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Kia ora,

**SUBMISSION: PROPOSED PRIVATE PLAN CHANGE– MANDERSON BUSH**

Thank you for the opportunity to make a submission on Proposed Private Plan Change: Manderson Bush.

Horizons Regional Council (**Horizons**) is responsible for managing natural resources across our region, which includes flood control, air and water quality monitoring, pest control, facilitating economic growth, leading regional land transport planning and coordinating the region's response to natural disasters.

Environmental planning is a key function. Horizons' integrated planning document, the One Plan, sets out four keystone environmental issues for the region – surface water quality degradation, increasing water demand, unsustainable hill country land use, and threatened indigenous biodiversity.

Horizons has no trade competition advantage in this submission. Our interest in the proposed plan change is primarily from our role as the regional authority for the area that is subject to the plan change. This submission reviews the proposed private plan change in relation to its alignment with the National Policy Statement on Urban Development (**NPS-UD**), National Policy Statement for Highly Productive Land (**NPS-HPL**), National Policy Statement for Freshwater Management (**NPS-FM**), and the Regional Policy Statement (**RPS**) components of the One Plan, including whether the proposed changes give effect to those higher order planning documents.

**General Comment**

Horizons generally supports Proposed Private Plan Change – Manderson Bush (**PPC**). However, the proposed plan change must give effect to the NPS-UD and the Urban Form and Development (UFD) policies of the RPS.

Horizons also notes a number of additional matters relevant to the future development and implementation of the PPC area, including the presence of Horizons drainage scheme infrastructure and associated requirements under the One Plan, the management of flood hazard risk within the wider Taonui basin and Whiskey Creek catchment, the application of the National Policy Statement for Natural Hazards 2025 (**NPS-NH**), and the management of liquefaction risk through future engineering design and building controls. Horizons also recognises the opportunities for biodiversity restoration, recreation, and environmental education associated with Manderson Bush. Horizons notes that a number of these matters will require ongoing consideration through future detailed design, consenting, engineering assessment, reserve planning, and implementation processes.

**In this context, while generally supporting the PPC, Horizons seeks the relief set out below.**

### **Submission Points**

#### **1. Proposed development within the Taonui Basin Floodway**

RPS HAZ-NH Policy 10 (1) states:

*“The Regional Council and Territorial Authorities\* must not allow the establishment of any new structure\* or activity, or any increase in the scale of any existing structure\* or activity, within a floodway\* mapped in RP-SCHED10 unless:*

- a. there is a functional necessity to locate the structure\* or activity within such an area, and*
- b. the structure\* or activity is designed so that the adverse effects\* of a 0.5% annual exceedance probability (AEP) (1 in 200 year) flood event<sup>2</sup> on it are avoided or mitigated, and*
- c. the structure\* or activity is designed so that adverse effects\* on the environment\*, including the functioning of the floodway, arising from the structure\* or activity during a flood event are avoided or mitigated, in which case the structure\* or activity may be allowed.”*

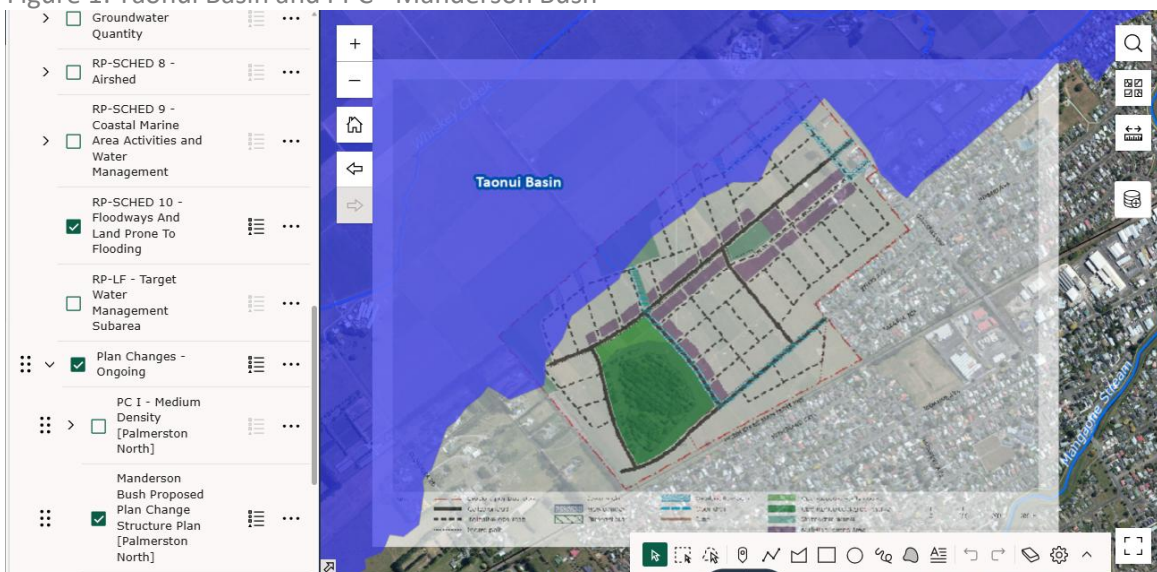
RPS Haz-NH Policy 10 (3) further states:

*“Flood hazard avoidance\* must be preferred to flood hazard mitigation.”*

Horizons observes that part of the proposed development overlaps with the Taonui Basin floodway mapped in [RP-SCHED10](#) (see Figure 1).

Horizons considers that flood hazard avoidance is achievable within the PPC area.

Figure 1: Taonui Basin and PPC - Manderson Bush



### Relief sought

Horizons seeks that Palmerston North City Council (PNCC) **revise the structure plan and associated provisions** to give effect to RPS HAZ-NH Policy 10, including by avoiding urban development within the Taonui basin floodway mapped in One Plan [RP-SCHED10](#).

## 2. NPS-HPL

While Horizons acknowledges the applicant's assessment against clause 3.6 of the NPS-HPL, concerns remain regarding the methodology and evidential basis underpinning that assessment.

In particular, the assessment undertaken under clause 3.6(1)(b) appears to treat the north-western part of Palmerston North City as a separate locality or housing market. However, the current [Housing and Business Development Capacity Assessment](#)<sup>1</sup> (HBA) **does not identify or localise demand** for greenfield housing at that scale or within a distinct north-western locality. Section 5.3.2 ("Dwelling demand by location") of the HBA states:

*"In terms of the locations we estimate demand will be, we estimate demand at the following percentages for greenfield, infill and rural/rural-residential..."*

This indicates that the HBA identifies demand at a broader scale rather than by specific greenfield locality or market area.

<sup>1</sup> Palmerston North Housing and Business Development Capacity Assessment 2023

Clause 3.6(3) of the NPS-HPL sets out the matters to be considered in identifying localities and housing markets, and it is not clear that the assessment has adequately addressed those requirements.

Clause 3.6(3) states:

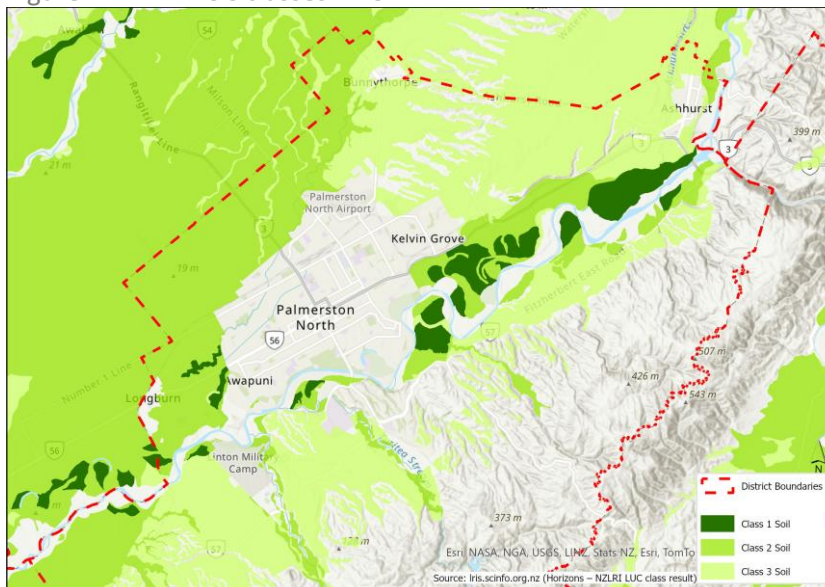
*“In subclause (1)(b), development capacity is within the same locality and market if it:*

- a) is in or close to a location where a demand for additional development capacity has been identified through a Housing and Business Assessment (or some equivalent document) in accordance with the National Policy Statement on Urban Development 2020; and*
- b) is for a market for the types of dwelling or business land that is in demand (as determined by a Housing and Business Assessment in accordance with the National Policy Statement on Urban Development 2020).”*

Horizons also notes that there are alternative areas of LUC Class 3 greenfield land available on the eastern and north-eastern sides of the city that should be considered as part of the reasonably practicable options assessment under clause 3.6 (see Figure 2).

