the December drop-in sessions.

### 4. SUBMISSIONS SUMMARY, THEMES AND RECOMMENDED CHANGES

4.1 A total of 145 submissions were received. Seven of these were received after the deadline. Some of the late submissions were received on 9 May 2024 which was the deadline for submissions to the Long-Term Plan. All late submissions were accepted.



- 4.2 Feedback received in the late submissions has been incorporated into the summary analysis, comments, and recommendations provided in this report and its attachments.
- 4.3 A further 21 submissions to the Palmerston North City Council Long-Term Plan have been received with submission points related to the Future Development Strategy. These were received after the completion of the summary of submissions and this report. We will speak to these during the presentation of this report.
- 4.4 32 submitters spoke to their submissions at the Hearing on 13 May 2024.
- 4.5 Sections 5 – 11 of this report address the submitters' answers to the consultation questions.
- 4.6 A brief summary is provided of the themes identified for each of the questions.
- 4.6.1 A significant number of the points raised by submitters were outside the scope of the Future Development Strategy. Most of these points can be addressed through other processes or by other organisations, for example:

#### **Palmerston North City Council**

- Future Development Strategy Implementation Plan
- Future reviews of the Future Development Strategy
- Long-Term Plan
- District Plan Changes
- Review of the Palmerston North Integrated Transport Initiative
- Vegetation framework review

#### **Horizons Regional Council**

- Future Development Strategy Implementation Plan
- Future reviews of the Future Development Strategy
- Long-Term Plan
- Resource consent processes
- Regional Land Transport Plan
- Other regional planning processes

#### **Other**

- Responsibility of other agencies
- Other national policy statements or environmental standards

- 4.6.2 These points, and the relevant process for addressing them, have been recorded in Attachments 1-9 to this report. Officers will ensure they are considered as part of the appropriate process.

- 4.6.3 Several issues and/or requests raised by submitters have prompted officers to consider updates to the Strategy. Officer comments and recommendations in response to these issues/requests are provided in this report.

## 5. WELL-FUNCTIONING URBAN ENVIRONMENTS

(Refer to page 18 of the draft Strategy)

### Consultation question 1: Is there anything else you think should be part of our urban areas to make them well-functioning?

- 5.1 26 comments supported the definition of well-functioning urban environments as drafted. The main theme (6 comments) was support for housing within a walkable distance to shops, schools, community services and parks.
- 5.2 24 comments requested a change to the definition of well-functioning urban environments. The only theme arising from these comments (7) was a request to reference support for all cultures.
- 5.3 Officers recommend **one** change to the definition of well-functioning urban environments in the Strategy as set out in Table 1 below. Refer to Attachment 1 for the officer responses to all submission points, including those that are more appropriately addressed through different means.

Table 1: Recommended change to the definition of well-functioning urban environments

Submission	Officer Response	Officer Recommendation
Requests a city that is easier for our Pasifika to live and thrive in	We acknowledge the thrust of the submission relates to larger house sizes that reflect the intergenerational living traditions of our Pasifika community. We recommend a change to one of the existing criterion to acknowledge the diversity of need that we aspire to provide for in the city.	a) Replace "Māori have the ability to express their cultural norms and traditions including papakāinga options" with " <u>Māori and other cultures have the ability to express their cultural norms and traditions</u> "
Requests reference to supporting all cultures	Rangitāne (132) recommend provision is made for other cultures to express their cultural traditions and norms under the korowai of Rangitāne. A criterion to this effect may suffice for capturing the existing provision for Māori traditions as well as other cultures. Papakāinga is already provided for under the criterion for "Māori development (including papakāinga, cultural hubs and new marae) is a readily available option, so a replacement of the Māori	

	traditions criterion would not compromise provision for papakāinga.	
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## 6. GROWTH OPPORTUNITES

*(Refer to page 35 of the draft Strategy)*

### Consultation question 2: Do you know of any opportunities we've missed?

- 6.1 21 suggestions were made for growth opportunities that have been missed. All of these were out of scope for the Future Development Strategy or are more appropriately addressed through different means.
- 6.2 There are no recommended changes to the Strategy related to growth opportunities. The majority of requests for additional sites or removal of sites from the Strategy are addressed under recommendations for growing in, up and out further below in this report. Refer to Attachment 2 for the officer responses to all submission points, including those that are more appropriately addressed through different means.

## 7. GROWTH CONSTRAINTS

*(Refer to Appendix 1 of the draft Strategy, page 71)*

### 7.1 Consultation question 3: Do you think there are any constraints we've missed?

- 7.1.1 There were 85 comments related to constraints. Five themes can be identified (where there are more than five comments):
  - a) Affordability of growth infrastructure (16)
  - b) Requests that 5G cell phone towers in proximity to the airport be included as a constraint (13)
  - c) Include traffic flows as a constraint to manage (9)
  - d) Highly productive land is an important constraint (7)
  - e) Requests greater emphasis on flood prone areas as a constraint (6)

All these themes are already addressed in the draft Strategy or are more appropriately addressed through different means (see Attachment 3).

- 7.1.2 A range of comments prompted some suggested changes to the Constraints section of the Strategy. Officers recommend **13** changes as set out in Table 2 below. Refer to Attachment 4 for the officer responses to all submission points, including those that are more appropriately addressed through different means.



Table 2: Recommended changes to the Strategy Appendix 1: Growth Constraints

Submission	Officer Response	Officer Recommendation
Concern about community severance risks to Bunnythorpe from the Regional Freight Ring Road	Accept. A proposed business case to identify the alignment of the Regional Freight Ring Road is in years 2 and 3 of the PNCC Long Term Plan. The business case will involve a discussion with Bunnythorpe and wider community about how best to settle on an alignment that has least impact on communities. In particular, the Bunnythorpe community has raised concern about the Manawatū Regional Freight Ring Road creating physical and community severance.	b) Amend Map 34 (State highway network) to highlight existing and future community severance risks.
Requests additional constraints to be considered regarding the coping capacity for the natural landscape and native ecosystems	Accept. We currently hold information that could assist in satisfying the submitter's request. These include landscape units assessed for the Palmerston North Landscape Inventory 2011.	c) Add a new constraint to Appendix 1 acknowledging landscapes. Include information relating to the Palmerston North Landscape Inventory 2011, bush remnants, known wetlands and significant bush areas, streams and the Tararua Range Landscape Protection Area.
Requests inclusion of natural river paths, streams, and springs as a constraint	Accept. We currently hold information that could assist in satisfying the submitter's request. These include streams, but we note that Palmerston North does not have natural springs to factor into this constraint.	
Requests inclusion of reverse sensitivity risks to industrial and rural activities as a constraint	Accept. Reverse sensitivity risks related to rail, state highways, and rural-residential development are acknowledged in Appendix 1, however risks associated with industries or facilities like the submitters note have not. We would recommend including a specific section related to reverse sensitivity as a constraint in Appendix 1, which should be broadened to capture other sites worth acknowledging. We are confident that this would not impact our current preferred growth option, as any possible reverse sensitivity effects would be assessed within a District Plan change.	d) Add a new constraint to Appendix 1 to reflect sites and activities across the district that are anticipated to have reverse sensitivity risks to manage.

Requests changes to the constraints and infrastructure sections of the Strategy to more clearly recognize the National Policy Statement on Electricity Transmission	Accept	e) Amend text to the effect of Transpower's submission relating to being more specific about national grid infrastructure.
Recognise the national gas network as a constraint	Accept. We note the national gas network had not featured in the draft FDS but do not consider this to be material to the consideration of growth areas. Avoidance measures can be considered in the rezoning process.	f) Add the national gas network to the National Grid section of Appendix 1 and Map 36.
Requests that the FDS is clearer about reverse sensitivity effects on the national grid	Accept.	g) Amend text to the effect of Transpower's submission relating to being more specific about reverse sensitivity effects on the National Grid.
Market-led approaches are considered a constraint to achieving diverse housing design and tenure needed to develop local communities	Accept. We recommend including text under page 72 of Appendix 1 to reflect the limitations that Council's role in housing and business growth has in meeting broader outcomes.	h) Add a new constraint to Appendix 1 as follows: <b><u>"Council's influence over the market.</u></b> <u>Key levers that Councils have in influencing community outcomes for housing and business growth are limited in their scope. Our communities of interest have told us in the Housing and Business Needs Assessment 2023 that there are limited options for inter-generational living, accessible housing, and larger homes. These options either don't represent projected household sizes that our market is driven to cater for, or represent possible increased costs to construction that reduce a developer's ability to remain market-competitive. Diverse housing tenure models and sustainable construction are areas of interest to our community, but there is limited scope for our District Plan, Development Contributions Policy, and our administration of the Building Act to be able to</u>

		encourage or require these outcomes."
Requests consideration of our solid waste capacity as a constraint	Accept. Solid waste is a constraint to all growth in the district but is not considered a location-specific factor for deciding on options for meeting demand for housing and business land.	<p>i) Add a constraint to Appendix 1 as follows:</p> <p><b><u>"Landfill capacity:</u></b></p> <p><u>Bonny Glen landfill in Turakina services the greater regions solid waste needs and is privately owned. Bonny Glen is a Class A municipal solid waste facility that is consented till 2055 and at current filling rates has airspace remaining for disposal for a projected 25-30 years'. Risks to this projected landfill capacity include:</u></p> <ul style="list-style-type: none"> <li><u>- Growth in districts serviced by Bonny Glen (Whanganui, Taranaki, Ruapehu, Rangitikei, Manawatū, Kapiti, Horowhenua and Wairarapa).</u></li> <li><u>- Contractual arrangements with the landfill company (who has contractual access, for what and over what period).</u></li> <li><u>- Inert C&amp;D (construction and demolition) waste or other bulky materials competing for premium disposal airspace. There are no outlets of significance in the lower NI for treated timber or other demolitions materials, with the exception of concrete to crushing outlets.</u></li> <li><u>- Future changes to waste acceptance criteria from central government or the landfill regulator Horizons RC. Eg. Organics or consent condition changes.</u></li> <li><u>- Future changes to waste recyclables.</u></li> <li><u>- Reducing capacity in surrounding Wellington, Tararua and Hawkes Bay regions."</u></li> </ul>



Requests that private developer agreements be acknowledged as a way of funding growth for Kākātangiata earlier than the medium term	Accept. Developer agreements have already been referred to on page 71, but we acknowledge their role in expediting infrastructure delivery has not been made clear enough in the Strategy.	j) Amend text on page 71 as follows:  "In addition, these changes do not prevent developers lodging private plan change applications <u>or entering into developer agreements to enable</u> development sooner than we have scheduled the funding to support growth."
Requests consideration of the constrained funding environment for transport	Accept. We recommend including this consideration as new text under page 71.	k) Add text to page 71 as follows:  " <u>Funding for transport changes in the State Highway network anticipated for growth is significantly constrained. Funding commitments can change to adjust to national priorities. We need a variety of land-use, structure plan, staging, and local funding options to manage this risk. This risk is more acute in our greenfield areas than our existing urban environment. The business case process can assist in demonstrating value for money compared to other competing interests in the National Land Transport Fund.</u> "
Requests acknowledgement of the business case process for expediting outcomes in the Strategy		
Requests that wording is changed for the flood prone areas constraint to provide for engineering solutions where appropriate	We recommend including changes to the text in the Flood Prone Areas section of Appendix 1 to reflect further investigation required on appropriate flood risk responses in Te Utanganui.	l) Amend text on page 78 as follows:  "Kākātangiata and Te Utanganui will address the risk posed by the flood prone areas <del>through</del> <u>by seeking to avoid</u> development within them. <u>Some areas within the Te Utanganui area require further flood risk assessment to understand whether appropriate avoidance or mitigation measures can be put in place to enable these to be developed.</u> "
Acknowledge opportunities for site-based stormwater management and upstream benefits from the KiwiRail Hub	The relief sought is already addressed in the current text where it is signalled that stormwater needs to be	m) Change reference to Map 30 on page 73, to Map 28.

and other developments in the stormwater ponding constraint	carefully managed in greenfield growth areas. However, it is noted that the notified version of the FDS incorrectly refers to Map 30 as the 200-year model showing stormwater depths. This submitter has correctly identified this as Map 28.	
Requests an acknowledgement of the role of aggregate and quarrying to Palmerston North's future development and protect aggregate resources from alternative land uses or access constraints	We don't anticipate the identified growth areas in the Future Development Strategy to conflict with the aggregate locations identified by the submitter. Officers are open to further conversation about informing the next Future Development Strategy review in 2027. We recommend including further text under Geographical and Physical Constraints on page 72 to recognise the need for local aggregate supplies to support growth.	n) Add the following text to Geographical and Other Physical Constraints section on page 72: <u>"Aggregate is an essential resource for the construction of housing and business areas. Projected housing demand in the district equates to demand for 103,000 tonnes of aggregates per year. Because of the high travel costs associated with aggregates, consideration of local aggregate resources when planning urban growth is important."</u>

## 8. GROWING IN

(Refer to Appendix 3 of the draft Strategy, page 116)

### 8.1 Consultation question 4: Do you agree or disagree with the extent we've shown for 'Growing In'?

Number of submitters		
Submissions in support: 44	Submissions in opposition: 40	Undecided submissions: 17

8.2 21 comments in support of the extent of 'Growing In' presented in the draft Strategy. The main theme arising from these comments was "More efficient use of land and infrastructure" (13)

8.3 117 comments expressed concerns about 'Growing In'. Eight themes can be identified (where there are more than five comments):

- a) Preservation of and greater need for greenspaces (23)
- b) Increased pressure on services (14)
- c) Concern about increased antisocial behaviour/crime (12)
- d) Neighbours end up living too close to each other (11)
- e) Noise effects (8)
- f) Not supportive of medium/high density for growing in (8)
- g) Pollution effects (6)

h) Concern about poor urban design outcomes (6)

All these themes are either out of scope, already addressed in the draft Strategy, or are more appropriately addressed through different means (see Attachment 4).

**8.4 Consultation question 5: Do you have any other thoughts about 'growing in'?**

8.5 50 specific requests were raised regarding 'Growing In', all of which are already addressed in the draft Strategy or are more appropriately addressed through different means.

8.6 Of the 50 comments, 21 mentioned the opportunities related to underutilised land and buildings in the city centre.

**8.7 Consultation question 6: Are there any other 'growing in' opportunities you think we've missed?**

8.8 Officers recommend **one** change as set out in Table 3 below. Refer to Attachment 4 for the officer responses to all submission points, including those that are more appropriately addressed through different means.

*Table 3: Recommended change to "Growing In"*

Submission Theme	Officer Response	Officer Recommendation
Concern about reverse sensitivity effects if Massey land were to be repurposed for housing	Accept	o) Map Ag Research site as a reverse sensitivity site. (Cf. recommendation (d))

**9. GROWING UP**

*(Refer to Appendix 3 of the draft Strategy, page 116)*

**9.1 Consultation question 7: Do you agree or disagree with the extent we've shown for 'growing up'?**

Number of submitters		
Submissions in support: 41	Submissions in opposition: 46	Undecided submissions: 9

9.2 19 comments in support of the extent of 'Growing Up' presented in the draft Strategy. While there were no dominant themes, seven comments observed that this approach provides better options for public, private, and Māori housing.

9.3 133 comments expressed concern about 'Growing Up'. Ten themes can be observed (where there are more than five comments):

- a) Height-related effects such as sunlight and privacy for neighbours (25)
- b) Concern about network infrastructure capacity (16)

- c) Neighbours living too close to each other (13)
- d) Concern about quality of life, social and mental health effects (13)
- e) Reduced private outdoor space (13)
- f) Pressure on carparking (6)
- g) Impact on existing character and heritage (6)
- h) Higher density is not suitable for meeting everyone's needs (5)
- i) Noise effects (5)
- j) Concern about the quality of development (5)

All these themes are either out of scope, already addressed in the draft Strategy, or are more appropriately addressed through different means (see Attachment 6).

**9.4 Consultation question 8: Do you have any other thoughts about 'Growing Up'?**

9.5 There were 19 specific requests raised regarding 'Growing Up' most of which are already addressed in the draft Strategy or are more appropriately addressed through different means. Some comments did not require any treatment.

**9.6 Consultation question 9: Are there any areas we've missed to 'Growing Up'? If so, where?**

9.7 There are no recommended changes to the Strategy related to 'Growing Up'. Refer to Attachment 5 for the officer responses to all submission points, including those that are more appropriately addressed through different means.

**10. GROWING OUT**

*(Refer to Appendix 3 of the draft Strategy, page 123)*

**10.1 Consultation question 10: Do you agree or disagree with the extent we've shown for 'Growing Out'?**

Number of submitters		
Submissions in support: 54	Submissions in opposition: 36	Undecided submissions: 8

10.2 There were 28 comments in support of the extent of 'Growing Out' presented in the draft Strategy. Only one theme was apparent with five comments mentioning that "Growing Out" makes it easier to provide a large enough land supply to keep the market competitive.

10.3 On the other hand, there were 68 comments expressing concern about 'Growing Out'. The five themes identified were:

- a) Retention of highly productive land (17)
- b) Concern around natural hazard risk such as flood prone areas, land stability and liquefaction (10)



- c) Concern about protecting green spaces and enhancing public transport, schools, and local shopping centres (7)
- d) Transport issues related to car-dependency, car parking needs, and unresolved pre-existing transport issues (7)
- e) Concern about the cost burden and viability of providing growth infrastructure (7)

**10.4 Consultation question 11: Do you have any other thoughts about 'Growing Out'?**

10.5 30 specific requests were raised regarding 'Growing Out', almost all of which are already addressed in the draft Strategy or are more appropriately addressed through different means. One request has been recommended as a change (see Table 4 below).

10.6 The themes arising from these requests (receiving more than 5 comments) were:

Prioritise development within existing urban environments before growing out (6)

Request for 160 Napier Road to be included in the extent of Growing Out (5)

10.7 Officers recommend **one** change as set out in Table 4 below. Refer to Attachment 6 for the officer responses to all submission points, including those that are more appropriately addressed through different means.

*Table 4: Recommended change to 'Growing Out'*

Submission	Officer Response	Officer Recommendation
Request for 160 Napier Road to be included in the extent of growing out	The proposed 160 Napier Road site has merit for residential use, however, faces highly productive land and stormwater constraints that are yet to have been fully assessed through a private plan change. We recommend that the site be included in the Future Development Strategy, but as a medium-term growth area to reflect the uncertainty about the highly productive land and stormwater constraints. The applicant would have to demonstrate that the tests in the National Policy Statement for Highly Productive Land can be met in order to justify rezoning productive land.	p) Add 160 Napier Road to the Future Development Strategy as a medium-term growing out residential area.

## 11. ANYTHING ELSE?

### 11.1 Consultation question 12: What other information could be useful for considering the next 30 years of growth for the district?

11.2 In answer to this question there were 50 comments related to infrastructure. No strong themes were identified, however support for the expansion and enhancement of the public and active transport network was affirmed in five comments and there were seven requests for greater passenger rail options and frequency.

11.3 A range of other comments prompted some suggested infrastructure-related changes to the Strategy. Officers recommend **15** changes as set out in Table 5 below. Refer to Attachment 7 for the officer responses to all submission points, including those that are more appropriately addressed through different means.

*Table 5: Recommended infrastructure-related changes*

Submission	Officer Response	Officer Recommendation
Requests a correction to the Schools map to acknowledge that the Manukura School site is now open and operating	Accept	q) Amend Map 24 to change the Manukura school site from 'future school' to 'high school'
Requests clarity on the reference to revoking SH3	Accept	r) Amend text on page 58 as follows: Once the new freight route is operational, <u>we will explore the advantages of revoking the existing state highway status of State Highway 3 will be revoked and eventually become more of managing Rangitikei Line as a local road in nature.</u>
Requests clarity on how Te Ahu a Turanga and Ōtaki to North of Levin will influence future growth	Accept	s) Add the following text to Page 13: <u>"Te Ahu a Turanga and Ōtaki to North of Levin will result in more efficient freight movements into and out of Palmerston North, encouraging the utilisation of the city's future industrial land use. Alongside this it could encourage more people to commute into Palmerston North from the East and South, as</u>

		<u>well as commuters from Palmerston North south towards Wellington."</u>
Identify Rangitāne aspirations for a kura-a-iwi in the school infrastructure section	Accept. We recommend including text in the Schools infrastructure section of the FDS to satisfy this request. Because no locations were specifically mentioned, we are assuming this aspiration is not currently tied to any particular sites.	t) Add text on page 64 as below: "Rangitāne aspire to <u>plan and develop kura-a-iwi (schools with localised curriculum based on iwi values) and grow the number of opportunities for tamariki o Rangitāne and tamariki Māori in Palmerston North."</u>
Requests that the labelling of State Highway Improvement maps are amended to be consistent with language in the Palmerston North Integrated Transport Initiative	Accept	u) Amend the key on Map 22 to rename "Potential New Road - Alternative Southern Bridge Location" to "New Road Sub Option"
		v) Amend the key on Map 22 to rename "Potential Road Upgrade" to "Road Upgrade Sub Option"
Lack of assessment into whether we will reach our future water supply limit in the District.	The constraints associated with water supply and growth are identified in the FDS. At the present time, it is understood that water is available within the Manawatū Groundwater Management Zone. This will be assessed further as individual plan changes for growth areas progress.	w) Amend the text on page 40 as follows: "New bores will be required to support growth. Indicative locations for the bores are shown in Map 11. <u>At the present time, we understand that there is water available for abstraction within the Manawatū Groundwater Management Zone.</u> Demand for groundwater associated with the growth areas is not yet fully known, nor the impacts of the bores on groundwater users and groundwater fed waterbodies."
Request to update National Grid assets on the National Grid map	Accept.	x) Update the National Grid map in Section E, page 93, to reflect the map in submission 65.
Requests separate references between the national grid and local electricity network in the introduction of Section E	Accept. The change assists in distinguishing between local and national networks.	y) Add text to page 38 as follows: "Additional infrastructure is: • land transport not controlled by
Requests that flood	Accept. In the National	

<p>protection structures are moved to the Additional Infrastructure section of the Strategy, and clarity on infrastructure funding expectations for growth areas that rely on upgrades to this infrastructure.</p>	<p>Policy Statement on Urban Development definitions, flood protection infrastructure is not included in either 'development infrastructure' or 'additional infrastructure'. However, given the important role flood protection plays in the city, inclusion of this as part of our definition for Additional Infrastructure is considered appropriate.</p>	<p>Horizons Regional Council or Palmerston North City Council such as the State Highway network</p> <ul style="list-style-type: none"> <li>• public open spaces, including city-wide and local reserves</li> <li>• community infrastructure</li> <li>• schools,</li> <li>• healthcare facilities</li> <li>• telecommunica- tions network, <del>and</del></li> <li>• <u>the National Grid,</u></li> <li>• <u>local</u> electricity and gas networks <u>and</u></li> <li>• <u>flood protection infrastructure"</u></li> </ul>
		<p>z) Add a new paragraph at the end of page 38 as follows:  <u>"Flood protection is an important element of supporting urban growth. Horizons Regional Council's 30-year Infrastructure Strategy and draft 2024 Long-term Plan identifies planned flood protection works for the City over the course of this Strategy. Flood protection levels and any future improvements will likely influence the timing of growth for the city."</u></p> <p>aa) Move Flood Protection Structures on pages 80-81 to the Additional Infrastructure section under Section E.</p>
<p>Requests more detail on how the Strategy intends to resolve gaps in flood protection infrastructure</p>	<p>Accept. Recommend text changes to page 80 and inclusion of a footnote to Maps 29 and 30 reference to data sources for the flood modelling information.</p>	<p>bb) Amend text on page 80 as follows:            "These stopbanks provide protection from the Manawatū River, the Mangaone Stream and the Ashhurst Stream. The</p>



		<p>city stopbank network was upgraded to 1 in 500-year protection plus 600mm freeboard (room for uncertainty) following the 2004 floods, while the Ashhurst Stream stopbank provides 1 in 100-year protection plus 300mm freeboard. <u>Some areas we have identified for future growth (for example Ashhurst), are not included for investigation, scoping, increasing, or building of flood protection in Horizons' Infrastructure Strategy for the next 30 years. As such there are currently no plans for new stopbank development within the city boundary. Horizons' Infrastructure Strategy identifies minor works planned that relate to increasing the resilience of the network rather than increasing the current level of flood protection. Also, Given there are no plans for new or upgraded stopbank development this may be a constraint to our growth, particularly in Ashhurst where we know some of the growth areas require a stopbank upgrade. To address this constraint, both Councils, landowners, the community, and infrastructure providers will need to work together to establish ways of addressing these constraints (for</u></p>
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		<p><u>example access to alternative funding). In some cases, these growth areas need to be reconsidered in future versions of this strategy.</u></p> <p>Rules in the Regional Plan prevent development (particularly intensification) in close proximity to the protection structures, which growth will need to take into account. Also, <del>given there are no plans for new or upgraded stopbank development this may be a constraint to our growth, particularly in Ashhurst where we know some of the growth areas require a stopbank upgrade"</del></p> <p><u>Flood protection structures do not guarantee that communities are safe from floods that exceed the protection level indicated on Map 30, so flood risk is never eliminated. Increasing severity and frequency of rainfall events due to climate change is likely to diminish the expected protection levels of the stopbanks in future years.</u></p>
<p>Page 38 refers to "our Infrastructure Strategy". Recommend that this more clearly reflects that this a reference to PNCC's Infrastructure Strategy and Long-term Plan</p>	<p>Accept.</p>	<p>cc) Change reference on page 38 as follows: <del>Our Palmerston North City Council's</del> Infrastructure Strategy and draft 2024 Long Term Plan has scheduled funding of development infrastructure in particular years. The timing when growth areas will be infrastructure-ready is broadly shown in Figure 2, page 25.</p>

Lack of assessment into land suitability for wastewater discharges onto land	Accept. The Nature Calls project has assessed land suitability for wastewater discharge and the study area is available online (pncc.govt.nz/Council/What-were-doing/Ongoing-projects-and-programmes/Nature-Calls/Nature-Calls-update). We recommend that we amend map 12 to reflect this spatially.	<p>dd) Amend Map 12, page 43, to include the area of interest for land discharge for Nature Calls.</p> <p>ee) Add the following text to page 42:  <u>"The area of interest for land suitable to discharge treated wastewater for Nature Calls is shown on Map 12. The requirement for land for Nature Calls has the potential to conflict with latter stages of Kōkātangiata, which we would expect to explore further along with any potential reverse sensitivity effects in a wastewater servicing assessment in a District Plan change."</u></p>
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**11.4 Consultation 13: Do you have any other comments you'd like to make on the future development of Palmerston North City and district?**

11.5 70 comments were made in response to this question. Five themes were identified (receiving five or more comments):

- a) Concern about the risk of population and local economic forecasts changing (8)
- b) Requests for greater acknowledgement of how surrounding districts influence our Future Development Strategy (7)
- c) Concern relating to consultation such as lengthy documents, weekend closing dates, overlapping consultations, and lack of independent peer review. (7)
- d) Requests for more engagement with the community (5)
- e) Support for a stormwater management strategy and/or improved stormwater evidence (5)

All these themes are already addressed in the draft Strategy or are more appropriately addressed through different means (see Attachment 8).

11.6 A range of other comments prompted some suggested changes and/or clarifications to maps and text in the Strategy. Officers recommend **four** changes as set out in Table 6 below. Refer to Attachment for the officer responses to all submission points, including those that are more appropriately addressed through different means.

Table 6: Recommended changes in relation to "Other Comments" on the Strategy

Submission	Officer Response	Officer Recommendation
Requests that the Palmerston North Integrated Transport Initiative is acknowledged in Figure 1	Accept. We recommend including reference to the Palmerston North Integrated Transport Initiative as it is not currently captured under national or local government direction in this document.	ff) Include reference to the Palmerston North Integrated Transport Initiative in Figure 1.
Requests that the importance and degree of alignment of the Palmerston North Integrated Transport Initiative is clarified in the Strategy	Accept. Including reference of PNITI to Figure 1 will demonstrate its importance to growth in the city. The growth areas are aligned with anticipated growth under PNITI. Smaller pockets of industrial areas indicated for future repurposing strengthen the consolidation of freight transport under PNITI.	
Update maps to better show the extent of Bunnythorpe	Accept. We acknowledge the extent used to represent Bunnythorpe in the FDS (extent of residential, industrial, and business zoned land) makes it difficult to discern the Bunnythorpe community at the scale that the FDS maps are shown. We recommend replacing the extent with the Stats NZ extent of Bunnythorpe.	gg) Update the base-map underlying all the maps in the Strategy to include the Stats NZ extent of Bunnythorpe.
Requests greater acknowledgement of how surrounding districts influence our Future Development Strategy	This is already partially addressed by pages 11 and 36. There is scope to draw reference to recently adopted or planned growth strategies for other districts.	hh) Add text to page 36 as follows: <u>Some of our neighbouring districts have recently completed their own projections and growth strategies. These include Rangitikei District Council's Community Spatial Plan, and Tararua District Council's Urban Growth Strategy. Manawatu District also has plans for an urban development framework to identify new growth areas. As these districts assess how much capacity they have to cater for housing and business demand, we will be able to better understand possible additional pressures on</u>



		<u>our district.</u>
Requests that the funding status of required infrastructure and its timing for delivery could be incorporated into the FDS and subsequent Implementation Plan	The final nature of growth programmes feeding into the Development Contributions Policy will not be known until the PNCC LTP is finalised. Given the FDS is required to be approved before final adoption of the LTP it is not possible to have the funding status of required infrastructure and its timing for delivery in the FDS. However, a note can be placed in the FDS pointing to the schedule of assets in the Development Contributions Policy that describes the infrastructure programmes in place to support growth.	ii) Add text to page 14 as follows: <u>Note: the schedule of assets for which development contributions will be used to fund growth is contained in the PNCC 2024 Development Contributions Policy (pages 73-78).</u>

## 12. TE UTANGANUI – CENTRAL NEW ZEALAND DISTRIBUTION HUB

Number of submitters	
Submissions in support: 37	Submissions in opposition: 11

- 12.1 There were 24 comments in support of Te Utanganui Masterplan presented in the draft Strategy, mostly in relation to more efficient freight movements, e.g. away from residential areas and closer to strategic transport assets (10), and the economic benefits such as job growth and agglomeration (7).
- 12.2 There were 144 comments expressing concern about Te Utanganui Masterplan. Eleven themes were identified (receiving more than 5 comments):
- a) Social and economic impact on local residents and neighbours (31)
  - b) Retention of highly productive land (17)
  - c) Transport effects (16)
  - d) Concern about consultation with the community, neighbours, farming representatives and local iwi (11)
  - e) Noise effects (9)
  - f) Risk of environmental degradation such as vegetation clearance, soil erosion, and air and waterway/groundwater contamination (9)
  - g) Concern about land acquisition for any growth infrastructure (7)
  - h) Concern about flood and liquefaction risk (7)
  - i) Concern about whether it's feasible (7)
  - j) Challenging topography in Area C (6)
  - k) Fragmented urban form in the Masterplan (5)

These concerns are already addressed in the draft Strategy or can be addressed through different means.

- 12.3 A range of other comments and requests prompted some suggested changes to Te Utanganui Masterplan. Officers recommend **11** changes as set out in Table 7 below. Refer to Attachment 9 for the officer responses to all submission points, including those that are more appropriately addressed through different means.

*Table 7: Recommended changes to Te Utanganui Masterplan*

Submission	Officer Response	Officer Recommendation
Fragmented urban form indicated in the Masterplan	Accept. We recommend removing Areas D and E from the Masterplan in part because of fragmentation of urban form.	jj) Remove Areas D and E from the Future Development Strategy and Te Utanganui Masterplan.
813 Roberts Line to be included in the scope of Area B	We acknowledge the advantages that the submitter described for including their land for investigation for industrial use. There are on site flood constraints which would need further enquiry to confirm if the site is suitable for industrial development. There is merit in including the site for consideration when developing the District Plan change for Areas A and B.	kk) Add 813 Roberts Line into the Future Development Strategy but not as part of the Te Utanganui Masterplan as a medium-term growing out industrial area.
815 Roberts Line to be included in the scope of Area B	We acknowledge the advantages that the submitter described for including their land for investigation for industrial use. There are on-site flood and highly productive land constraints which would need further enquiry to confirm inclusion in the Te Utanganui Masterplan however, which we recommend be conducted in the District Plan change for Areas A and B. We recommend inclusion of this site in the Future Development Strategy to support further investigation, but not to include this area in the Te Utanganui Masterplan until flood and highly productive land constraints are explored.	ll) Add 815 Roberts Line into the Future Development Strategy but not as part of the Te Utanganui Masterplan as a medium-term growing out industrial area.
129 Richardsons Line to be included in the scope of	We acknowledge the advantages that the	mm) Add 129 Richardsons Line into the Future

Area A	submitter described for including their land for investigation for industrial use. There are on-site flood, highly productive land and liquefaction constraints which would need further enquiry to confirm the site is suitable for industrial development. There is merit to include the site in the District Plan change for Areas A and B. We recommend inclusion of this site in the Future Development Strategy to support further investigation, but not to include this area in the Te Utanganui Masterplan until flood and highly productive land constraints are explored.	Development Strategy but not as part of the Te Utanganui Masterplan as a medium-term growing out industrial area.
109 and 125 Kairanga-Bunnythorpe Road be included in the Masterplan as a long-term growth area	We acknowledge the advantages that the submitter described for including their land for investigation for industrial use. There are on site flood, highly productive land and liquefaction constraints which would need further enquiry to confirm the site is suitable for industrial development. There is merit to include the site in the District Plan change for Areas A and B. We recommend inclusion of this site in the Future Development Strategy to support further investigation, but not to include this area in the Te Utanganui Masterplan until flood and highly productive land constraints are explored. We recommend including reference to the Bunnythorpe Business Park under Opportunities for Housing and Business Growth, but do not recommend further references requested by the submitter until further information on the viability of the growth area is confirmed.	<p>nn) Add 109 and 125 Kairanga-Bunnythorpe Road into the Future Development Strategy but not as part of the Te Utanganui Masterplan as a medium-term growing out industrial area.</p> <p>oo) Add the following text to page 36:  <u>"The Bunnythorpe Business Park proposed for 109 and 125 Kairanga-Bunnythorpe Road is a location with transport and proximity advantages to the Te Utanganui area. We expect that a private plan change is explored to better understand the viability of the Bunnythorpe Business Park given significant flood risk and potential geotechnical and ecological constraints that make this site uncertain."</u> </p>
Remove the proposed grade separation at Railway Road and Roberts Line	Precluding grade separation in advance of transport modelling and more detailed transport assessments would risk safe and efficient	pp) Replace the reference on the Te Utanganui Masterplan legend to 'over bridge' with a descriptor of 'future

	transport access between Area C, the KiwiRail Hub, Palmerston North Airport and the Regional Freight Ring Road. District Plan change or designation processes to implement Area C would be the appropriate time to assess impacts and effects of transport at the level that the submitter is seeking, which they would be an affected party to. Given a specific investigation into the most appropriate solution is some time away, a possible solution is to remove the reference in the Masterplan legend to 'over bridge' and replace with 'future connection.'	connection.'
Remove Area D from Te Utanganui Masterplan	Area D is spatially disconnected from the existing North East Industrial Zone, proposed KiwiRail freight hub and the core area shown in the proposed Te Utanganui Masterplan. Area D's spatial disconnection will not promote a compact, connected, and efficient logistics hub. Given the site is not needed for expansion to Te Utanganui until 2052, further work can be undertaken in the meantime to investigate other land expansion options.	qq) Remove Area D from the Future Development Strategy. Remove Area D from the Te Utanganui Masterplan.
Remove Areas E from Te Utanganui Masterplan	Area E is spatially disconnected from the existing North East Industrial Zone, proposed KiwiRail freight hub and the core area shown in the proposed Te Utanganui Masterplan. Area D's spatial disconnection will not promote a compact, connected, and efficient logistics hub. Given the site is not needed for expansion to Te Utanganui until 2052, further work can be undertaken in the meantime to investigate other land expansion options.	rr) Remove Area E from the Future Development Strategy. Remove Area E from the Te Utanganui Masterplan.
Remove the proposed road link between Richardsons Line and Aldersons Drive	Removing the proposed road link between Richardsons Line and Aldersons Line would provide less direct access to the Manawatū Regional	ss) Remove the 'Main Freight Road' and 'Road Intersection Design' indicated on the Te Utanganui Masterplan



	Freight Ring Road for the submitter. It would also place more transport pressure on Railway Road and El Prado Drive, which is planned for an access to Richardsons Line in the short term. The El Prado Drive to Richardsons Line road link creates less of a need for the Aldersons Drive to Richardsons Line road link but provides less direct access from industry in the North East Industrial Zone to the Manawātū Regional Freight Ring Road. We recommend the removal of the road link but note that it is a sub-optimal outcome for the wider logistics hub.	between Aldersons Drive and Richardsons Line. Update map 14 (Land Transport - roading network) accordingly.
Remove the stormwater area indicated on 703 Roberts Line	Since the Te Utanganui Masterplan was produced, the submitter has lodged a resource consent which resolves the stormwater risks that the indicative stormwater area had sought to manage. We accept the stormwater area is no longer needed.	tt) Remove the 'Stormwater Wetland Zone' associated with 703 Roberts Line from the Te Utanganui Masterplan. Update maps 13 (Stormwater network) and 23 (Open space network) accordingly.