Based on the information currently available, Horizons considers that the HPL assessment prepared in support of the PPC does not adequately demonstrate that the requirements of clause 3.6 of the NPS-HPL have been met.

Figure 2: NZLRI LUC classes 1 - 3



(Data source: <https://iris.scinfo.org.nz/layer/124196-horizons-nzlri-luc-class-result/>).

### Relief sought

Horizons seeks that PNCC ensures the PPC **fully gives effect to the NPS-HPL**, including by requiring the applicant to update and revise the clause 3.6 assessment having particular regard to the requirements of the NPS-HPL clause 3.6(3), and alternative LUC class 3 greenfield land on the eastern and north-eastern sides of the city.

### Alternative relief sought

Horizons seeks that PNCC **decline** the PPC application if clause 3.6 assessment fails to meet the requirements of the NPS-HPL.

## **3. Manderson Bush - Ecological Reserve**

Manderson Bush constitutes a threatened habitat with a high ecological value, which was identified under Schedule 6 of One Plan. Horizons considers the recommendations of [Kākātangiata Master Plan: Ecology Advice](#) related to protection and management of the bush are most appropriate, considering the high ecological value and rarity of indigenous forest remnants across the *Manawatū Plains*.

The report states (page 14):

*“A major opportunity for restoration of Manderson’s Bush is retirement of a buffer around the currently fenced forest and restorative forest planting of this buffer as well as underplanting the grazed forest areas (Fig. 8 & 9). **The recommended approach (Fig. 10) is to retire and plant an area 50 m from the existing forest edge** (see the white area in Fig. 10). This would require 6.6 ha of native planting and would effectively triple the aerial extent of Manderson’s Bush. This action is important as it directly addresses the depleted status of this forest ecosystem.”*

In this context, Horizons considers the PPC Structure Plan should be amended to address the recommendations of the [Kākātangiata Master Plan: Ecology Advice](#) report.

### Relief sought

Horizons seeks that PNCC:

- a) considers the recommendations for protection and management of Manderson Bush, and
- b) amends the extent of the Open Space Ecological Reserve in the proposed Structure Plan, and
- c) amends the extent of the proposed *Conservation and Amenity Zone* relevant to Manderson Bush.

#### 4. Stormwater Reserves

One Plan RPS HAZ-NH Policy 12 requires:

*“The Regional Council and Territorial Authorities must manage future development and activities in areas susceptible to natural hazard events (excluding flooding) in a manner which:*

- 1. ensures that any increase in risk to human life, property or infrastructure^ from natural hazard events is avoided where practicable, or mitigated where the risk cannot be practicably avoided,*
- 2. is unlikely to reduce the effectiveness of existing works, structures, natural landforms or other measures which serve to mitigate the effects of natural hazard events, and*
- 3. is unlikely to cause a significant increase in the scale or intensity of natural hazard events.”*

In the PPC, the attenuation basins (Stormwater Reserves) appear to be sized considering only the increased peak flow generated from the Manderson Bush development area, with no allowance made for external catchment flows. This approach appears to rely on the assumption that peak flows from the wider catchment are unlikely to coincide with peak flows generated from the development site.

However, concerns remain regarding the potential effects of prolonged tailwater conditions and additional external inflows into the attenuation basins during storm events. In particular, it is unclear whether the proposed stormwater management approach adequately considers cumulative catchment responses and the potential effects on upstream flood levels.

Accordingly, uncertainty remains as to whether the proposed development could adversely affect upstream flood levels or reduce the effectiveness of the wider stormwater and flood management systems.

#### Relief sought

Horizons seeks that PNCC:

- a) considers the concerns raised in this submission point, and
- b) requires further assessment of the attenuation basin design and revise the structure plan and associated provisions if the proposed attenuation basins are not demonstrated to adequately service stormwater runoff from the wider catchment.