### 13. NEXT STEPS

- 13.1 As a result of its deliberations, the Joint Steering Group will make recommendations for the finalisation of the Future Development Strategy to the Palmerston North City Council and Horizons Regional Council.
- 13.2 Officers will prepare a final draft of the Strategy based on the recommendations of the Joint Steering Group.
- 13.3 The final draft of the Palmerston North Future Development Strategy will be circulated to the Joint Steering Group prior to it being forwarded to the two councils for adoption.
- 13.4 Adoption of the final draft will be sought alongside the Councils' respective Long-term Plans (25 June 2024 for Horizons, 26 June for the City Council).
- 13.5 After adoption, an implementation plan will be prepared for the Future Development Strategy in accordance with section 3.18 of the National Policy Statement on Urban Development 2020. Like the Strategy, the implementation plan will be the joint responsibility of Palmerston North City Council and Horizons Regional Council. It must be updated annually. No consultation is required in the preparation of the implementation plan.

#### 14. COMPLIANCE AND ADMINISTRATION

Does the Working Group have delegated authority to decide?	<b>No</b>
Are the decisions significant?	<b>No</b>
If they are significant do they affect land or a body of water?	<b>No</b>
Can this decision only be made through a 10 Year Plan?	<b>No</b>
Does this decision require consultation through the Special Consultative procedure?	<b>Yes</b>
Is there funding in the current Annual Plan for these actions?	<b>No</b>
Are the recommendations inconsistent with any of Council's policies or plans?	<b>Yes</b>
The recommendations contribute to Goal 1: An Innovative and Growing City	
The recommendations contribute to the achievement of action/actions in City Growth	
The action is: Develop a Future Development Strategy	
Contribution to strategic direction and to social, economic, environmental and cultural well-being	The Future Development Strategy will contribute to the four well-beings by providing an integrated, 30-year approach to the provision of appropriate solutions for housing and business growth needs. The focus is on ensuring well-functioning urban environments, the definition of which explicitly addresses social, economic, environmental, and cultural wellbeing.

#### ATTACHMENTS

1. Recommendations Well Functioning Urban Environments Draft Future Development Strategy 2024 [↓](#) 
2. Recommendations Opportunities Draft Future Development Strategy 2024 [↓](#) 
3. Recommendations Constraints Draft Future Development Strategy 2024 [↓](#) 
4. Recommendations Growing In Draft Future Development Strategy 2024 [↓](#) 
5. Recommendations Growing Up Draft Future Development Strategy 2024 [↓](#) 
6. Recommendations Growing Out Draft Future Development Strategy 2024 [↓](#) 
7. Recommendation Infrastructure Draft Future Development Strategy 2024 [↓](#) 
8. Recommendations Other Comments Draft Future Development Strategy 2024 [↓](#) 
9. Recommendations Te Utanganui Draft Future Development Strategy 2024 [↓](#) 

## Definition of well-functioning urban environments – Officer comments and recommendations

Recommended change to the draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests a city that is easier for our Pasifika to live and thrive in	35	We acknowledge the thrust of the submission relates to larger house sizes that reflect the intergenerational living traditions of our Pasifika community. We recommend a change to one of the existing criterion to acknowledge the diversity of need that we aspire to provide for in the city.	a) Replace "Māori have the ability to express their cultural norms and traditions including papakāinga options" with " <u>Māori and other cultures have the ability to express their cultural norms and traditions</u> "
Requests reference to supporting all cultures	58, 82, 98, 114, 117, 119, 132	Rangitāne (132) recommend provision is made for other cultures to express their cultural traditions and norms under the korowai of Rangitāne. A criterion to this effect may suffice for capturing the existing provision for Māori traditions as well as other cultures. Papakāinga is already provided for under the criterion for "Māori development (including papakāinga, cultural hubs and new marae) is a readily available option", so a replacement of the Māori traditions criterion would not compromise provision for papakāinga.	

Already addressed by the current process for preparing a future development strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests easy and accessible transport links	50, 66, 100	The intent of these submissions is addressed within the existing definition, through the promotion of <a href="#">compact, orderly, safe, and connected urban spaces</a> .	No change
Requests addition of criteria related to avoiding conflict between industrial and residential uses	75		No change
Requests the removal of “active transport” from the definition to broaden the recognition of all transport modes	98		No change
Include a heading for “Resident and visitor behaviour is considerate towards other residents and visitors and caring of public areas and facilities” with criteria to support it	105		No change
Replace “There are different housing options in terms of type, location and cost” with “There will be different locations available for housing with different options in terms of type and cost in each location”	105	The intent of the submission is addressed within the existing definition and is implemented in District Plan changes through the promotion of mixed densities, broadening of minimum lot sizes, and in some cases the use of average lot sizes.	No change



Already addressed by the current process for preparing a future development strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Replace “Our urban spaces have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces” with “Our urban spaces have good provision of housing, jobs, community services, natural and open space in close proximity to where people live and that these are all accessible for all people”	105	We agree with the submitter however, we believe the intent of the submission is addressed within the existing definition: <a href="#">Moving between home, work, and recreation is straightforward and safe</a> . Having close proximity of those amenities described achieves the goal of good accessibility.	No change
Replace “Public and active transport options are safe, easy and efficient” with “Public and active transport options are safe, easy and efficient and are not compromised by parking of vehicles in public areas”	105	The intent of the submission is addressed within the existing definition, through the promotion of <a href="#">safe, easy, and efficient public and active transport</a> .	No change
Requests greater recognition of the cultural features of a well-functioning urban environment such as libraries, meeting places, and community gardens	129	The intent of the submission is addressed within the existing definition, through the promotion of <a href="#">accessible community services, natural spaces, and open spaces</a> .	No change
Supports equitable transport options	17, 91	The intent of the submissions is addressed within the existing definition, through the promotion of <a href="#">safe, easy, and efficient public and active transport options</a> , and <a href="#">compact, orderly, safe and connected urban spaces</a> .	No change

Already addressed by the current process for preparing a future development strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Supports public transport connections to central areas	4	The intent of the submission is addressed within the existing definition: <a href="#">Moving between home, work, and recreation is straightforward and safe</a>	No change
Requests that the design qualities of new development maintain a neighbourly feel. For instance, avoiding high fences and ensuring enough private amenity space.	9	The intent of the submission is addressed within the existing definition, through the promotion of <a href="#">urban design qualities that focus on the quality of life of residents.</a>	No change
Requests that the placemaking delivered to connect the river and nearby neighbourhoods is replicated across the city.	7	The intent of the submission is addressed within the existing definition, through the promotion of <a href="#">A city with a strong identity based on its own story</a> on page 20	No change
Requests provision for home occupations	49	The intent of the submission is addressed within the existing definition, through the promotion of <a href="#">a range of sites and locations for different business sectors.</a>	No change
Requests that urban design, street naming, and landscaping reflects cultural values around water and local identity	132	The intent of the submission is addressed within the existing definition, through the promotion of <a href="#">A city with a strong identity based on its own story</a> on page 20	No change

Refer submitter comment to the 2027 review of the Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the inequitable focus on the city compared to the villages	121	Acknowledged. The review of the Future Development Strategy in 2027 would provide the opportunity to incorporate better information regarding the Bunnythorpe Village Plan and Regional Freight Ring Road Indicative Business Case.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Smaller playgrounds closer to new developments will support well-functioning environments.	9	Parks provision will typically be addressed through a recreation assessment in a District Plan change.	No change
Requests protection of basic private amenities such as gardens and vegetable growing	30, 86	Consideration of private open space is currently being explored within a District Plan change for medium density housing.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests green space to look out on and access from every dwelling	82	The submitter's request limits the provision of a variety types of housing promoted under the definition of a Well-Functioning Urban Environment.	No change

Support for a focus on quality of life	30, 50, 67, 82	Noted	No change
Support for a focus on climate resilience	30	Noted	No change
Supports a focus on providing housing options that are more affordable	48, 82, 116	Noted	No change
Supports housing within a walkable distance to shops, schools, community services and parks.	4, 50, 67, 78, 116, 132	Noted	No change
Supports connection of neighbourhoods to green space.	5, 7, 17, 130	Noted	No change
<b>No treatment required</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Supports the provision of Papakāinga in the Strategy	78, 98	Noted	No change
Supports restoration of urban streams and vegetation	78, 114	Noted	No change
Supports the Iwi and Hāpu aspiration statement and Te Tiriti Principles incorporated into the definition	34, 81, 132	Noted	No change
Supports application of the Whānau Ora Framework to future growth and development	132	Noted	No change
Replace “A city that embodies Te Tiriti partnership” with “A city that embodies equal opportunity and inclusion	100	The requested change does not acknowledge our responsibility under Te Tiriti o Waitangi.	No change



Does not support the focus on reducing greenhouse gas emissions	58	Inconsistent with the strategic direction of both Councils.	No change
Opposes more efficient public and active transport links	21	Inconsistent with national policy.	No change
Replace the word “greenhouse” with “poisonous”	98	Inconsistent with the wording in the National Policy Statement on Urban Development 2020 and Horizons Proposed Plan Change 3.	No change
Replace the phrase “climate change” with “civil defence emergencies”	98	Inconsistent with the wording in the National Policy Statement on Urban Development 2020.	No change
<b>No treatment required</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Replace “We support reductions in greenhouse gas emissions” with “Greenhouse gas emissions are decreased”	105	Inconsistent with the wording in the National Policy Statement on Urban Development 2020 and Horizons Proposed Plan Change 3.	No change
Requests that all housing is close to carparking	67, 85, 87	The submitters' request is difficult to satisfy due to minimum parking requirements no longer being allowed in District Plans. The definition's promotion of urban spaces with accessibility to everyday amenities reduces the reliance on land being required for carparking.	No change
Suggests that the definition of well-functioning urban environments conflicts with	12	The District Plan provides for a range of housing locations, which has been demonstrated by the trend for a	No change

Attachment 1: Definition of well-functioning urban environments – Officer comments and recommendations

the District Plan focus on greenfield growth		relatively even mix of infill subdivision and greenfield subdivision being released to the market each year.	
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## Growth Opportunities: Submitter comments – Officer responses and recommendations

Already addressed by the current process for preparing a future development strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Suggests that the former Cloverlea Tavern site would be an opportunity for a supermarket	51	Noted. The site is currently zoned Industrial under the District Plan. PNCC is open to discussing with the landowner what the appropriate zoning of the site might be in the future. This would be more appropriate to assess at the review of the Future Development Strategy in 2027.	No change
Supports development of vacant land on Tremaine Avenue West for housing, or a reserve	Informal feedback	Noted. The site in question (Kingsgate Grove) is expected to be expected to deliver 30 homes in the short term.	No change
Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that the District Plan review rules related to side-yards and setbacks to avoid wasted space	105	A review of building location and setbacks on site will feature as part of the draft plan change for medium density housing.	No change
Every new housing development should have designated areas for communal composting and stormwater soakage	111	Minimum permeable area onsite for stormwater soakage is explored in every residential plan change. Rules related to waste storage areas will feature as part of the draft plan change for medium density housing.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests greater provision for larger homes	35, 78	There is limited scope within the levers that either Council has to encourage the development of larger homes as minimum lots sizes, multi-unit housing rules, and average lot sizes are levers that typically can enable greater diversity of housing stock toward smaller homes, rather than larger ones. We have acknowledged this challenge in the Housing and Business Needs Assessment 2023 and will continue to monitor this challenge.	No change
Requests greater provision for homes with accessibility options	78	There is limited scope within the levers that either Council has to encourage greater accessibility built into new homes, as this is managed primarily through our administration of the Building Act.	No change
Refer submitter comment to the PNCC Long Term Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests promotion of urban design competitions to co-create parks and community spaces in the city	116	Noted. This would require a Long Term Plan programme to resource the organisation of design competitions.	No change
Already addressed by other national policy statements or environmental standards			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests minimum carparking standards for new homes	98	Noted. The requirement for parking standards in District Plans were removed from the RMA as part of the Resource Management Amendment Act 2020.	No change



Out of scope			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Little consideration of land use needs for purposes other than housing and business	67	The NPS-UD requires the FDS to provide for the growth needs of the city for residential and non-residential activity (business / commercial and industrial activities). These are primarily activities requiring supporting urban infrastructure (transport, 3 waters and recreation). Development in rural areas is generally less reliant on the integrated provision and funding of infrastructure to support development.	No change
Relax restrictions on lifestyle blocks to allow for small scale land-based businesses	82	Noted. Rural residential development is already provided for in the Rural Residential Overlay of the District Plan. There is sufficient capacity within that overlay to provide for growth needs for lifestyle blocks. This is outlined further on page 72, Appendix 1 of the FDS.	No change
Encourage people to move out of dwellings that are too large for their needs to ensure that house sizes are better matched with household size	105	Noted. This is not an issue the FDS or District Plan is able to manage.	No change
Requests that the District Plan include rules to counter minimum lot size restrictions from covenants	105	Noted. Covenants are placed on land title outside of the subdivision consenting process. In this regard, the consenting process under the RMA has no control over a landowner's ability to attach a covenant to a parcel of land.	No change
Amalgamate Palmerston North City Council and Manawātū District Council	108	Out of scope	No change
Requests provisions of rent to buy homes	Informal feedback	Noted. The tenure of housing is not an issue controlled by the FDS or District Plan.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Request for an understanding of where Food HQ fits into the Strategy	30	Issue acknowledged. Open to discussing with submitter if desired.	No change
Suggests an opportunity for mode shift in the freight and logistics sector (i.e. less road freight)	55	PNITI and Te Utanganui proposals include elements which aim to support multi-modal (road, rail and air) movement of freight via the KiwiRail Regional Freight Hub, access to the airport and development of a future Regional Freight Ring Road. The Regional Land Transport Plan 2021-31 (2024 review) also provides strategic direction to encourage mode-shift in the freight and logistics sector.	No change
Requests research into the impact of low-carbon infrastructure, transport modes and food production and consumption	118, 125	Noted. This is not an issue that the FDS is able to respond to.	No change
Suggests a green belt around the city	129	Disagree. As identified in the FDS, there are a number of constraints to growth. Creation of a greenbelt around the city would create further constraints. Provision of greenspaces is part of the urban design process and regulated within the district plan.	No change
Suggests working toward a circular economy	130	Noted. This is not an issue that the FDS is able to respond to.	No change

## Constraints – Officer Comments and Recommendations

Recommended change to draft Palmerston North Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about community severance risks to Bunnythorpe from the Regional Freight Ring Road	36	Accept. A proposed business case to identify the alignment of the Regional Freight Ring Road is in years 2 and 3 of the PNCC Long Term Plan. The business case will involve a discussion with Bunnythorpe and wider community about how best to settle on an alignment that has least impact on communities. In particular, the Bunnythorpe community has raised concern about the Manawātū Regional Freight Ring Road creating physical and community severance.	b) Work with the New Zealand Transport Agency to amend Map 34 (State highway network) to highlight existing and future community severance risks.
Requests additional constraints to be considered regarding the coping capacity for the natural landscape and native ecosystems	49	Accept. We currently hold information that could assist in satisfying the submitter's request. These include landscape units assessed for the Palmerston North Landscape Inventory 2011.	c) Add a new constraint acknowledging landscapes. Include information relating to the Palmerston North Landscape Inventory 2011, bush remnants, known wetlands and significant bush areas, streams and the Tararua Range Landscape Protection Area.
Requests inclusion of natural river paths, streams, and springs as a constraint	50, 75	Accept. We currently hold information that could assist in satisfying the submitter's request. These include streams, but we note that Palmerston North does not have natural springs to factor into this constraint.	Same as (c) above

Recommended change to draft Palmerston North Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests inclusion of reverse sensitivity risks to industrial and rural activities as a constraint	50, 94, 75	Accept. Reverse sensitivity risks related to rail, state highways, and rural-residential development are acknowledged in Appendix 1, however risks associated with industries or facilities like the submitters note have not. We would recommend including a specific section related to reverse sensitivity as a constraint in Appendix 1, which should be broadened to capture other sites worth acknowledging. We are confident that this would not impact our current preferred growth option, as any possible reverse sensitivity effects would be assessed within a District Plan change.	d) Add a new constraint within Appendix 1 to reflect sites and activities across the district that are anticipated to have reverse sensitivity risks to manage.
Requests changes in the FDS to differentiate between the national and local power network.	65	Accept	e) Amend text to the effect of Transpower's submission relating to being more specific about national grid infrastructure.
Recognise the national gas network as a constraint	Raised in hearings	Accept. We note the national gas network had not featured in the draft FDS but do not consider this to be material to the consideration of growth areas. Avoidance measures can be considered in the rezoning process.	f) Add the national gas network to the National Grid section of Appendix 1 and Map 36.