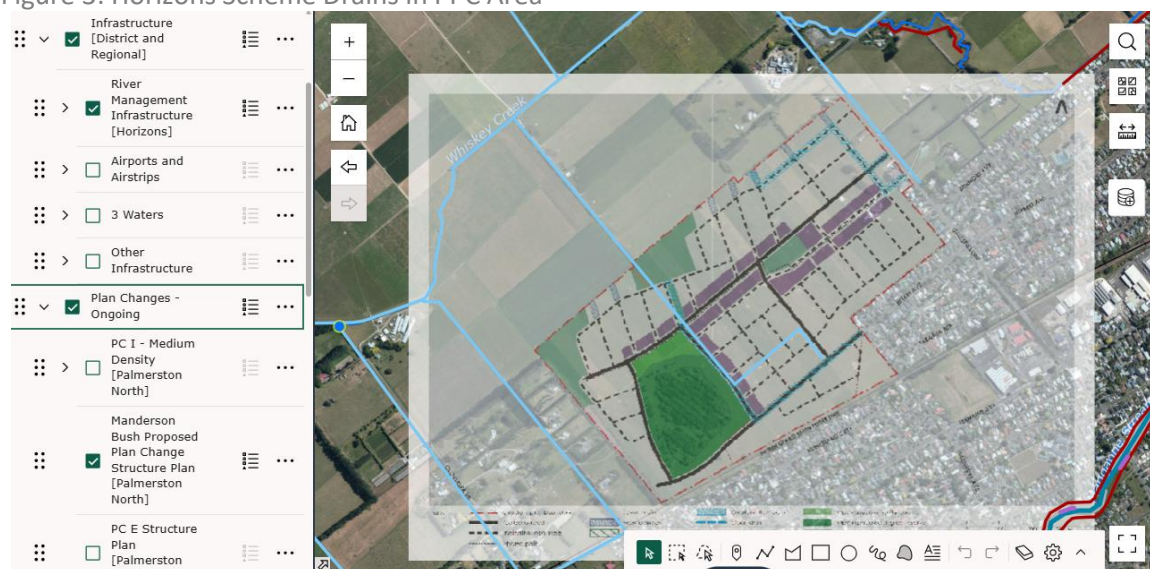


## 5. Manderson's Drain

Horizons observed that the proposed Structure Plan may involve modifications to the existing Manderson's Drain (see Figure 3). It is important to recognise that the drains within the property are Horizons Scheme Drains, and any works involving modification of an existing drain may require resource consent.

It is also improbable to clearly identify responsibility for the ongoing maintenance of the proposed stormwater and drainage infrastructure. Failure to maintain this infrastructure to its original design parameters may result in future flooding issues, including adverse effects in adjacent properties and the wider drainage network.

Figure 3: Horizons Scheme Drains in PPC Area



### Relief sought

Horizons seeks that PNCC ensures any required consents for the proposed modifications to Manderson's Drain are obtained prior to approval of the PPC.

### Alternative relief sought

Horizons seeks that PNCC amends the proposed Structure Plan and the stormwater management approach to ensure that the existing form, capacity, and function of Manderson's Drain are maintained and not adversely affected by the proposed development.

## 6. Structure Plan and Transport Infrastructure

RPS UFD Policy 4(1)(d) states:

*“Intensification and expansion of urban environments\* is provided for and enabled in district plans^ where:*

*d. development is well serviced by existing or planned development infrastructure\* and enables provision of public transport\*, and additional infrastructure\* required to service the development capacity\* is likely to be achieved”*

RPS UFD Policy 4(2)(c) states:

*“In addition to meeting the criteria in (1) above, the expansion of urban environments\* must only occur where it:*

*c. is well-connected along transport corridors and is designed to enable a variety of transport modes”*

Horizons considers that the indicative road cross sections included in [Urban Design and Landscape Report](#) (Figures 4 and 5) are generally acceptable in supporting a well-functioning urban environment and giving effect to RPS UFD Policy 4 (1) and (2), particularly in providing for active and public transport. However, Horizons notes that these road cross sections have not been included in the PPC.