Recommended change to draft Palmerston North Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that the FDS is clearer about reverse sensitivity effects on the national grid	65	Accept.	g) Amend text to the effect of Transpower's submission relating to being more specific about reverse sensitivity effects on the National Grid
Market-led approaches are considered a constraint to achieving diverse housing design and tenure needed to develop local communities	78	Accept. We recommend including text under page 72 of Appendix 1 to reflect the limitations that Council's role in housing and business growth has in meeting broader outcomes.	h) Add a new constraint to Appendix 1 as follows: <b><u>"Council's influence over the market</u></b> <u>Key levers that Councils have in influencing community outcomes for housing and business growth are limited in their scope. Our communities of interest have told us in the Housing and Business Needs Assessment 2023 that there is are limited options for inter-generational living, accessible housing, and larger homes. These options either don't represent projected household sizes that our market is driven to</u>

			<p>cater for, or represent possible increased costs to construction that reduce a developer's ability to remain market-competitive. Diverse housing tenure models and sustainable construction are areas of interest to our community, but there is limited scope for our District Plan, Development Contributions Policy, and our administration of the Building Act to be able to encourage or require these outcomes.</p>
Requests consideration of our solid waste capacity as a constraint	82	Accept. Solid waste is a constraint to all growth in the district but is not considered a location-specific factor for deciding on options for meeting demand for housing and business land.	<p>i) Add a new constraint to Appendix 1 as follows:  <u>"Landfill capacity</u>  <u>Bony Glenn landfill in Turakina services the district's solid waste needs. Bony Glenn is currently project to hold a projected 25-30 years' worth of solid waste. Risks to this projected landfill capacity include:</u></p>

			<ul style="list-style-type: none"> <li>• <u>Growth in districts serviced by Bony Glenn (Whanganui, Taranaki, Ruapehu, Rangitikei, Manawatū, Kapiti, Horowhenua and Wairarapa)</u></li> <li>• <u>Future changes to recyclables</u></li> <li>• <u>Reducing capacity for special types of waste in Wellington and Hawkes Bay regions, such as asbestos and contaminated soil</u></li> </ul> <p><u>Through PNCC's Asset Management Plans, we would investigate securing contracts with landfills further afield as Bony Glenn gets close to capacity."</u></p>
Requests that private developer agreements be acknowledged as a way of funding growth for Kākatangiata earlier than the	83	Accept. Developer agreements have already been referred to on page 71 but we acknowledge their role in expediting infrastructure delivery has not been made clear enough in the Strategy.	<p>j) Amend text on page 71 as follows: "In addition, these changes do not prevent developers lodging private plan change</p>

medium term			applications <u>or entering into developer agreements to enable</u> development sooner than we have scheduled the funding to support growth.”
Requests consideration of the constrained funding environment for transport	84	Accept. We recommend including this consideration as new text under page 71.	Add text to page 71 as follows: k) “ <u>Funding for transport changes in the State Highway network anticipated for growth is significantly constrained. Funding commitments can change to adjust to national priorities. We need a variety of land-use, structure plan, staging, and local funding options to hedge against this risk. This risk is more acute in our greenfield areas than our existing urban environment. The business case process can assist in demonstrating value for money compared to other competing interests in the National Land Transport Fund.</u> ”
Requests acknowledgement of the business case process for expediting outcomes in the Strategy	84		



Recommended change to draft Palmerston North Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that wording is changed for the flood prone areas constraint to provide for engineering solutions where appropriate	88	We recommend including changes to the text in the Flood Prone Areas section of Appendix 1 to reflect further investigation required on appropriate flood risk responses in Te Utanganui.	l) Amend text on page 78 as follows: “Kākātangiata and Te Utanganui will address the risk posed by the flood prone areas <del>through</del> <u>by seeking to avoiding</u> development within them. <u>Some areas within the Te Utanganui area require further flood risk assessment to understand whether appropriate avoidance or mitigation measures can be put in place to enable these to be developed.</u> ”
Acknowledge opportunities for site-based stormwater management and upstream benefits from the KiwiRail Hub and other developments in the stormwater ponding constraint	88	The relief sought is already addressed in the current text where it is signalled that stormwater needs to be carefully managed in greenfield growth areas. However, it is noted that the notified version of the FDS incorrectly refers to Map 30 as the 200-year model showing stormwater depths. This submitter has correctly identified this as Map 28.	m) Change reference to Map 30 on page 73, to Map 28. No other changes recommended

Recommended change to draft Palmerston North Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests an acknowledgement of the role of aggregate and quarrying to Palmerston North's future development and protect aggregate resources from alternative land uses or access constraints	96	We don't anticipate the identified growth areas in the Future Development Strategy to conflict with the aggregate locations identified by the submitter. Officers are open to further conversation about informing the next Future Development Strategy review in 2027. We recommend including further text under Geographical and Physical Constraints on page 72 to recognise the need for local aggregate supplies to support growth.	n) Add the following text to Geographical and Other Physical Constraints on page 72: <u>"Aggregate is an essential resource for the construction of housing and business areas. Projected housing demand in the district equates to demand for 103,000 tonnes of aggregates per year. Because of the high travel costs associated with aggregates, consideration of local aggregate resources when planning urban growth is important."</u>

Already within the Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that the long-term costs of low-density greenfield growth are emphasised more as a constraint	1	Noted. These are addressed on page 86.	No change
Concern about the affordability of growth infrastructure	55, 58, 59, 64, 70, 82, 92, 98, 100, 105, 114, 115, 116, 117, 119, 140	Noted. This concern is addressed by page 71.	No change
Requests acknowledgement of stormwater risk on lifeline routes such as state highways	84	Noted. The reference to the risk of stormwater damaging infrastructure on page 73 satisfies this request.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that further work is undertaken to understand and address the stormwater constraint particularly for the urban area	79	The submitter's request is currently being investigated as part of preparation of Draft Plan Change I: Medium Density Residential Zone.  PNCC are also in the early stages of developing a city-wide stormwater strategy to guide priorities for how best to manage stormwater in the future.	No change
Requests clarity on how limited access roads have factored into the identification of growth areas	84	Limited access roads are considered a constraint factored into transport assessments in relevant District Plan changes for growth areas. The impact of growth areas on limited access roads and vice versa is explored in a District Plan change and the appropriate structure plan, District Plan, or transport network response is negotiated through the plan change process.	No change
Requests that the wording in the FDS on page 73 is amended to avoid the phrase 'development not recommended'	79	The phrasing is prudent in light of current information available. We expect that further refinement of our position will occur once a stormwater strategy for the city and/or a stormwater servicing assessment has been completed for Draft Plan Change I: Medium Density is completed.	No change
Include traffic flows as a constraint to manage	56, 58, 74, 91, 97, 111, 112, 116, 133	The impact of additional transport effects on the current levels of service of roads affected by a growth area is assessed at a District Plan change.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Protect our established trees and heritage buildings	130	Noted. Section 17 of the District Plan manages these issues. These constraints are often factored in at a site-specific level and we would not expect these to hold a significant bearing on overall growth decisions.	No change
Requests greater emphasis on flood prone areas as a constraint	16, 18, 27, 34, 117, 128	Noted. The flood prone areas in Appendix 1 indicate which areas need further investigation into flood risk. This investigation is explored at the District Plan change level. Any preclusion of areas identified at this plan change would be reflected in subsequent Future Development Strategies.	No change
Consideration of wind as a constraint to liveability in some locations	Informal feedback	Noted. We do not consider wind to hold significant bearing overall growth decisions.	No change
Concern about the accuracy of stormwater modelling to inform greenfield growth areas	Informal feedback	Noted. PNCC largely rely on flood modelling from HRC. This source is the best available information to base decisions on future greenfield growth at this time.	No change
Has concerns about liquefaction risk across the district	16, 26, 34, 122	Noted. The liquefaction risk areas in Appendix 1 indicate which areas need further investigation in liquefaction risk. This investigation is explored at the District Plan change level. Any preclusion of areas identified at this plan change would be reflected in subsequent Future Development Strategies.	No change



Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that constraints are reinvestigated regularly	12, 121	Noted. The District Plan change process provides this opportunity as does the 3-year review of the FDS.	No change
Refer to Horizons Regional Council			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the accuracy of highly productive land information	Informal feedback	Horizons will be required to notify a Regional Plan change by September 2025 to give effect to the National Policy Statement on Highly Productive Land. This Regional Plan change will map highly productive land in greater detail.	No change
Waterway pollution and soil erosion risks from forestry and roading is a constraint to manage	32	Noted. The One Plan manages these risks through the consenting process.	No change

Request for more detail from Horizons on the approach to prioritise the allocation of drinking water for future growth above economic needs	132	Acknowledged. Allocation of water for municipal supply is regulated by the One Plan and the Resource Management Act. When considering applications to abstract water, the Consents Team also assess the activity for consistency with the NPS for Freshwater Management 2020, which introduces the hierarchy of obligations around freshwater management. We currently understand that groundwater supply in the City is not at risk of overconsumption but will undertake further work in the review of the Future Development Strategy in 2026 to understand this fully and enrich the Water Supply section.	No change.
<b>Refer to the Vegetation Framework review</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Requests that canopy cover is acknowledged in the Strategy	82	Noted. The Citywide Vegetation Framework is currently being reviewed. Results from that analysis may be used to inform the Future Development Strategy review in 2027.	No change
Urban heat island effect is a constraint with increased development	30	Noted. The Citywide Vegetation Framework is currently being reviewed. Results from that analysis may be used to inform the Future Development Strategy review in 2027.	No change

Responsibility of other agencies			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consider risks to the power grid from newer technologies such as electric vehicles and artificial intelligence	112	Noted. The resilience of the electricity network is the responsibility of Powerco. Their planned upgrades in their 2024 Asset Management Plan anticipates changes in electrification and emerging technologies.	No change
Concern that a lack of competition for airlines using the airport will price out people from accessing the city	82	Noted. PNCC and Horizons do not have powers to control competition in airline services.	No change
Request to consider the vulnerability of our telecommunications network to power cuts and cyber attacks	34	The resilience of the telecommunications network is the responsibility of Chorus.	No change
Responsibility of other agencies			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that constraints to 5G cell phone towers in proximity to the airport are included	56, 58, 59, 60, 64, 74, 91, 97, 111, 115, 117, 127, 133	Effects on airport operations are often managed by the Civil Aviation Authority, particularly using a Part 77 Assessment of Objects and Activities Affecting Navigable Airspace.	No change.

Out of scope			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that skills shortages are considered a constraint	99	Noted. This would be considered a national constraint that may feature in economic forecasts.	No change
Consider weather as a constraint to achieving active and public transport outcomes	111	Noted. Weather, topography, and safety are all considered factors for public and active transport and are considerations when designing specific projects.	No change
Considers that bylaws, District Plan controls and plan change processes are considered as constraints to growth	12, 107	Noted. The Future Development Strategy would influence the review of these levers for development.	No change
Concern about the risks to our water supply from climate change	82	Climate change risks to water supply are a citywide issue and are not necessarily specific to growth locations. These risks are better addressed through PNCC's Asst Management Plans.	No change

Addressed through resource consent processes			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern that flood modelling undertaken for Kikiwhenua and Kākātangiata growth areas will be out of date with changes to climate change predictions	118, 125	Noted. The requirement for a stormwater management plan at the point of subdivision allows for updated rain forecasts to be factored in.	No change
Requests a consent condition to manage reverse sensitivity effects on the state highway network from properties within 100m of the state highway network that are not already subject to state highway noise rules	84	Noted. This is an issue for the consenting process not the FDS. PNCC are open to discussing where this noise issue may need to be further managed by the District Plan.	No change
Highly productive land is an important constraint	7, 67, 108, 118, 121, 125, 130	Horizons will be required to notify a Plan change by September 2025 to give effect to the NPS-HPL. This Plan Change will map highly productive land in better detail.	No change



No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests inclusion of local road network as a constraint	50	Local road network is not critical to the network at a citywide scale.	No change
Request to combine state highway information from pages 88-89 with page 58	84	We can acknowledge the submitter's request to have all state highway information in one place, however we recommend keeping the constraints and infrastructure sections clearly separated for ease of reference.	No change
Requests greater consideration of the state highway network as a constraint	122	Page 88 and map 34 outline the constraints associated with the state highway network	No change
Requests that maintenance and future proofing of existing infrastructure is considered a constraint	99	Maintenance and future proofing of existing infrastructure is addressed in Asset Management Plans as part of the development of the LTP.	No change
Concern about whether there are any feasible growth options that can be carbon-neutral	118, 125	Acknowledged.	No change
Consider Māori land as a constraint to development	129	There is no Māori land within the district as a constraint to growth.	No change

## Growing In – Officer Comments and Recommendations

Recommended change to draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about reverse sensitivity effects if Massey land were to be repurposed for housing	94	Accept. Mapping possible reverse sensitivity sites in the FDS will assist in informing investigations and engagement in future rezoning processes.	o) Map Ag Research site as a reverse sensitivity site.
Already addressed by the current process for preparing a future development strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Opportunities for underutilised land and buildings in the city centre	5, 29, 30, 32, 56, 58, 64, 67, 69, 70, 74, 82, 85, 87, 91, 92, 105, 111, 117, 124, 132	Noted. The District Plan (DP) allows residential development in the Inner, Outer and Local Business Zones. It is acknowledged the DP's business zones need to be reviewed so that rules enabling residential development are fit for purpose.	No change
Support for mixed use in the city centre	Informal feedback	Noted. The District Plan allows for mixed use development. See comment above regarding the need to review the DP.	No change
Support for mixed use or multi-unit development in the Outer Business Zone	informal feedback	Noted. The District Plan's Outer Business Zones allows mixed use and multiunit development. See comment above regarding the need to review the DP.	No change

Already addressed by the current process for preparing a future development strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Supports redevelopment of the old post office site	13, 117	Noted. The site has been bought by a developer and is actively seeking a resource consent for redevelopment.	No change
Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Sufficient capacity in the existing Residential Zone	50, 53	Growing in areas provide greater benefits than just meeting housing demand. Some of these areas resolve heavy traffic conflict, reverse sensitivity effects, and create a more efficient use for vacant land.	No change
Concern about poor urban design outcomes	50, 56, 58, 67, 117, 127	Noted. RMA plan changes providing for all development types contain urban design assessments that recommend development rules seeking to deliver positive design outcomes for the city.	No change
Impact of development on the urban heat island effect	30	Noted. The Citywide Vegetation Framework is currently being reviewed. Results from that analysis may be used to inform the Future Development Strategy review in 2027.	No change
Discourage land banking	1, 12, 23, 68	Noted. We can monitor the risk of landbanking over time through the Housing and Business Needs Assessment to adjust our housing and business bottoms lines to	No change

		encourage further competition in the land market.	
Prioritise development within the existing urban environments before expanding greenfield growth	1, 129	Noted. We are prioritising a number of District Plan changes within the existing urban environment to satisfy this request. Particularly medium density housing and Roxburgh Crescent Residential Area.	No change
Concern about city centre living crowding out business growth needs	82, 105	Noted. We would monitor this risk over time in the Housing and Business Needs Assessment every three years to inform our next review of the Business Zones. Currently there is sufficient development capacity in our business zones to cater for growth.	No change

Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consider Iwi land for housing	34	Noted. We would anticipate that Rangitāne o Manawātū Settlement Trust would consider housing for land that they control. Any Rangitāne-owned land that is suitable for housing is already enabled for that land-use in the District Plan.	No change
Concern about impact of areas not anticipated by the Palmerston North Integrated Transport Initiative	84	Noted. We would expect that this would form part of the work either to inform early investigations into rezoning or in the implementation plan to inform PNITI. At this stage we anticipate these sites to align with the outcomes in PNITI. Most of these sites are within the medium to long term range so there is time to explore these further.	No change
Concern about repurposing land that could otherwise support stormwater detention	132	The majority of land proposed for repurposing is in the medium-long term. It is anticipated that a stormwater strategy is prepared in time to inform the review of the Future Development Strategy in 2027. This would assist in testing whether our current approach to repurposing land continues to remain appropriate whole or part.	No change



The extent doesn't go far enough	29	Noted. PNCC will monitoring housing and business growth for the next Housing and Business Needs Assessment to keep track of whether the Future Development Strategy has the balance of housing locations right.	No change
<b>Refer submitter comment to the 2027 review of the Future Development Strategy</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Redevelop Coronation Park as a transit-oriented housing development	73	No direction from Council has been sought to look at this site for repurposing and it currently serves an important citywide recreation need for sport. We recommend that we consider it in the preparation of the review of the FDS in 2027.	No change
Consider reducing some reserves in size to provide for housing e.g. Campbell Reserve and reserves in Milson	86	This option has not been considered as it would affect levels of services for parks in those neighbourhoods. No direction from Council has been sought to look at these sites for repurposing. We recommend that we consider it in the preparation of the review of the FDS in 2027.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Preservation of and greater need for greenspaces	4, 7, 24, 32, 49, 50, 55, 56, 59, 64, 74, 82, 92, 97, 99, 100, 105, 111, 113, 115, 119, 124, 127, informal feedback	RMA plan change processes assess the need for open green space, both in the form of parks / reserves and private open greenspace. Any requirement for additional public open green space feeds into PNCC's Asset Management Plans, programmes are developed and then considered as part of the LTP.	No change
Increased pressure on services	26, 27, 52, 56, 58, 59, 74, 85, 97, 99, 111, 113, 119, 133, informal feedback	The RMA plan change process requires an assessment of the extent to which existing infrastructure networks have capacity to support growth. If not, then an assessment is made of how additional capacity is to be provided. These recommendations feed into PNCC's Asset Management Plans, programmes are developed, considered as part of the LTP and included in PNCC's Development Contributions Policy.	No change

Natural hazard risk for locations close to the river	6, 27	Flood risk assessments and liquefaction assessments would determine the appropriateness of development in locations near the river, and what mitigation or infrastructure measures are required to provide for safe new communities. This is done at the District Plan change stage.	No change
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Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Infill subdivision is becoming increasingly harder to develop	28, 85	A programme to progress a rolling review of the District Plan has started. This will include a review of the subdivision section.	No change
Neighbours end up living too close to each other	26, 41, 56, 58, 64, 86, 97, 111, 115, 119, 142	Noted. RMA plan changes enabling residential development will look at developing rules to manage overlooking, noise and privacy of living areas.	No change
Noise effects	59, 61, 74, 111, 115, 119, 127, 133	Through the RMA rezoning process an acoustic assessment will guide the formulation of noise standards.	No change
Pollution effects	59, 61, 111, 115, 127, 133	Environmental effects will be examined through the RMA rezoning process.	No change
Not supportive of medium/high density for growing in	8, 13, 70, 82, 91, 112, 113, 143	Noted. The merits of housing choice and density can be more appropriately assessed alongside environmental effects such as shading, privacy, stormwater, landscape, and transport effects, in a RMA rezoning process.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the redevelopment of the Hokowhitu Lagoon Residential Area	50	Noted. This area has been through the RMA rezoning process which examines the suitability for development based on a package of technical evidence examined by independent RMA accredited hearings commissioners.	No change
Concern about infill subdivision diminishing the tradition of large sections	55, 85	Noted. There is a recognition in the National Policy Statement on Urban Development that urban environments are expected to change over time. This will be tested along with our need to provide for housing choice in the market in a RMA rezoning process. We would anticipate that lower density still has a role to play in meeting market preferences, but acknowledge that an oversaturation of low density homes in the market has promoted housing affordability and housing security risks nationally and locally.	No change
Concern about growing in being worse for climate change	56	We would anticipate that growing in creates an efficient use of existing infrastructure and urban land through the concept of highest and best use. We anticipate this to support relative reductions in emissions.	No change



Concern about the cost of upgrading services being more expensive than building new infrastructure in new areas	56	Noted. The cost of infrastructure upgrades is considered in the Long Term Plan and servicing assessments in a RMA rezoning process. This would influence our recommendations regarding whether we proceed with individual growth areas or not.	No change
Concern about whether growing in areas have sufficient access to community facilities, parks, and shops	56, 67, 111	Proximity to parks, public transport, and public amenities are assessed in both urban design and transport assessments that inform RMA rezoning processes.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about Roxburgh Crescent not aligning with proposed criteria for the medium density zone	82	The plan change being developed to provide for residential development at Roxburgh Crescent will include an option for medium density development if landowners wish to develop in this way. This provides for housing choice to promote a range of community needs. The merits of this approach can be explored once Roxburgh Crescent is notified for public submissions.	No change
Concern about the effect of higher density in Roxburgh Crescent on the openness of the river park	82	The plan change being developed to provide for residential development at Roxburgh Crescent is developing rules that balance the need for reasonable development potential with the needs of the wider environment including managing effects on residential neighbours and openness to the river.	No change
Opportunities for terraced housing	7	Every current District Plan change has provided an opportunity to explore proportions of medium density housing within them, including terraced housing.	No change
Increased travel times by reducing business areas in local neighbourhoods	50, 105	Transport assessments and future Housing and Business Needs Assessments would inform District Plan changes to ensure that we are not undermining the value of business land in those locations but taking them away.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the effect on community identity	99	Landscape and urban design assessments at the District Plan change stage take into account the existing residential environment.	No change
Concern about increased antisocial behaviour/crime	50, 55, 56, 59, 61, 74, 91, 111, 115, 117, 127, 133	This concern is not an issue that can be addressed through the FDS. Planning standards through the RMA rezoning process can look at crime prevention through environmental design when developing land use rules.	No change
Request to undertake a stormwater opportunities assessment and engage with Rangitāne prior to considering reserves repurposing such as Huia St Reserve and 17 Summerhays Street	132	Noted. The decisions regarding Huia Street and Summerhays Streets for housing have already been confirmed through Council. The stormwater opportunities for these two sites can be explored as part of the rezoning process for medium density. A future stormwater strategy would inform any other sites in the future, such as Albert Street Depot.	No change
Refer to the review of the Palmerston North Integrated Transport Initiative			
Submission Theme	Sub no.	Officer Response	Officer Recommendation