Figure 4: Indicative cross section for Connector Roads

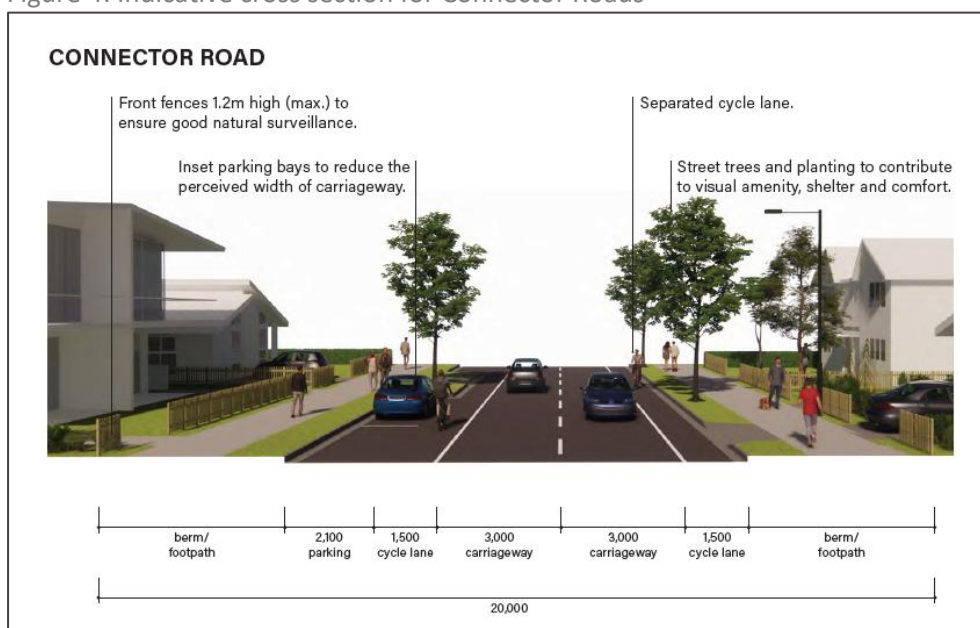
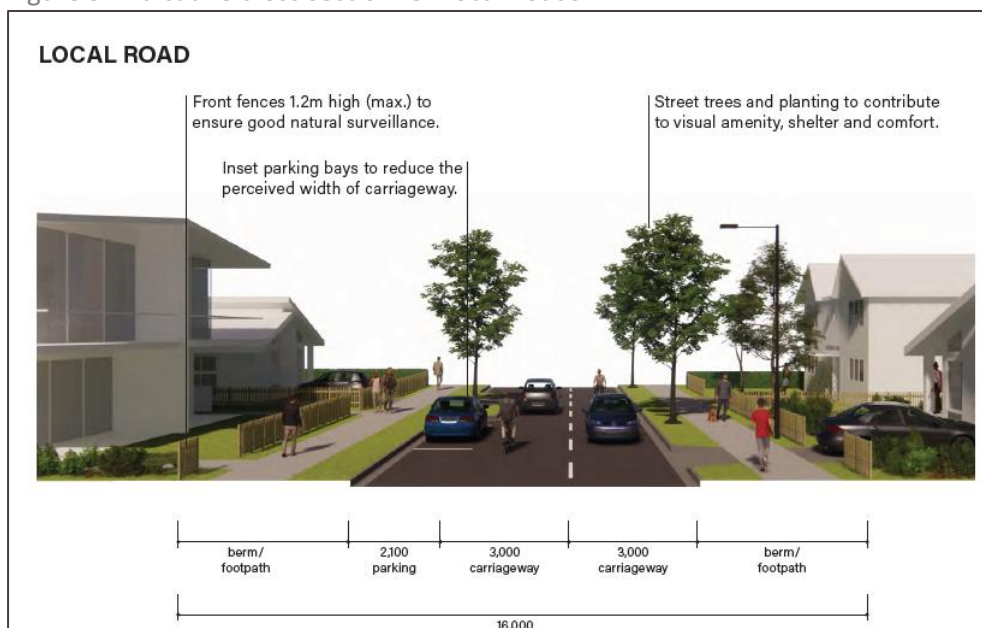




Figure 5: Indicative cross section for Local Roads



### Relief sought

Horizons seeks that PNCC includes indicative road cross sections shown on pages 30 and 31 of the [Urban Design and Landscape Report](#) as annexures to the Structure Plan.

### **PPC Objectives**

- Horizons **supports** DEV08-O1, DEV08-O2, DEV08-O4, DEV08-O5, and DEV08-O6 as they give effect to the provisions in Urban Form and Development, Ecosystems and Indigenous Biodiversity, and Hazards and Risks chapters of the RPS.

### Relief sought

Horizons seeks that PNCC retains these provisions as notified.