Requests better integration of commuter and freight transport networks and anticipated growth areas	122	PNCC's strategic transport model is currently being completed and will assist business case processes in exploring the integration of this network.	No change
<b>Responsibility of other agencies</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
More community housing	33	Social housing is primarily the responsibility of Kāinga Ora – Homes and Communities.	No change

Out of scope			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Social housing developed in standalone areas or in the city centre	85	PNCC and Horizons do not have the power to determine where social housing can be developed.	No change
Amalgamate the Palmerston North Airport within Ohakea Airbase to free up land for housing	105	PNCC and Horizons do not control the development of Ohakea Airbase.	No change
No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consider the proposed Awapuni library site for housing	70	This action has been through a special consultative procedure for the future use of that site.	No change
Repurpose large carparking areas for housing, such as Toyota and Foodstuffs on Roberts Line	105	Reverse sensitivity effects for these sites would preclude repurposing.	No change
Supports growing in on the former Carters site on Rangitikei Street	129	This site is already within the growing in extent.	No change



No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Invest in the Railway Land as a public space or repurpose it	19	The Railway Land has not been considered as an opportunity to be repurposed due to its value as a reserve, and likely to support the draft medium density zone with access to parks.	No change
Requests that the Albert Street Depot is not repurposed	50, 82	The submitters' primary concern is related to accessibility to central parts of town for civil works vehicles from the depot and central access to the recycling drop-off centre. The effects on operations at the depot would be considered prior to the decision to shift the Albert Street Depot.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Remove the Ashhurst growth areas from the growing out extent	132	The submitter's concerns primarily relate to flood risk for that growth area. Due to flood and stormwater risks that are still being explored, we have pushed out the Ashhurst Growth Areas into the medium term. We would recommend that the Ashhurst Growth Areas remain in the FDS until technical assessments have been completed and optioneering on mitigation and avoidance measures have been fully canvassed.	No change
Support for Albert Street Depot being repurposed for housing and green space	105, 132	Noted.	No change
Requests redevelopment of vacant commercial areas (e.g. Rangitikei Street and Tremaine Avenue)	85, 86	These areas are included in the growing in extent in the FDS.	No change

## Growing Up – Officer Comments and Recommendations

Already addressed by the current process for preparing a future development strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Supports enabling growing up in the Schnell Drive area	105	Noted. Schnell Drive is within the growing up extent in the FDS.	No change
Support for multi-unit development at the fringe of the city centre	Informal feedback	Noted. Multi-unit housing areas are in the District Plan for these locations and will be considered for medium density housing in an upcoming District Plan change.	No change

Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about impact of areas not anticipated by the Palmerston North Integrated Transport Initiative	84	Noted. The plan change currently being developed by PNCC to provide for a Medium Density Residential Zone under the National Policy Statement on Urban Development is planning to run a number of development scenarios through PNCC's transport model. The output of this modelling is expected to identify impacts on the transport network and where investment will be required. These outputs will feed into PNCC's Asset Management Plans, growth programmes will be developed and considered by the 2028 LTP. Ultimately these programmes will feed into PNCC's Development Contributions Policy.	No change
Impacts on emergency service response times	32	Noted. The plan change currently being developed by PNCC to provide for a Medium Density Residential Zone under the National Policy Statement on Urban Development will consult with emergency service providers. The transport implications of Growing Up will be assessed through this plan change.	No change

Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern that the absence of a stormwater strategy discounts the growing up option too prematurely	101	Noted. PNCC is in the early stages of developing a Stormwater Strategy to inform the priorities for investment in a stormwater response for the city over the long-term. The plan change currently being developed by PNCC to provide for a Medium Density Residential Zone (MDRZ) has undertaken a stormwater assessment that has modelled the impacts that increased density over time may have on flood risk in the identified zone. This information is informing the extent of land being identified for MDRZ for the city.	No change
Prioritise increased density over standard infill subdivision and greenfield growth	12	Noted. PNCC is prioritising the preparation of a Medium Density Zone which would satisfy the submitter's request.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Higher density is not suitable for meeting everyone's needs	34, 87, 92, 97, 129	Noted. Medium density is proposed under Draft Plan Change I to enable a range of options for housing, but not require exclusively medium density housing the zone. The market will respond to residential preferences.	No change
Height-related effects such as sunlight and privacy for neighbours	17, 24, 30, 45, 50, 51, 58, 59, 68, 69, 70, 74, 86, 87, 92, 98, 115, 117, 119, 123, 133, 136, 137, 141, 143	Noted. Any RMA plan change process providing for medium-density development is required to manage issues such access to sunlight, overlooking and effects on residential amenity and character.	No change
Neighbours living too close to each other	24, 26, 55, 56, 58, 59, 87, 92, 97, 99, 115, 119, 127	Noted. See comments above.	No change
Natural hazard risk for taller buildings	27, 52, 133	Noted. Geotechnical risks are likely to be assessed in the rezoning process for medium density.	No change



Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
The extent and height limits don't go far enough	29, 105	Noted. The proposed MDRZ will have to balance the extent to which it enables density in parts of the city while ensuring effects such as shading, overlooking and impacts on residential character and amenity are appropriately managed.	No change
Impact on existing character and heritage	8, 51, 56, 98, 115, 123	Noted. Any RMA plan change process providing for medium-density development is required to manage effects on residential amenity and heritage.	No change
Reduced private outdoor space	56, 64, 78, 87, 91, 92, 98, 99, 112, 116, 119, 133, 143	Noted. Any RMA plan change process providing for medium-density development is required to manage effects associated with overlooking of neighbours.	No change
800m distance to a shopping centre is considered too far for a return trip	86, 87	Noted. The walkability rationale for a Medium Density Zone will be explored through a District Plan Change and will be open for submissions to challenge any rationale that is proposed.	No change
Noise effects	64, 87, 111, 115, 127	Through the RMA rezoning process an acoustic assessment will guide the formulation of noise standards.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about network infrastructure capacity	2, 26, 52, 56, 64, 73, 74, 78, 87, 91, 92, 105, 112, 115, 116, 119	Noted. RMA plan change processes require technical assessments examining the capacity of existing network infrastructure to support additional development and how additional capacity will be provided if and when needed.	No change
Concern about whether growing up areas have sufficient access to community facilities, schools, parks, and shops	56, 105, 115, 129	PNCC is currently developing a plan change to provide for a Medium Density Residential Zone under the National Policy Statement on Urban Development. The proposed zone has been based on walkable catchments to schools, public transport, parks, and local business centres.	No change
Concern about the quality of development	4, 30, 86, 122, 142	Noted. Planning standards will be put in place so that good quality urban design outcomes are achieved.	No change
Confine medium density to the city centre or greenfield growth areas	85, 86, 113	Noted. The National Policy Statement on Urban Development requires all options to be considered when examining where medium density development can be enabled.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests a stepped approach to residential height limits depending on proximity to the city centre	105	Noted. The submitter's request is better explored at in the rezoning process for medium density housing, as it relates to specific planning controls.	No change
Cap the number of units per infill development to 12	111	Noted. These types of issues can be examined as part of the review of the Residential and Subdivision Sections of the District Plan	No change
Concern about the quality of medium density development	Informal feedback	Noted. Planning standards will be put in place so that good quality urban design outcomes are achieved when PNCC develops its plan change to provide for medium density development.	No change
Requests priority toward enabling growth in the Highbury/Takaro/Awapuni area	132	Noted. The draft Medium Density Residential Zone currently being prepared will explore the viability of medium density in these locations.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the effects that medium density will have on the character of some neighbourhoods	Informal feedback	Noted. Noted. Planning standards will be put in place so that good quality urban design outcomes are achieved for neighbourhoods.	No change
Refer to the PNCC LTP			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Remove/reduce development contributions if eco-friendly elements are built into housing developments	111	Consider in next Development Contribution Policy update.	No change
Out of scope			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the cost of construction	50	Noted. Market forces will determine which of the density options enabled through the District Plan will be developed within these areas	No change
Risk of clusters of small homes becoming exclusive spaces for rentals or social housing	78, 100	Neither PNCC or Horizons can control the tenure of housing.	No change

Already addressed by other national policy statements or environmental standards			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Increased fire risk	34, 112, 133	Fire protection is administered through the Building Act.	No change
No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Supports Highbury and Roslyn being included in growing up	34, 91	Noted.	No change
Support for growing up subject to infrastructure capacity	Informal feedback	Noted. All RMA plan changes to rezone land will include technical assessments examining the ability of infrastructure to provide for growth and the necessary investment in capacity required in the future.	No change
Concern about the poor precedent set from Australian cities	Informal feedback	Noted.	No change
Support for growing up to make space for more green space	Informal feedback	Noted. RMA plan change processes assess the need for open green space, both in the form of parks / reserves and private open greenspace. Any requirement for additional public open green space feeds into PNCC's Asset Management Plans, programmes are developed and then considered as part of the LTP.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests the mandatory planting of street trees in new developments	9, 129, 132	PNCC's Engineering Standards for Land Development address the issue of street trees in new developments.	No change
Remove Kelvin Grove and Milson from the growing up extent due to increasing demands for cell phone towers creating risk to the airport	111, 127	Cell phone towers are managed through the National Environmental Standards for Telecommunication Facilities and with respect to airport activities, Part 77 of the Civil Aviation Act rules. We anticipate that there are sufficient controls in place in Kelvin Grove and Milson to avoid enabling growth that cannot be serviced by telecommunication infrastructure.	No change
Identify key areas within the existing urban environment to be prioritised for housing delivery	79	The District Plan provides the planning framework to enable housing development. However, it is up to the market as to where and how housing is developed.	No change
Concern about quality of life, social and mental health effects	52, 67, 78, 92, 97, 105, 111, 112, 114, 115, 117, 127, 142	Noted. We would anticipate that the design standards set for the draft Medium Density Zone would enable well-functioning urban environments.	No change



No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Pollution effects	64, 111, 115, 127	Environmental effects such as pollution will be examined through the RMA rezoning process	No change
Pressure on carparking	19, 24, 74, 111, 115, 117	We would anticipate that the advantage of medium density and infill subdivision in logical locations near local amenities would reduce car dependency. Monitoring of levels of service for transport infrastructure would occur as this type of development grows over time. Changes to roads and infrastructure to support better mode shift would be scheduled into the Long Term Plan accordingly.	No change
Concern about this option increasing car dependency	49	<p>Compact urban growth reduces car dependency and enables people to choose sustainable mobility such as walking and cycling.</p> <p>PNCC is currently developing a plan change to provide for a Medium Density Residential Zone under the National Policy Statement on Urban Development. The proposed zone has been based on walkable catchments to schools, public transport, parks and local business centres.</p>	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
The risk of private market alternatives (private plan changes) is overstated and can be managed by Council	101	Noted.	No change
Supports development of land within the Airport Zone for business	55, 106	Noted. The Airport Environs Precinct is provided for in the future growth maps in the FDS as growing up, so this acknowledgement is provided for. The Core Airport Precinct has not been included as the restrictions on the type of businesses that could be consented to operate within that precinct make it difficult to predict the role of the precinct on future development.	No change
Requests clarity on why some parts of the existing urban environment have been excluded	79, 122	The market driver analysis under Appendix 4 assessed which existing areas were likely to experience housing growth in the next 30 years and estimated the locations likely to grow in the short, medium and long term. The existing residential areas excluded from our growing up extent are because we don't expect growth to occur at any material level in the city over this period.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Supports growing up at Longburn	122, 129	Noted.	No change
Support for Iwi involvement in how medium density can be provided in Palmerston North	Informal feedback	Noted.	No change
Supports inclusion of Rangitikei Street and Tremaine Avenue for further development	85	Noted	No change
Requests medium density development around the railway station	73	Noted. PNCC is working with KiwiRail to investigate the future use options for their land when operations are relocated to the Rail Freight Hub at Railway Road.	No change
Requests clarity on why some parts of the existing urban environment have been excluded	79, 122	The market driver analysis under Appendix 4 assessed which existing areas were likely to experience housing growth in the next 30 years and estimated the locations likely to grow in the short, medium and long term. The existing residential areas excluded from our growing up extent are because we don't expect growth to occur at any material level in the city over this period.	No change

Requests clarity on what parts of growing up are expected to be enabled for medium density	79, 82	Map 45 shows where we are currently explored the draft Medium Density Zone.	No change
Requests clarity on which parts of growing up may be prioritised for growth in the short, medium, and long term	79	Whilst we have estimated where growth may be experienced in existing residential areas in the short, medium, and long term (Appendix 4), it is up to the market once the zone is enabled. Levels of service for infrastructure will be monitored over time and upgrades will be scheduled into the Long Term Plan accordingly.	No change

## Growing Out – Officer Comments and Recommendations

Recommended change to draft Palmerston North Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Request for 160 Napier Road to be included in the extent of growing out	80, 103, 104, 129, 132	The proposed 160 Napier Road site has merit for residential use, however, faces highly productive land and stormwater constraints that are yet to have been fully assessed through a private plan change. We recommend that the site be included in the Future Development Strategy, but as a medium term growth area to reflect the uncertainty about the highly productive land and stormwater constraints. The applicant would have to demonstrate that the tests in the National Policy Statement for Highly Productive Land can be met in order to justify rezoning productive land. Inclusion in the Future Development Strategy does not make these tests and easier or harder to meet.	p) Add 160 Napier Road into the Future Development Strategy as a medium-term growing out residential area.

Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Prioritise development within existing urban environments before growing out	1, 6, 7, 73, 105, 129	Noted. The FDS recommends a balanced approach. We are prioritising the preparation of a medium density zone and will monitor its impact on development through the Housing and Business Needs Assessment.	No change
Re-evaluate the proportion of greenfield development provided for in light of the climate crisis, National Policy Statement on Urban Development, and development costs	101	Noted. The FDS notes that affordability constraints associated with delivering infrastructure to support greenfield development is likely to slow down the extent to which the city relies on the growing out option in the medium to long term. In this regard, it is likely the city will have to rely more heavily on the grow up and in option. The NPS-UD does however require PNCC to provide options for growth including greenfield development.	No change
Requests that greenfield areas are released slowly to control servicing costs	69	Noted. See the reference to affordability above.	No change



Refer submitter comment to the 2027 review of the Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Preference toward growth at Bunnythorpe as an alternative to Aokautere due to planned job growth at Te Utanganui.	53	Noted. PNCC intends to initiate a conversation with the Bunnythorpe community once the indicative business case determining the final alignment of the Regional Freight Ring Road is complete. This discussion will be focused on where residential growth may be best located in Bunnythorpe in the future.	No change
Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Places pressure on existing network and community infrastructure.	6, 12, 68, 117	Noted. All RMA plan changes to rezone land will include technical assessments examining the ability of infrastructure to provide for growth and the necessary investment in capacity required in the future.	No change
Retention of highly productive land	6, 32, 55, 62, 67, 70, 73, 78, 82, 86, 101, 111, 113, 129, 136, 142, 143	Highly productive soils are a constraint on development as are issues such as flooding, erosion, airport approach and take-off surfaces and stormwater. Any plan change proposing to rezone land for urban development will need to be tested against the National Policy Statement for Highly Productive Land.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Request for a buffer to be required next to the Gasworks Drain in the 160 Napier Road proposal	132	Specific controls like this are better considered in the private plan change process for 160 Napier Road	No change
New developments are less attractive	9, 49	Noted. Design matters are explored at the District Plan change stage where submitters are able to challenge the urban design qualities promoted through the District Plan.	No change
Too much focus on standalone dwellings and not enough on townhouses and apartments	29	Noted. The balanced approach includes the option of growing up and providing for medium density development. PNCC are in the process of developing a plan change under the National Policy Statement on Urban Development to provide a Medium Density Residential Zone for the city.	No change
Supports growing out if the public transport network is reliable	8	Noted. Provision for a road layout and hierarchy that can support extensions to the public transport network at the District Plan change stage.	No change
Concern around natural hazard risk such as flood prone areas, land stability and liquefaction	16, 27, 34, 54, 55, 82, 115, 118, 125, 133	Noted. All RMA plan changes to rezone land will include technical assessments examining natural hazard risk and whether the hazard can be appropriately managed.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Supports growing out if it includes protecting green spaces and enhances public transport, schools, and local shopping centres	17, 50, 56, 73, 91, 99, 133	Noted. We usually expect these to be considered for residential growth areas at the District Plan stage. For instance, Kākātangiata has four new shopping centres proposed, and Aokautere has one new shopping centre proposed. For business growth areas, we expect to provide good accessibility and connectivity to these locations from residential areas.	No change
Concern about East-West sprawl and it being a series of suburbs rather than a well-connected city	19	Noted. All RMA plan change processes to rezone land consider the extent to which new residential areas provides connectivity to the existing urban form of the city.	No change
Concern about the amount of infrastructure required for Kākātangiata north of the rail line	19	Noted. The FDS notes affordability constraints associated with providing new greenfield growth areas with supporting infrastructure is a challenge. It is likely the city will have to rely more heavily on providing for growth within the existing urban area and slow down the extent to which greenfield development is provided for.	No change
Transport issues in relation to car-dependency, carparking needs, and unresolved pre-existing transport issues	26, 49, 78, 97, 101 105, 112	Noted. These are assessed in a transport assessment at the District Plan change stage.	No change

Involve landowners in the consideration of state highway noise setbacks for Kākātangiata	83	The RMA rezoning process provides and opportunity for this for Kākātangiata.	Nio change
<b>Refer submitter comment to the relevant plan change process</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Reduces the practicality of active transport use	105	Noted. This is assessed in a transport assessment at the District Plan change stage and can be modelled through the PNCC transport model. The updated model includes consideration of active transport modes.	No change
Concern about the cost burden and viability of providing growth infrastructure	13, 50, 99, 101, 105, 117, 140	Noted. The FDS recognises affordability constraints associated with providing supporting infrastructure, particularly for large greenfield areas such as Kākātangiata. The cost of growth infrastructure is recovered through the Development Contributions Policy.	No change
Concern about protecting national grid assets that exist within the Kākātangiata, Aokautere, and Braeburn Industrial Areas	65	Noted. Any plan change seeking to rezone land at Kākātangiata or development on already zoned land at Aokautere or Braeburn will need to protect the ongoing operational capability of the national grid network and associated plant and equipment.	No change

Concern about the limitations of noise setbacks on development	83	Noted. All RMA plan changes to rezone land will include an acoustic assessment to ensure noise rules and required setbacks, where appropriate, are in place to manage the effects of development.	No change
<b>Refer submitter comment to the relevant plan change process</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Risks of deforestation	32	Noted. Landscape and ecological assessments for District Plan changes usually assess effects on existing canopies and can recommend protection of significant areas or offsets and enhancements. In the majority of our chosen growing out locations, existing bush blocks have been identified and earmarked for protection, or are associated with existing stream or wetland areas that are unsuitable for development.	No change
Concern about the growth of retirement villages that aren't in proximity to community facilities such as on Napier Road	129	Noted. The Aokautere urban growth area demonstrates where the District Plan can direct retirement village development to locations adjacent to local amenities.	No change