- Horizons **supports in part** DEV08-O3 as the overall intent of the objective gives effect to relevant NPS-FM provisions and RPS provisions.

### Relief sought

Horizons seeks that PNCC revises the objective as follows:

*“Subdivision\* and development in the Manderson Bush Development Area contributes to an improvement in the health and wellbeing (including mauri) of related water bodies and freshwater ecosystems, including the Manawatū Awa and its lagoons and tributaries.”*

## PPC Policies

9. Horizons **supports** DEV08-P1, DEV08-P3, DEV08-P4, DEV08-P5, DEV08-P7, DEV08-P8, DEV08-P9, DEV08-P10, DEV08-P11, DEV08-P12, DEV08-P13, DEV08-P14, DEV08-P15, DEV08-P17, subject to the relief sought in submission points 1 to 5, as they give effect to relevant NPS-UD, NPS-FM, and RPS provisions.

### Relief sought

Horizons seeks that PNCC retains these provisions as notified, subject to any consequential amendments required as a result of the relief sought in submission points 1 to 5.

## PPC Rules and Performance Standards

10. Horizons **supports in part** DEV08-S3 as it gives effect to NPS-FM Policy 3, RPS UFD Policy 8, and RPS HAZ-NH Policies 12 and 13.

The Stormwater Management Report states in its section 3.2.3 *Land Imperviousness*:

*“The development was divided into several sub-catchments based on the planned lot and road layouts. As directed by Resonant, a 70% imperviousness was used as a conservative estimate based on the PNCC District Plan. An imperviousness/perviousness ratio of 70%:30% was applied to all catchments including lots and road reserve areas with the exception of the planned reserve which is not expected to be developed. An imperviousness/ perviousness ratio of 5%:95% was applied to the reserve catchment (Kahikatea Forest).”*

However, DEV08-S3 requires:

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

The National Planning Standards define net site area as:

*“means the total area of the site, but excludes:*

- a) any part of the site that provides legal access to another site;*
- b) any part of a rear site that provides legal access to that site;*
- c) any part of the site subject to a designation that may be taken or acquired under the Public Works Act 1981.”*

Horizons is concerned that the permeability standard in this performance standard may not achieve the stormwater management outcomes assumed in the Stormwater Management Report. In particular, the technical assessment appears to assume an overall 70% imperviousness : 30% perviousness ratio across the wider development area,

including roads and reserves, whereas the performance standard applies only at the individual net site scale.

As currently drafted, the performance standard may not secure the permeability outcomes relied upon in the stormwater modelling and may therefore result in stormwater effects that are inconsistent with the assumptions underpinning the technical assessment.

Relief sought

Horizons seeks that PNCC:

- a) amends DEV08-S3 to ensure that the permeability standard achieves the stormwater management outcomes and imperviousness assumptions relied upon in the Stormwater Management Report, and
- b) makes any consequential amendments to the structure plan, stormwater management provisions, or associated technical assessments as necessary.

11. Horizons **supports in part** DEV08-S4 as it gives effect to RPS HAZ-NH Policies 12 and 13.

The advice note of the performance standard states:

*“The required floor levels will be determined from relevant adjacent flood levels plus reasonable freeboard provided by **Horizons Regional Council**.”*

However, PNCC is the building consent authority responsible for determining appropriate freeboard and finished floor levels.

Relief sought

Horizons seeks that PNCC revises the advice note as follows:

*“The required floor levels will be determined by from relevant adjacent flood levels plus reasonable freeboard provided by ~~Horizons Regional Council~~ Palmerston North City Council.”*

**Consequential Changes**

12. Horizons **supports** the proposed consequential changes to Section 17 of the District Plan, they give effect to RPS ECO Policies 1 and 2.

Relief sought

Horizons seeks that PNCC retains these provisions as notified.

13. Horizons **supports** the proposed consequential changes to the zoning of the District Plan by including a new Conservation and Amenity Zone subject to the relief sought under the submission point 2. This consequential change gives effect to RPS ECO Policies 1 and 2.

Relief sought

Horizons seeks that PNCC retains these provisions subject to the relief sought under submission point 3.

Horizons seeks the relief set out above, or any further, alternative, or consequential relief necessary to address the matters raised and achieve the outcomes sought.

Horizons wishes to be heard in support of this submission. If others make similar submissions, Horizons would be open to presenting a joint case to the hearing panel.

Ngā mihi



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