Consideration of higher density in greenfield growth areas	30, 68, 99, 113	Recent greenfield plan changes to provide land for residential development at Mātangi and Aokautere have included rules allowing for medium density. It is likely that planned development at Kākātangiata will also have rules providing for increased density, accompanied with access to local amenities.	No change
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Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Protect the Manderson Bush block in the Kākātangiata growth area	51	The draft structure plan for Kākātangiata (Figure 22) provides for the protection and enhancement of the Manderson Bush Block.	No change
Supports inclusion of the Braeburn Industrial Area in our growing out extent	75	Noted. This is currently being explored in the rezoning for Kākātangiata.	No change
Supports the inclusion of the existing Race Training Zone in the growing out extent	76	Noted. Further transport and stormwater assessments will confirm the staging of infrastructure for Kākātangiata and take into account the co-location advantages of the zone with planned infrastructure to service Kikiwhenua.	No change
Requests greater clarity on the spatial location of medium and long term growth stages within Kākātangiata and Aokautere.	81	Noted. The spatial location of medium and long term growth stages in Kākātangiata will ultimately be determined by the motivation and priorities of landowners and developers to meet the market. Figure 2 in the FDS, growth capacity and locations in the short, medium, and long term, is indicative in nature and based what is known at present. The picture around timing and location of medium and long term growth at Kākātangiata is constantly changing and is likely to be different when the FDS is reviewed in 3 years.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Retain a single side of streams and rivers to provide for floodways to protect existing residents	118, 125	Flood risk assessments would determine whether this is appropriate in certain circumstances at the District Plan change stage.	No change
Suggests greater consideration of industrial growth at Longburn alternatively to residential	122	The Kākātangiata growth area would factor in the Housing and Business Needs Assessment to confirm the demand that needs to be met. The City West growth area has been signalled for residential growth for a number of urban growth studies over decades. See Appendix 6.	No change
Requests to bring the timing forward for the Ashhurst growth areas into the short term	135	Noted. Flood and stormwater constraints create too much uncertainty about the viability of the Ashhurst growth areas to place in the short term.	No change
Some interest in rural-residential subdivision toward the west of Bunnythorpe	Informal feedback	The consideration of future residential growth in this location is signalled in the Te Utanganui Master Plan for the medium term for Bunnythorpe. We do not yet have enough of an understanding of the constraints to the village to know what is possible.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the road connection in the Aokautere Structure Plan between the potential retirement village and Silicon Way	Informal feedback	Noted. This issue relates to Plan Change: G, rezoning of additional land at Aokautere. At this moment a decision on the plan change is pending. Independent Commissioners are currently examining this issue.	No change
Refer to the PNCC Long Term Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Central government support for financing growth infrastructure	50	Noted. PNCC is investigating how Crown Infrastructure Partners through the Funding and Financing Act (2020) can provide an external funding mechanism to fund and finance infrastructure investment required to support growth.	No change
Requests that a second bridge across the river is developed before expanding the city further	11	Noted. The National Policy Statement on Urban Development requires us to assess and provide for projected demand in housing and business land. A business case to confirm the location of the Manawātū Regional Freight Ring Road is proposed in the PNCC LTP to expedite the process of securing a second bridge across the river. This may impact on our next Future Development Strategy review in 2027.	No change

Responsibility of other agencies			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern that no schools are being projected for future growing out areas will increase commute times, stretch existing teaching resources and lead to poorer community outcomes	82	Noted. PNCC are actively discussing growth planned for the city with the Ministry of Education to ensure that access to schooling is provided for new neighbourhoods.	No change
No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Increase the scoring of the growing out scenario for accessibility to jobs, community spaces etc to acknowledge the holistic planning that structure plans provide to this objective	83	Noted. The change in scoring would be unlikely to changes the outcome towards supporting only greenfield growth in the future, so we recommend no change.	No change
Requests acknowledgement of the growth areas that were already identified prior to the National Policy Statement for Highly Productive Land being in effect	83	This is acknowledged on page 86 of the FDS.	No change
Land adjacent to the city should be reserved for parks rather than urban sprawl	101	The submitter's request does not assist in meeting demand for housing and business land.	No change
Suggests greater consideration of growth on Ashhurst Road	122	We would expect growth to be planned for at Ashhurst and Bunnythorpe prior to requiring the need for further growth at Ashhurst Road itself.	No change

Supports housing growth at Bunnythorpe and Ashhurst to make local business more viable	133	Noted. The FDS identifies the need for housing at Bunnythorpe and Ashhurst.	No change
Request to provide for more rural-residential subdivision	Informal feedback	Rural-residential subdivision is provided for in the Rural Residential Overlay. The review of the Rural Zone as part of the rolling review of the District Plan will examine the sufficiency of land for rural-residential development alongside broader strategic issues and constraints.	No change
Concern about the retention of highly productive land	Informal feedback	Noted. Any RMA plan change seeking to rezone land for urban development must meet tests under the National Policy Statement for Highly Productive Land. These tests examine the need for housing or business land in that particular location and market and that the least amount of land is taken up to meet that need.	No change
Concern that the scenario assessment for growing out doesn't acknowledge the variability in natural hazard risk across sites	83	Noted. The FDS provides extensive information identifying constraints including natural hazards. It is acknowledged the nature of hazard risk is different across all identified growth areas. However, until detailed technical assessment is undertaken of hazard risk at the plan change stage it will not be known if a natural hazard is a fatal flaw to development or whether its effects can be appropriately managed / mitigated.	No change

Interest in how the regional freight ring road will restrict residential growth on the western portion of Kākātangiata	Informal feedback	Noted. It is acknowledged by PNCC that further discussion is needed with NZTA to ensure proposed residential development at Kākātangiata is provided for in a way that does not undermine the outcomes sought by PNITI.	No change
Business land closer to the edges of the city as an alternative to the centres-based approach to our business zones	2	Noted. The District Plan has a hierarchy of business zones, with the Inner Business Zone (City Centre) being atop the hierarchy. This resource management approach remains sound. Greenfield growth areas on the edges of the city will provide local business centres to service the day to day needs of the surrounding residential catchment.	No change
Risk of devaluing neighbouring properties	32	We acknowledge the concern. However, the RMA process to rezone land does not allow effects on property values to be considered apart from ensuring appropriate land use controls are in place to manage adverse environmental effects.	No change
Concern about greenfield growth increasing carbon emissions	101, 105	Noted. The impact of growth areas on carbon emissions can be assessed at the plan change stage.	No change
Preference toward growth at Kākātangiata	52, 83, 107, 132	Noted. Given the infrastructure constraints to Kākātangiata, this growth area in anticipated in the medium and long term.	No change

Consideration of growth east of SH57 between Linton and Forest Hill Road	66	Noted. Variations of this extent have been assessed in urban growth studies between 1978 and 2012. The only area that has been preferred has been Summerhill Drive and later the Aokautere Urban Growth Area, due to its proximity to the Fitzherbert Bridge. Other locations further afield will continue to be discounted until a second bridge across the river is confirmed.	No change
Prioritise greenfield growth toward Turitea/Aokautere area	67	Noted. Plan Change: G, Aokautere, proposes rezoning land for an additional 1000 houses. At this point in time the plan change is awaiting a decision from Independent RMA Commissioners.	No change



Attachment 6: Growing out – Officer comments and recommendations

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## Infrastructure – Officer Comments and Recommendations

Recommended changes to draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests a correction to the Schools map to acknowledge that the Manukura School site is now open and operating	81	Accept	q) Amend Map 24 to change the Manukura school site from 'future school' to 'high school'
Requests clarity on the reference to revoking SH3	84	Accept	r) Amend text on page 58 as follows: Once the new freight route is operational, <u>we will explore the advantages of revoking the existing state highway status of State Highway 3 will be revoked and eventually become more of managing Rangitikei Line as a local road in nature.</u>

Recommended changes to draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Re commendation
Requests clarity on how Te Ahu a Turanga and Ōtaki to North of Levin will influence future growth	84	Accept	s) Add the following text to Page 13: <u>“Te Ahu a Turanga and Ōtaki to North of Levin will result in more efficient freight movements into and out of Palmerston North, encouraging the utilisation of the city's future industrial land use. Alongside this it could encourage more people to commute into Palmerston North from the East and South, as well as Commuters from Palmerston North south towards Wellington.”</u>
Identify Rangitāne aspirations for a kura-a-iwi in the school infrastructure section	132	Accept. We recommend including text in the Schools infrastructure section of the FDS to satisfy this request. Because no locations were specifically mentioned, we are assuming this aspiration is not currently tied to any particular sites.	t) Add text on page 64 as below: <u>“Rangitāne aspire to plan and develop kura-a-iwi (schools with localised curriculum based on iwi values) and grow the number of opportunities for tamariki o Rangitāne and tamariki Māori in Palmerston North.”</u>
Requests that the labelling of State Highway			u) Amend the key on Map 22 to

Improvement maps are amended to be consistent with language in the Palmerston North Integrated Transport Initiative	84	Accept	rename "Potential New Road-Alternative Southern Bridge Location" to "New Road Sub Option"
			v) Amend the key on Map 22 to rename "Potential Road Upgrade" to "Road Upgrade Sub Option"
Lack of assessment into whether we will reach our future water supply limit in the District.	118, 125	The constraints associated with water supply and growth are identified in the FDS. At the present time, it is understood that water is available within the Manawātū Groundwater Management Zone. This will be assessed further as individual plan changes for growth areas progress.	w) Amend the text on page 40 as follows: "New bores will be required to support growth. Indicative locations for the bores are shown in Map 11. <u>At the present time, we understand that there is water available for abstraction within the Manawātū Groundwater Management Zone.</u> Demand for groundwater associated with the growth areas is not yet fully known, nor the impacts of the bores on groundwater users and groundwater fed waterbodies."
Request to update National Grid assets on the National Grid map	65	Accept.	x) Update the National Grid map in Section E, page 93, to reflect the map in submission 65.

Requests separate references between the national grid and local electricity network in the introduction of Section E	65	Accept. The change assists in distinguishing between local and national networks.	<p>y) Add text to page 38 as follows: “Additional infrastructure is:</p> <ul style="list-style-type: none"> <li>• land transport not controlled by Horizons Regional Council or Palmerston North City Council such as the State Highway network</li> <li>• public open spaces, including city-wide and local reserves</li> <li>• community infrastructure</li> <li>• schools,</li> <li>• healthcare facilities</li> <li>• telecommunications network, <del>and</del></li> <li>• <u>the National Grid,</u></li> <li>• <u>local</u> electricity and gas networks <u>and</u></li> <li>• <u>flood protection infrastructure”</u></li> </ul> <p>z) Add a new paragraph at the end of page 38 as follows: <u>“Flood protection is an important element of supporting urban growth. Horizons Regional Council’s 30-</u></p>
Requests that flood protection structures are moved to the Additional Infrastructure section of the Strategy, and clarity on infrastructure funding expectations for growth areas that rely on upgrades to this infrastructure.	18	Accept. In the National Policy Statement on Urban Development definitions, flood protection infrastructure is not included in either ‘development infrastructure’ or ‘additional infrastructure’. However, given the important role flood protection plays in the city, inclusion of this as part of our definition for Additional Infrastructure is considered appropriate.	

<p>Requests the addition of the following text under National Grid (92):</p> <p>Transpower’s Transmission Planning Report 2023 identifies that the Central North Island regional peak demand is forecast to grow by an average of 3% per annum over the next 15 years – this is greater than the national average growth rate of 2% per annum. Note that this is a regional forecast for the entire central North Island and not specific to the grid exit points that service demand in the Palmerston North City</p>		<p>Accept</p>	<div data-bbox="1532 280 1980 624"> <p><u>year Infrastructure Strategy and draft 2024 Long-term Plan identifies planned flood protection works for the City over the course of this Strategy. Flood protection levels and any future improvements will likely influence the timing of growth for the city.”</u></p> </div> <div data-bbox="1532 624 1980 783"> <p>aa) Move Flood Protection Structures on pages 80-81 to the Additional Infrastructure section under Section E.</p> </div> <div data-bbox="1532 783 1980 1294"> <p>bb) Include the following text on page 92:</p> <p><u>“Transpower’s Transmission Planning Report 2023 identifies that the Central North Island regional peak demand is forecast to grow by an average of 3% per annum over the next 15 years – this is greater than the national average growth rate of 2% per annum. Note that this is a regional forecast for the entire central North Island and not specific to the grid exit points that</u></p> </div>
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jurisdiction. As at 2024, Transpower does not anticipate that any additional work on the National Grid will be required (over and above its existing plans) to address electricity supply constraints arising from growth planned under the FDS.			<u>service demand in the Palmerston North City jurisdiction. As at 2024, Transpower does not anticipate that any additional work on the National Grid will be required (over and above its existing plans) to address electricity supply constraints arising from growth planned under the FDS.”</u>
<p>Requests more detail on how the Strategy intends to resolve gaps in flood protection infrastructure.</p> <p>Page 78 needs to provide additional context to explain that the following map (map 29) shows flood-prone areas based on a xx-size event and that should a larger event occur in these areas that the flooded area may be larger</p>	18	Accept. Recommend text changes to page 80 and inclusion of a footnote to Maps 29 and 30 reference to data sources for the flood modelling information.	<p>cc) Amend text on Page 80 as follows:</p> <p>“These stopbanks provide protection from the Manawatū River, the Mangaone Stream and the Ashhurst Stream. The city stopbank network was upgraded to 1 in 500-year protection plus 600mm freeboard (room for uncertainty) following the 2004 floods, while the Ashhurst Stream stopbank provides 1 in 100-year protection plus 300mm freeboard. <u>Some areas we have identified for future growth (for example Ashhurst),</u></p>



			<p>are not included for investigation, scoping, increasing, or building of flood protection in Horizons' Infrastructure Strategy for the next 30 years. As such there are currently no plans for new stopbank development within the city boundary. Horizons Infrastructure Strategy identifies minor works planned that relate to increasing the resilience of the network rather than increasing the current level of flood protection. <del>Also,</del> <del>Given there are no plans for new or upgraded stopbank development this may be a constraint to our growth,</del> particularly in Ashhurst where we know some of the growth areas require a stopbank upgrade. To address this constraint, both Councils, landowners, the community and infrastructure providers</p>
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			<p><u>will need to work together to establish ways of addressing these constraints (for example access to alternative funding). In some cases, these growth areas need to be reconsidered in future versions of this strategy.</u></p> <p>Rules in the Regional Plan prevent development (particularly intensification) in close proximity to the protection structures, which growth will need to take into account. <del>Also, given there are no plans for new or upgraded stopbank development this may be a constraint to our growth, particularly in Ashhurst where we know some of the growth areas require a stopbank upgrade"</del></p> <p><u>Flood protection structures do not guarantee that communities are safe from floods that exceed the protection level indicated on Map 30, so flood risk is never eliminated. Increasing severity</u></p>
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			<u>and frequency of rainfall events due to climate change is likely to diminish the expected protection levels of the stopbanks in future years.</u>
Page 38 refers to “our Infrastructure Strategy”. Recommend that this more clearly reflects that this a reference to PNCC’s Infrastructure Strategy and Long-term Plan	18	Accept and check the rest of the document.	dd) Change reference on page 38 as follows: <del>Our</del> <u>Palmerston North City Council’s</u> Infrastructure Strategy and draft 2024 Long Term Plan has scheduled funding of development infrastructure in particular years. The timing when growth areas will be infrastructure-ready is broadly shown in <i>Figure 2</i> , page 25.
Lack of assessment into land suitability for wastewater discharges onto land	118, 125	Accept. The Nature Calls project has assessed land suitability for wastewater discharge and the study area is available online (pncc.govt.nz/Council/What-were-doing/Ongoing-projects-and-programmes/Nature-Calls/Nature-Calls-update). We recommend that we amend map 12 to reflect this spatially.	ee) Amend Map 12, page 43, to include the area of interest for land discharge for Nature Calls.  ff) Add the following text to page 42: <u>“The area of interest for land suitable to discharge treated wastewater for Nature Calls is shown on Map 12. The requirement for land for Nature Calls has the potential</u>

			to conflict with latter stages of Kākātangiata, which we would expect to explore further along with any potential reverse sensitivity effects in a wastewater servicing assessment in a District Plan change.”
<b>Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Requests clarity in the Strategy of the funding status of infrastructure for each growth area once the Long Term Plan is confirmed	79, 84	We anticipate as part of annual reviews of the Future Development Strategy Implementation Plan that we would track the progress of development infrastructure to enable growth areas.	No change
Requests further information on transport assumptions for the Strategy and what transport infrastructure is required that may differ from the Palmerston North Integrated Transport Initiative programme	84	We anticipate as part of annual reviews of the Future Development Strategy Implementation Plan that we would track the progress of development infrastructure to enable growth areas. As part of this exercise, we can be clear about what infrastructure is anticipated under the Palmerston Integrated Transport Initiative. It is noted the	No change

		<p>Te Utanganui Master Plan was developed in partnership with NZTA and alignment with PNITI was a critical consideration. Plan changes providing for urban growth in locations with an interface with the State Highway network have been developed in consultation with NZTA (Whakarongo, Napier Road Residential Area, Aokautere and Kikiwhenua). In this regard, these growth areas have been developed to align with PNITI as much as possible. PNCC acknowledges further discussion with NZTA is needed with respect to the future extent of Kākatangiata and its alignment with PNITI.</p>	
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Refer submitter comment to the 2027 review of the Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Include future community facilities identified in the Long Term Plan into the infrastructure section	132	The FDS will be adopted before these facilities are confirmed in the LTP. Refer to next FDS review to incorporate.	No change
A greater emphasis on protecting emergency service response times should be provided	74, 91, 111	Further engagement with emergency service providers is required to understand key emergency service routes in the city. We recommend reviewing the influence that these routes may have on future development in the review of the Future Development Strategy in 2027.	No change
Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Does not believe that public transport needs to be a prime consideration for every development	100	We anticipate that provision for public transport is investigated in a transport assessment where relevant in a District Plan change.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the social impact of infrastructure changes to the quality of life for Bunnythorpe residents	121	The impact on Bunnythorpe residents of the proposed Regional Freight Ring Road will be considered when PNCC undertakes a business case process that looks at finalising the road corridor alignment. Impacts on residents associated with rezoning proposals will be considered as part of the RMA process. Rules will be developed to manage noise, stormwater, traffic and visual amenity effects of development.	No change
Requests that access across the railway is considered a key transport issue when planning new growth areas	109	We anticipate the consideration of options for how best to facilitate access at railway crossings will form part of a transport assessment where relevant in the development of a District Plan change.	No change
Requests that we better develop out street tree network and roadside bioretention devices in new roading projects	132	These are best assessed for suitability at the rezoning stage for new growth areas. We note that there are existing provisions in the Engineering Standards for Land Development for street trees and bioretention devices.	No change





Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the implications of details about infrastructure in areas yet to have servicing assessments completed	Informal feedback	All plan change processes to rezone land will have servicing assessments evaluating capacity of existing networks and where capacity needs to be provided to respond growth. These assessments will inform the development of growth programmes for the next LTP.	No change
Request that greenfield growth areas are specified to require offline shared path networks	132	This is better addressed in a transport assessment in a rezoning process to determine suitability and need.	No change
Refer to the PNCC LTP			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consider the relationship between school infrastructure and transport infrastructure	128	The submitter's request is related to the active transport behaviour change programme in the PNCC Long-Term Plan.	No change
Requests an expansion to our ecological network similar to the success from Green Corridors	17	This submission is related to the level of service provided for the Green Corridors Programme in the PNCC Long Term Plan.	No change

Request to include opportunities for infill areas to be supported with transport upgrades to the same standard for active transport as greenfield areas	132	This is a roading level of service matter best addressed the the PNCC LTP and Asset Management Plans.	No change
<b>Refer to Horizons</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Requests an independent review of the adequacy of our flood protection network	27	Noted and refer to Horizons.	No change

Refer to the Palmerston North Integrated Transport Initiative			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consider the future need for light rail or tram systems	123	The FDS does not preclude consideration of other public transport options. Provision of public transport is guided through the Regional Public Transport Plan.	No change
Requests clarity on the indicative new road toward Feilding on Map 22	89	The new indicative road connecting to Feilding was identified in PNITI as a part of the Manawatu Regional Freight Ring Road. The indicative road would be the Eastern Bypass allowing more efficient movement between Te Utanganui and Feilding. This road will be explored more as a part of the Indicative business case. Outside of the Future Development Strategy, we recommend that officers work further with Manawātū District Council on the Manawātū Regional Freight Ring Road to the Kawakawa Industrial Park	No change
Prioritise revision of the limited access road status of SH56	83	This section of SH56 is within the scope of PNITI.	No change

Responsibility of other agencies			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Suggests a greater emphasis on investment in rail and charging road freight for infrastructure costs	55	Responsibility sits with KiwiRail and the New Zealand Transport Agency.	No change
Requests greater passenger rail options; frequencies	3, 41, 74, 78, 92, 99, 129, 143	The Capital Connection and passenger rail is operated by KiwiRail who jointly with the Horizons and Greater Wellington Regional Councils have been working on securing investment for a new fleet with greater frequency. The Regional Land Transport Plan and Horizons Regional Public Transport Plan provide the strategic direction and guide investment in public transport (including rail). We would expect that the Future Development Strategy would assist in their future planning for passenger rail in the district.	No change
Concern about additional growth if health facilities are currently under pressure	4, 19, 41, 82, informal feedback	Te Whatu Ora are primarily responsible for health services. We would expect that the Future Development Strategy would assist in their future forecasting of health service provision in the region.	No change

Out of scope			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests encouragement of high water-using businesses to use roof water collection and water recycling to reduce supply on the piped network	116	The submitter's request is too granular for consideration under a high-level strategic document.	No change
Already addressed by other national policy statements or environmental standards			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about 5G cell phone towers	58, 74, 111, 119, 127	The deployment of telecommunications infrastructure is controlled by the National Environmental Standards for Telecommunications Facilities 2016.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern that short-term improvements in the Palmerston North Integrated Transport Initiative are too presumptive in advance of the Regional Freight Ring Road route being confirmed	36	Map 20: Short term state highway improvements is drawn from the Palmerston North Integrated Transport Initiative Network Options Report. We recommend maintaining consistency with this information. We acknowledge the submitter's concern and would expect that the Regional Freight Ring Road Indicative Business Case process would identify whether these short-term improvements remain appropriate.	No change
Requests clearer information of each growth infrastructure programme to be tabulated and identified as essential or optional infrastructure	55	The submitter's request is addressed in the PNCC Long Term Plan. All infrastructure to support growth in the future is identified in PNCC's Development Contributions Policy. The granular nature of the request is not well aligned to the city-wide strategic focus of the FDS.	No change
Requests clarity with how networks identified in maps 16 to 18 will support a well-functioning urban environment and how these relate to growth areas identified in the Strategy	84	Information on Maps 16 to 18 relating to infrastructure in our growth areas is drawn from transport assessments and structure plans from District Plan changes. We will update these accordingly as District Plan changes	No change



		progress. Timing for the delivery of these networks would be provided for in the Long Term Plan (Asset Management Plans, Infrastructure Strategy and Development Contributions Policy). We would expect that the provision of public and active transport options that are safe, easy and efficient would be assessed at the District Plan change stage.	
Requests clarity on the Feilding to Palmerston North Shared Path	89	We can confirm for the submitter that the map reference is the Feilding to Palmerston North Shared Pathway.	No change
Requests a preference for green infrastructure to be acknowledged in the stormwater infrastructure section	132	The submitter's request is satisfied by the existing text in on page 44 referring to "As part of delivering well-functioning urban environments, we have said we need to work with, not against, the natural characteristics of our location to promote community and environmental wellbeing. For stormwater, this may look like restoring urban streams and nature-based stormwater management where possible."	No change
Requests a reference to using locally sourced vegetation in the stormwater infrastructure section on page 45	132	Noted. We recommend that this is considered in the stormwater strategy	No change

Requests that the FDS identifies new stormwater reserves that are likely to be needed under the proposed stormwater strategy.	first before incorporating into the FDS in the 2027 review.	
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## Other Comments – Officer Comments and Recommendations

Recommended change to the Draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that the Palmerston North Integrated Transport Initiative is acknowledged in Figure 1	84	Accept. We recommend including reference to the Palmerston North Integrated Transport Initiative as it is not currently captured under national or local government direction in this document.	ff) Include reference to the Palmerston North Integrated Transport Initiative in Figure 1.
Requests that the importance and degree of alignment of the Palmerston North Integrated Transport Initiative is clarified in the Strategy	84	Accept. Including reference of PNITI to Figure 1 will demonstrate its importance to growth in the city. The growth areas are aligned with anticipated growth under PNITI. Smaller pockets of industrial areas indicated for future repurposing strengthen the consolidation of freight transport under PNITI.	
Update maps to better show the extent of Bunnythorpe	36, 122	Accept. We acknowledge the extent used to represent Bunnythorpe in the FDS (extent of residential, industrial and business zoned land) makes it difficult to discern the Bunnythorpe community at the scale that the FDS maps are shown. We recommend replacing the extent with the Stats NZ extent of Bunnythorpe.	gg) Update the base-map underlying all the maps in the Strategy to include the Stats NZ extent of Bunnythorpe.

Recommended change to the Draft Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests greater acknowledgement of how surrounding districts influence our Future Development Strategy	82, 84, 85, 89, 100, 108, 122	This is already partially addressed by pages 11 and 36. There is scope to draw reference to recently adopted or planned growth strategies for other districts.	hh) Include the following text onto page 36: <u>Some of our neighbouring districts have recently completed their own projections and growth strategies. These include Rangitikei District Council's Community Spatial Plan, and Tararua District Council's Urban Growth Strategy. Manawatū District also has plans for an urban development framework to identify new growth areas. As these districts assess how much capacity they have to cater for housing and business demand, we will be able to better understand possible additional pressures on our district.</u>
Requests that the funding status of required infrastructure and its timing for delivery could be incorporated into the FDS and	79	The final nature of growth programmes feeding into the Development Contributions Policy will not be known until the PNCC LTP	ii) Include the following text onto page 14:

subsequent Implementation Plan		is finalised. Given the FDS is required to be approved before final adoption of the LTP it is not possible to have the funding status of required infrastructure and its timing for delivery in the FDS. However, a note can be placed in the FDS pointing to the schedule of assets in the Development Contributions Policy that describes the infrastructure programmes in place to support growth.	<u>Note: the schedule of assets for which development contributions will be used to fund growth is contained in the PNCC 2024 Development Contributions Policy (pages 73-78).</u>
Requests involvement of Ngāti Kauwhata when making decisions regarding Bunnythorpe	128	Acknowledged. Engagement with Ngāti Kauwhata leaders was undertaken in the preparation of the Te Utanganui Masterplan and Future Development Strategy and we expect this to continue regarding matters surrounding Bunnythorpe. We expect to include engagement with Ngāti Kauwhata on Te Utanganui and Bunnythorpe-related actions in the Future Development Strategy Implementation Plan.	No change
Requests early involvement of Rangitāne o Manawatū around decisions on future growth and housing	132	Accept. We expect to include consultation with Rangitāne o Manawatū on growth-related plan changes in the Future Development Strategy Implementation Plan.	No change

Already addressed by the current process for preparing the Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Is concerned about the risks of population and local economic forecasts changing	7, 11, 19, 58, 91, 105, 114, 116, 122	The Future Development Strategy will be reviewed every three years. The Strategy will be updated in accordance with the latest population and economic forecasts available at the time of review.	No change
Concern about the accuracy of a 30-year forecast plan	26, 142		No change
Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
There is a lack of industrial and commercial land for the 500-1500m2 footprint range	23	Noted. PNCC’s Housing and Business Needs Assessment notes an adequate supply of business / commercial land is in place over the short to long term. However, vacancy levels in the city’s industrial zones are at 1% and additional land is required. The review of the Industrial Zone section of the District Plan will respond to this issue.	No change

Recommended change to the Draft Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests a reduction in projected infill supply estimates to 300-350 and increase greenfield supply estimates to 700-750	28	Noted. PNCC is facing fiscal constraints around the extent to which funds can be borrowed to extend infrastructure in support greenfield development. This affordability constraint may mean the city needs to rely less on the greenfield option. The city may instead need to look at pivoting towards providing for growth within the existing urban area where the cost of supporting infrastructure is more affordable.	No change
Increase the projected housing bottom lines by 10% to hedge risk in infill undersupply	28	Noted	No change
Concern that projected short term housing supply is too optimistic	80, 107	Noted	No change
Concern that projected infill capacity is overstated	107	Noted	No change
Increases to online learning at Massey University will have a big impact on the city's employment numbers	30, 82	Noted	No change
Requests that housing supply is targeted to increase rent affordability as well as housing affordability	78	Noted. Not an issue able to be addressed by the FDS.	No change

Recommended change to the Draft Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Support for a stormwater management strategy and/or improved stormwater evidence	79, 83, 100, 101, 132	The preparation of an evidence-based city-wide stormwater strategy will be included in the implementation plan for the Future Development Strategy.	No change
Concern that freeing up of rail-adjacent industry next to the Tremaine Avenue railyards when the KiwiRail Hub is developed has not been assessed	122	Noted	No change
Request to use transport modelling to strengthen the Strategy	84	Noted. PNCC are open to applying the model when the FDS is reviewed, subject to time and resourcing.	No change
Requests involvement in the development of the Implementation Plan	79, 81, 84, 89	Noted.	No change
Refer submitter comment to the 2027 review of the Future Development Strategy			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern relating to consultation such as lengthy documents, weekend closing dates, overlapping consultations, and lack of independent peer review	82, 85, 86, 87, 100, 111, 122	Noted. This will be considered during consultation planning for the future review of the Strategy and other planning processes.	No change



Concern about the scenario assessment methodology, such as lack of weighting for each of the criteria, relatively similar criteria in some cases, optimism bias for some scoring and asymmetry of the score range	83, 118, 125	Noted. Officers can consider this as part of the review of the Future Development Strategy in 2027. We do not expect the scenario assessment risks raised to have a material impact on the extent or timing of growth areas as our timing of growth and rezoning priorities is in favour of growing in and growing out.	No change
Requests that a future visioning exercise to identify likely changes in society in 2030, 2050, and beyond would be beneficial	118, 125	Noted. Officers can consider this as part of engagement on the review of the Future Development Strategy in 2027.	No change
Impact of the region on the wider NZ economy should be referenced	31	Noted. Officers can consider this in the next Housing and Business Needs Assessment or review of the Future Development Strategy in 2027	No change
Requests more engagement with the community	7, 34, 85, 98, 100	Noted. This will be considered during consultation planning for the future review of the Strategy and other planning processes.	No change
<b>Refer submitter comment to the 2027 review of the Future Development Strategy</b>			
<b>Submission Theme</b>	<b>Sub no.</b>	<b>Officer Response</b>	<b>Officer Recommendation</b>
Requests further consideration of expected transport modes in the future	49	Noted. We are in the process of updating our strategic transport model, which in conjunction with our citywide carbon model, may assist in future reviews of the Strategy.	No change
<b>Already addressed by other national policy statements or environmental standards</b>			

Submission Theme	Sub no.	Officer Response	Officer Recommendation
Disagrees with the focus on 'growth'	82, 142	The National Policy Statement on Urban Development requires Tier 2 Councils assess demand and supply for housing and business land and provide for this demand through a Future Development Strategy. There are no provisions in national direction to ignore growth pressures.	No change
Request to amend Figure 1 to add reference to the National Policy Statement on Electricity Transmission Activities	65	Figure 1 already addressed National Policy Statements under the reference of "National Direction"	No change
Notes that the Albert Street Depot is missing from the annotations on the growth maps in Section D	82	The Albert Street Depot is reflected as a Repurposed Industrial Pocket adjacent to 17 Summerhays Street on the map.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Notes inconsistency between the growth timing tables in the Statement of Proposal and the Strategy (591 homes in Kākatangiata from 2030 in the Statement of Proposal c.f. from 2032 in the Strategy)	83	Acknowledged. The Future Development Strategy document has the correct year.	No change
Requests clarification on the risks of oversupply of land from areas identified above and beyond those assessed in the Housing and Business Needs Assessment 2023	84	We would expect to interrogate these further in the next Housing and Business Needs Assessment, as the majority of these additional growth opportunities sit outside the short-term growth period.	No change
Requests reference to the 2024 Regional Land Transport Plan, State Highway Improvements Plan and Government Policy Statement on Land Transport	84	These are all generally captured under National Direction in Figure 1. The draft FDS used the current RLTP at the time. We can assess alignment with the 2024 RLTP in the FDS Implementation Plan.	No change
Requests consideration of how the ageing population will affect housing demand	87	The Housing and Business Needs Assessment 2023 highlighted that the ageing population in driving demand for smaller homes in the district. This has been reflected in our preferred growth approach for enabling smaller homes in areas close to local amenities.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern that language used in the document is too presumptive in advance of future processes needed to confirm some projects or growth areas	121	The FDS states that this strategy informs other processes and acknowledges the subsequent processes required to confirm any growth directions.	No change
Concern that the projected 55% bottom line for greenfield housing has not been adjusted since recognition of climate change and housing crises	101	We acknowledge that the housing bottom lines have remained relatively similar over previous periods. Priority has however been given to the timing of work to rezone land for medium density housing and some of the growing in areas. We will continue to monitor the impact of plan improvements to enabling medium density development.	No change
Demand is flexible and more driven by cost and availability rather than specific preference for location	105	We are required by the National Policy Statement on Urban Development to assess and provide for housing in different locations and we agree that a variety of locations provides for different market preferences.	No change
Requests clarity on the rationale for 591 houses provided in the medium term from Kākātangiata	76	591 homes is the proportion of homes that we expect could be enabled by existing wastewater capacity from the Longburn pressure sewer system in the medium term.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Disagrees with projected short term supply estimates for Mātangi and Kikiwhenua Residential Areas	80, 107	PNCC is comfortable with the short-term supply analysis in the 2023 Housing and Business Needs Assessment. It is noted that staff recommend this site be included in the FDS and that a private plan change application make the case regarding a lack of short-term supply. PNCC will keep an open mind in this regard through this process.	No change

## Te Utanganui – Officer Comments and Recommendations

Recommended changes to the draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Fragmented urban form indicated in the masterplan	40, 102, 107, 145, informal feedback	Accept. We recommend removing Areas D and E from the Master Plan in part because of fragmentation of urban form.	jj) Remove Areas D and E from the Future Development Strategy and Te Utanganui Master Plan.
813 Roberts Line to be included in the scope of Area B	23	We acknowledge the advantages that the submitter described for including their land for investigation for industrial use. There are on site flood constraints which would need further enquiry to confirm if the site is suitable for industrial development. There is merit in including the site for consideration when developing the District Plan change for Areas A and B.	kk) Add 813 Roberts Line into the Future Development Strategy but not as part of the Te Utanganui Master Plan as a medium-term growing out industrial area.
815 Roberts Line to be included in the scope of Area B	57	We acknowledge the advantages that the submitter described for including their land for investigation for industrial use. There are on site flood and highly productive land constraints which would need further enquiry to confirm inclusion in the Te Utanganui Master Plan however, which we recommend be conducted in the District Plan change for Areas A and B. We recommend inclusion of this site in the Future Development Strategy to support further investigation, but not to include this area in the Te Utanganui Master Plan until flood and highly productive land constraints are explored.	ll) Add 815 Roberts Line into the Future Development Strategy but not as part of the Te Utanganui Master Plan as a medium-term growing out industrial area.

Recommended changes to the draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
129 Richardsons Line to be included in the scope of Area A	60	We acknowledge the advantages that the submitter described for including their land for investigation for industrial use. There are on-site flood, highly productive land and liquefaction constraints which would need further enquiry to confirm the site is suitable for industrial development. There is merit to include the site in the District Plan change for Areas A and B. We recommend inclusion of this site in the Future Development Strategy to support further investigation, but not to include this area in the Te Utanganui Masterplan until flood and highly productive land constraints are explored.	mm) Add 129 Richardsons Line into the Future Development Strategy but not as part of the Te Utanganui Master Plan as a medium-term growing out industrial area.

Recommended changes to the draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
109 and 125 Kairanga-Bunnythorpe Road be included in the masterplan as a long-term growth area	31, 88	We acknowledge the advantages that the submitter described for including their land for investigation for industrial use. There are on site flood, highly productive land and liquefaction constraints which would need further enquiry to confirm the site is suitable for industrial development. There is merit to include the site in the District Plan change for Areas A and B. We recommend inclusion of this site in the Future Development Strategy to support further investigation, but not to include this area in the Te Utanganui Masterplan until flood and highly productive land constraints are explored. We recommend including reference to the Bunnythorpe Business Park under Opportunities for Housing and Business Growth, but do not recommend further references requested by the submitter until further information on the viability of the growth area is confirmed.	nn) Add 109 and 125 Kairanga-Bunnythorpe Road into the Future Development Strategy but not as part of the Te Utanganui Master Plan as a medium-term growing out industrial area.
			oo) Add the following text to page 36: <u>“The Bunnythorpe Business Park proposed for 109 and 125 Kairanga-Bunnythorpe Road is a location with transport and proximity advantages to the Te Utanganui area. We expect that a private plan change is explored to better understand the viability of the Bunnythorpe Business Park given significant flood risk and potential geotechnical and ecological constraints that make this site uncertain.”</u>



Recommended changes to the draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Request that PNCC work with KiwiRail to further investigate when planned stormwater detention areas for the KiwiRail Hub can be adapted to resolve flood risk in the precluded locations west of KiwiRail	145	The recommendation for the <b>submission point above</b> may provide the opportunity for this to be explored.	No change
Remove the proposed grade separation at Railway Road and Roberts Line	90	Precluding grade separation in advance of transport modelling and more detailed transport assessments would risk safe and efficient transport access between Area C, the KiwiRail Hub, Palmerston North Airport and the Regional Freight Ring Road. District Plan change or designation processes to implement Area C would be the appropriate time to assess impacts and effects of transport at the level that the submitter is seeking, which they would be an affected party to. Given a specific investigation into the most appropriate solution is some time away, a possible solution is to remove the reference in the Master Plan legend to 'over bridge' and replace with 'future connection.'	pp) Replace the reference on the Te Utanganui Master Plan legend to 'over bridge' with a descriptor of 'future connection.'

Recommended changes to the draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Remove Area D from Te Utanganui masterplan	108, 121, 136	Area D is spatially disconnected from the existing North East Industrial Zone, proposed KiwiRail freight hub and the core area shown in the proposed Te Utanganui Master Plan. Area D's spatial disconnection will not promote a compact, connected, and efficient logistics hub. Given the site is not needed for expansion to Te Utanganui until 2052, further work can be undertaken in the meantime to investigate other land expansion options.	qq) Remove Area D from the Future Development Strategy. Remove Area D from the Te Utanganui Masterplan.
Remove Areas E from Te Utanganui masterplan	108, 136	Area E is spatially disconnected from the existing North East Industrial Zone, proposed KiwiRail freight hub and the core area shown in the proposed Te Utanganui Master Plan. Area D's spatial disconnection will not promote a compact, connected, and efficient logistics hub. Given the site is not needed for expansion to Te Utanganui until 2052, further work can be undertaken in the meantime to investigate other land expansion options.	rr) Remove Area E from the Future Development Strategy. Remove Area E from the Te Utanganui Masterplan.

Recommended changes to the draft Future Development Strategy 2024			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Remove the proposed road link between Richardsons Line and Aldersons Drive	90	Removing the proposed road link between Richardsons Line and Aldersons Line would provide less direct access to the Manawatū Regional Freight Ring Road for the submitter. It would also place more transport pressure on Railway Road and El Prado Drive, which is planned for an access to Richardsons Line in the short term. The El Prado Drive to Richardsons Line road link creates less of a need for the Aldersons Drive to Richardsons Line road link but provides less direct access from industry in the North East Industrial Zone to the Manawatū Regional Freight Ring Road. We recommend the removal of the road link but note that it is a sub-optimal outcome for the wider logistics hub.	ss) Remove the 'Main Freight Road' and 'Road Intersection Design' indicated on the Te Utanganui Masterplan between Aldersons Drive and Richardsons Line. Update map 14 (Land Transport- roading network) accordingly.
Remove the stormwater area indicated on 703 Roberts Line	90	Since the Te Utanganui Masterplan was produced, the submitter has lodged a resource consent which resolves the stormwater risks that the indicative stormwater area had sought to manage. We accept the stormwater area is no longer needed.	tt) Remove the 'Stormwater Wetland Zone' associated with 703 Roberts Line from the Te Utanganui Masterplan. Update maps 13 (Stormwater network) and 23 (Open space network) accordingly.

Refer submitter comment to the preparation of the Future Development Strategy Implementation Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Whether we are acting quickly enough to take advantage of the economic opportunities	7	PNCC's Housing and Business Needs Assessment and the Future Development Strategy are reviewed on a 3 yearly basis. This work draws on growth projections designed to ensure planning for growth responds to economic opportunities and the cyclical nature of the market.	No change
Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Risk of environmental degradation such as vegetation clearance, soil erosion, and air and waterway/groundwater contamination	32, 40, 47, 67, 73, 102, 108, 110, 145	Technical reports supporting plan change processes at the time of rezoning will address these issues as will PNCC's engineering standards for land development.	No change
Noise effects	32, 54, 68, 73, 74, 82, 97, 108, 122	Acoustic assessments will inform the development of noise standards through the RMA rezoning process.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Retention of highly productive land	40, 55, 67, 68, 71, 85, 87, 92, 108, 110, 121, 122, 128, 136, 137, 138, 145	Any plan change proposing to rezone land will need to meet tests under National Policy Statement for Highly Productive Land.	No change
Challenging topography in Area C	40, 102, 110, 120, 126, 145	Geotechnical, land stability and erosion issues will be examined by technical assessments through the RMA rezoning process.	No change
Social and economic impact on local residents and neighbours	23, 31, 37, 40, 46, 55, 56, 59, 61, 68, 71, 72, 82, 85, 91, 97, 98, 102, 108, 111, 115, 119, 120, 121, 126, 121, 122, 128, 131, 143, 145	The potential for social and economic impacts is acknowledged. The RMA rezoning process (Plan Change) requires adverse environmental effects on communities to be considered and managed (noise, visual effects, transport safety, stormwater, community severance). The RMA process does not provide for the consideration of economic impacts of rezoning proposals other than the need to manage the adverse effects of proposed development.	No change
Transport effects	40, 54, 73, 82, 89, 90, 97, 99, 102, 108, 117, 122, 128, 133, 135, 145	Transport effects associated with development of Te Utanganui will be examined by technical assessments through the Resource Management Act rezoning process.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Light pollution	54	Environmental effects associated light will be examined through technical assessments through the RMA rezoning process.	No change
Concern about whether it's feasible	11, 87, 102, 112, 113, 122, 145	The package of technical assessments developed to examine the viability of the proposed rezoning of land will collectively build a picture around whether development and supporting infrastructure investment is viable.	No change
Increased stormwater risk north of Area B	23	Environmental effects associated with stormwater will be examined by technical assessments through the RMA rezoning process.	No change
Concern about consultation with the community, neighbours, farming representatives and local Iwi	34, 71, 72, 83, 99, 102, 108, 115, 122, 128, 142	An initial round of engagement with directly affected landowners and surrounding landowners was undertaken in October and December 2023. The FDS consultation process is the primary process for broader community engagement on Te Utanganui. Further public consultation would be anticipated for each area proposed for rezoning through a District Plan change and any possible designation processes for infrastructure.	No change
Concern about the coping capacity of the natural landscape	49	Environmental effects associated related to impacts on natural landscape will be examined by technical assessments through the RMA rezoning process.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about land acquisition for any growth infrastructure	50, 63, 74, 90, 102, 115, 121	Assessment of infrastructure need will be undertaken at the plan change stage. Any subsequent need to acquire land will be discussed and work through with affected landowner(s) at the time.	No change
Concern about how Te Utanganui will make the city more attractive to live in for future residents	12, 73	The RMA plan change process will assess the need for controls to manage effects on landscape amenity, transport, open space and urban form and function.	No change
Concern about how Te Utanganui and similar developments can attract necessary talent to the city e.g. doctors, teachers, academics	73	The plan change process will seek to establish controls that enable development, investment, and subsequent attraction of talent to the city.	No change
Cross boundary effects on the commuter and freight network to Feilding and rural amenity of Manawatū District	89, 107	The plan change process will assess impacts and develop a framework of controls that address effects on the transport network and surrounding rural amenity.	No change
Concern about flood and liquefaction risk	99, 108, 122, 128, 135, 136, 138	The plan change process will assess impacts and develop a framework of controls that address risk associated with flood and liquefaction constraints.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about effects on the airport and air navigation aids	95, 102	The Te Utanganui Master Plan has been developed to avoid locations under the airport and approach and landing surfaces and associated navigation aids.	No change
Concern about limitations posed from high voltage powerlines within the masterplan area	102	Conversations with infrastructure providers will be undertaken as part of the plan change process.	No change
Lack of existing network services	102, 136	As part preparations for the LTP, PNCC develops asset management plans that include growth programmes to provide for supporting infrastructure. These growth programmes then feed into the Development Contributions Policy so that the cost of these programmes is paid by subsequent development.	No change
Concern about increased carbon emissions	102	Consideration of the impacts on carbon will be considered as part of the plan change process to rezone land.	No change
Concern about lack of information about future residential growth at Bunnythorpe	108	With the development of a growing employment node at Te Utanganui over the next 30 years a need for residential growth has been identified. A discussion with the Bunnythorpe community is needed to identify where this should be located in the future. This discussion needs to occur once the business case for the future freight ring road identifies the final alignment of this road corridor.	No change



Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the heritage value of existing farms and commercial buildings	129	The plan change process will assess the heritage values of land and buildings within Te Utanganui and determine the extent to which these qualify for heritage protection.	No change
Exclude Bunnythorpe Village from future housing growth	121	With the development of a growing employment node at Te Utanganui over the next 30 years a need for residential growth has been identified. A discussion with the Bunnythorpe community is needed to identify where this should be located in the future. This discussion needs to occur once the business case for the future freight ring road identifies the final alignment of this road corridor.	No change
The upgrade to the intersection of Richardsons and Roberts Lines be undertaken without requiring land from 703 Roberts Line	90	The identification of a future intersection upgrade at Richardsons and Roberts Line is a long-term signalling of potential needed upgrade over and above the negotiated upgrade the submitter has agreed with KiwiRail and PNCC as part of the NOR for the Rail Freight Hub. Any future upgrade of this intersection will include discussion with affected land owners at the time.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Further investigation to ensure that Airways' navigation infrastructure is not affected by Area C	95	Further investigation will occur at the scoping stage of RMA plan change development.	No change
Coordinate timing of Te Utanganui with Fielding's Kawakawa Industrial Precinct and Braeburn Industrial Area	122	The Kawakawa Industrial Precinct is part of Te Utanganui's broader regional strategy for a central north island logistics hub. The Braeburn Industrial Area at this stage does not provide for large floor plate industrial and logistics activities.	No change
Consider utilising flood prone areas for stormwater management and biodiversity	135, 138	This will be considered through the RMA plan change process.	No change
Requests the application of the Whānau Ora Framework to the development of the Te Utanganui Masterplan	Informal feedback	Accept and acknowledge.	No change
Concern about future transport effects on Roberts Line	Informal feedback	Transport effects and solutions will be considered when developing technical inputs to RMA plan change proposals to rezone land.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about highly productive land	Informal feedback	Highly productive land is one constraint to be considered alongside others (flooding, airport operations, infrastructure, stormwater) when assessing the merits of rezoning land through the RMA plan change process. Any zoning proposal will need to meet tests under the National Policy Statement for Highly Productive Land to be proceed.	No change
Concern about flood risk constraints to further residential growth at Bunnythorpe	Informal feedback	Alongside a conversation with the community about where future residential development may occur in Bunnythorpe, any plan change will have to consider and investigate flood constraints.	No change
Concern about the impact that nearby industrial would have on the rural character of Linklater Reserve	145	The closest point of Linklater Reserve is ~140m from Area C as the crow flies. We would expect that a landscape assessment as part of a District Plan change for Area C would assess the effects of industrial land-use on the surrounding landscape.	No change

Refer submitter comment to the relevant plan change process			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consider rural-residential development on smaller rural blocks within the Te Utanganui Masterplan area	135	The consideration of future residential growth in this location is signalled in the Master Plan for the medium term for Bunnythorpe. We do not yet have enough of an understanding of the constraints to the village to know what is possible.	No change
Concern about the effect of Area C on an existing overwintering site for monarch butterflies.	145	Officers do not know the effect of proposed industrial land-use on the identified butterfly overwintering site. Officers are open to visiting the site to better understand its importance and potential sensitivity to land-use change. Assessment of the relevancy of this site could be discussed at the District Plan change stage.	No change
Refer to the PNCC Long Term Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that roading upgrades along Roberts Line are scheduled earlier to cope with existing effects	23	Timing of road upgrades are a decision made by both PNCC and NZTA. PNCC's 2024/34 LTP includes increased planned investment over the next decade to upgrade roads, bridges, and intersections to meet the growth needs of Te Utanganui. Timing of investment will be made by PNCC and NZTA based on the extent to which investment in Te Utanganui grows over the next decade and creates additional demand on the transport network.	No change

Refer to the PNCC Long Term Plan			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Purchase properties affected by Areas C, D, and E to remove the risk of uncertainty	108, 131	This is a request that would need to be discussed with Elected Members and considered as part of the PNCC LTP.	No change
Concern about existing transport issues on Cleverly Line and 'Kung-fu Corner'	Informal feedback	This concern is not a matter that can be addressed through the Future Development Strategy. This would be LTP matter for PNCC, HRC and NZTA.	No change
Install a footpath on Roberts Line from Kelvin Grove Road to the Linklater Reserve entrance	145	Specific active mode improvements in the city are better recommended for addressing in the PNCC LTP.	No change
Install a cycleway on Roberts Line from Kelvin Grove Road to Railway Road	145	Specific active mode improvements in the city are better recommended for addressing in the PNCC LTP.	No change

Refer to the Palmerston North Integrated Transport Initiative			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that the extension of the Palmerston Airport runway is coordinated with improvements under the Palmerston North Integrated Transport Initiative	89	Noted.	No change
Requests a tunnel under the airport runway extension	117	Noted.	No change
Consider a long term regional roading infrastructure plan similar to Accessing Central New Zealand	31	Noted.	No change
Responsibility of other agencies			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consolidate terminal facilities for passenger services across road/rail/air	55	The submitter's request is the responsibility of KiwiRail and the Palmerston North Airport.	No change
Relocate the KiwiRail Hub to Marton	105	The submitter's request is the responsibility of KiwiRail.	No change

Responsibility of other agencies			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Divert the railway onto No 1 Line to Flyers and Richardsons Lines to free up land and provide flood protection opportunities	105	The submitter's request is the responsibility of KiwiRail.	No change
Concern about inconsistency with the design and delivery of the KiwiRail Notice of Requirement and Palmerston North Integrated Transport Initiative	90, 102	Both KiwiRail and NZTA engaged through the NOR process to ensure alignment of strategic investment in infrastructure. Both parties were involved in the development of the Te Utanganui Master Plan.	No change
Concern about the timing of the KiwiRail Hub	Informal feedback	The submitter's request is the responsibility of KiwiRail.	No change
Out of scope			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Consider relocating all houses in Bunnythorpe to provide a new village location	121	PNCC and Horizons do not have the power or means to relocate an existing village.	No change
Maintain the speed limit along Railway Road to 100kph	98	Railway Road is anticipated to be closed as part of the development of the KiwiRail Hub.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the maintenance of infrastructure	26, 128	Infrastructure condition is assessed through the development of asset management plans by HRC and PNCC. The programme of capital works required to address condition is then funded through the LTP process.	No change
Effects on crime rates and antisocial behaviour	32, 102	This concern is not an issue that can be addressed through the FDS. Planning standards through the RMA rezoning process can look at crime prevention through environmental design when developing land use rules.	No change
Clarity about what the road typologies in the masterplan mean in reality	102	References to Main Freight Road, Freight Ring Road, Upgraded Existing Freight Road, Connector Freight Road, Upgraded Commuter Road provide a high-level indication of the primary function of those road corridors. Reference in the description to freight indicates an engineered road that seeks to direct heavy vehicles onto these corridors and away from local city roads. Reference to commuter roads relates to corridors designed and prioritised for city residents to access places of employment.	No change



No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about the lack of options presented	108	Te Utanganui is co-located within an area close to existing NEIZ, the airport and the proposed KiwiRail Freight Hub. Its purpose is to plan for the future development of a multi-modal freight hub (road, rail and air) over a 50-year time horizon. Options analysis for the Master Plan assessed constraints on land in the broader area (flooding, transport, airport, rail, noise, connectivity) and settled on the Master Plan area balancing competing development constraints.	No change
Requests that Stages 2 and 3 (Areas C, D, E) of the Te Utanganui Masterplan are progressed at the same time as Stage 1 (Areas A and B)	37, 108, 131	Growth projections for demand of industrial land over the next 30 years has informed the staging of development for Te Utanganui. The infrastructure cost of rolling out supporting infrastructure to Areas A, B, C, D and E at the same time is not an affordable option for PNCC, NZTA and other infrastructure providers.	No change
Requests that Area D is proposed as an alternative industrial growth area to Area C in the medium term	40, 145	The timing of Area C is tied to the commencement of KiwiRail operations in 2032 and wider investment needed to provide supporting infrastructure. A separate recommendation suggests Area D and E are removed from the FDS and other options closer to the core Te Utanganui area are investigated.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Requests that Area E is proposed as an alternative industrial growth area to Area D	71, 72	Both Area E and D are currently provided for in the FDS. A separate recommendation suggests Area D and E are removed from the FDS and other options closer to the core Te Utanganui area are investigated.	
Remove Area C from Te Utanganui masterplan	110, 145	Given the constraints (flooding, stormwater, soils, airport approach and take-off surfaces, access and investment in infrastructure) associated with land in the surrounding area, on balance Area C has been identified as the most suitable location to provide for the scale growth needed for industrial land in the medium to long term. Further investigation at the plan change stage would confirm this suitability.	No change
Remove 159 and 161 Kelvin Grove Road from Area C	120, 126		
Requests that the land between Kairanga-Bunnythorpe Road, Area A and B, and Roberts Line west is proposed as an alternative industrial growth area to Area C	102, 145, informal feedback	This area was precluded early on due to high flood risk.	No change
Requests intensifying existing industrial areas rather than growing more	54, 85, 102, 128	There is insufficient land supply in the location and market suitable for catering for projected distribution and logistics industries.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Request to incorporate safety mechanisms so that heavy traffic does not increase along Roberts Line past the Linklater Reserve carpark.	145	Transport upgrades signalled in the Te Utanganui Masterplan are recommended in order to encourage heavy vehicles to use roads within the North East Industrial Zone and Roberts Line North to connect to the Manawatū Regional Freight Ring Road.	No change
State Highway 1 is already a sufficient by-pass alternative to the Manawatū Regional Freight Ring Road	140	State Highway 1 does not connect closely enough to Te Utanganui or Te Ahu a Turanga to be a sufficient alternative to the Manawatū Regional Freight Ring Road.	No change
Requests that Te Utanganui be sited further away from Bunnythorpe	56, 68	There are no alternative areas of sufficient size and scale that allows for the agglomeration of freight assets required for projected distribution and logistics industries. To achieve the objective of being a multi-modal freight hub Te Utanganui needs to be in close proximity to the Palmerston North Airport and the proposed Kiwi Rail freight hub. Structure constraints such as flooding and the airport and approach surface constrain location options.	No change
Support for continued Iwi involvement in the Te Utanganui Masterplan	Informal feedback	Rangitāne and neighbouring iwi were involved in the development of the Te Utanganui Master Plan and will continue to be closely involved as a partner in the development of subsequent plan changes.	No change

No treatment required			
Submission Theme	Sub no.	Officer Response	Officer Recommendation
Concern about how the Regional Freight Ring Road will affect Bunnythorpe Village	Informal feedback	A proposed business case to identify the alignment of the Regional Freight Ring Road is in years 2 and 3 of the PNCC LTP. The business case will involve a discussion with the Bunnythorpe and wider community about how best to settle on an alignment that has least impact on communities. In particular, the Bunnythorpe community has raised concern about the Regional Freight Ring Road creating physical and community severance.	No change
Concern about effects on property values for properties north of Newbury Line and west of Roberts Line	Informal feedback	We acknowledge the concern. However, the RMA process to rezone land does not allow effects on property values to be considered apart from ensuring appropriate land use controls are in place to manage adverse environmental effects.	No change