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Subject: Proposed Plan Change Submission Form Form Submission
Date: Friday, 18 July 2025 12:41:25 pm

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Proposed Plan Change Submission Form Form Submission

There has been a submission of the form Proposed Plan Change Submission Form through your Make your mark Manawatu website.

Proposed Plan Change:

Proposed Plan Change E: Town Centre

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I ____ gain an advantage in trade competition through this submission.
could not

This submission specifically relates to:

PC E in its entirety. Please see our submission attached.

My submission is:

Please see submission attached.

I have included additional pages.

- [TATEC_Submission_Plan_Change_E_Town_Centre.pdf](#)

I seek the following decision from the Manawatū District Council.

Please see submission attached

I ____ to be heard in support of this submission.

I wish to be heard.

If others make a similar submission I ____ consider presenting a joint case with them at a hearing.

I will

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Proposed Plan Change E: Town Centre

Manawatu District Council

SUBMISSION TO

MANAWATŪ DISTRICT COUNCIL

135 MANCHESTER STREET, FEILDING, 4702

This submission has been sent to Manawatū District Council through their submission consultation form at:

<https://makeyourmark.manawatudc.govt.nz/district-plan-review/draft-plan-change-e-feilding-town-centre>

SUBMITTER INFORMATION

Ingoa TE AO TŪROA ENVIRONMENTAL CENTRE

Iwi RANGITĀNE O MANAWATŪ

Wāhi Noho

[REDACTED]

[REDACTED]

PALMERSTON NORTH

Īmēra

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Waea Pūkoro



Kaiwhakahaere

D.P. HARRIS, O.N.Z.M, LLB, PGDIPBUSADMIN

CHIEF EXECUTIVE OFFICER

This is a submission on a change proposed to the following plan (the **proposal**):

Proposed Plan Change E: Town Centre to the Manawatū District Council District Plan.

We could not gain an advantage in trade competition through this submission.

The specific provisions of the proposal that our submission relates to are:

PCE in its entirety as our submission points relate to the objectives, policies, rules and standards.

Our submission is:

See the documents attached for our submission.

We seek the following decision from the local authority:

See the documents attached for the decisions we seek.

We wish to be **heard** in support of our submission.

If others make a similar submission, we will consider presenting a joint case with them at a hearing.



Danielle Harris, O.N.Z.M, LLB, PGDipBusAdmin

Chief Executive Officer

on behalf of Rangitāne o Manawatū

18 July 2025

Electronic address for service of submitter: danielle@rangitaane.iwi.nz

Telephone: [REDACTED]

Postal address: [REDACTED]

Contact person: Danielle Harris

OUR SUBMISSION IS:

Development and redevelopment in the existing urban environment of Kawakawa (Feilding) presents an opportunity to enhance the mauri of wai and improve outcomes for whānau and te taiao. TATEC are broadly supportive of redeveloping the provisions for the Town Centre and Mixed Use Zones in Kawakawa, as this provides opportunities to:

- Provide for Māori cultural expression and norms.
- Improve environmental outcomes, including the quantity and quality of stormwater entering waterways and increasing indigenous vegetation cover.

Te Ao Tūroa Environmental Centre (a Rangitāne o Manawatū representative organisation) provided written feedback to Manawatū District Council when they sought feedback online in 2024, and the plan change was in draft form. In that feedback, we expressed that the Council was not meeting its statutory obligations to us in plan-making, specifically in relation to sections 74 and 75, as well as sections 3 and 3B of the First Schedule of the Resource Management Act 1991 (the Act). We sought engagement with the Council to participate in the planning process, which, disappointingly, has not happened. It is our view that the Council has not met their obligations under the RMA.

In our feedback, we raised the following key resource management issues of concern to us:

- Development in the zones degrading the health and mauri of wai
- Stormwater management
- Climate change
- Cultural expression
- Infrastructure readiness and improvements
- Increasing indigenous biodiversity
- Land uses in the zones

We have attached our original feedback to this submission, so that Council's section 42A officer and decision-makers have this information available to them in the next stages of the process.

TATEC must express our serious concerns with Manawatū District Council's lack of meaningful consultation and incorporation of the substance of our previous feedback on the draft PCE. In the plan change, as notified, it is not clear to us how resource management issues of concern to us have been considered or addressed.

We seek a Town Centre and Mixed Use Zone in Kawakawa that improves outcomes for te taiao, enables Māori cultural expression, and is certain about outcomes. As drafted, we submit that the plan change does not achieve this. Rangitāne remain committed to working, as Tiriti partners and in good faith with the Council to improve PCE so it delivers on these outcomes and aspirations.

Our submission is structured as follows:

- A description of Te Ao Tūroa Environmental Centre and Rangitāne o Manawatū
- Key issues of concern to us and relief sought

1.1 TE AO TŪROA ENVIRONMENTAL CENTRE

Te Ao Tūroa Environmental Centre (TATEC) contributes to upholding kaitiakitanga on behalf of Rangitāne o Manawatū Iwi (Rangitāne). We promote the health and well-being of our people, the environment, wāhi tapu and taonga, by forming positive relationships and partnerships with local councils, government agencies, private developers, and the wider community. TATEC undertakes ecological and cultural monitoring projects, initiatives to reduce plastics in waterways and restoration of waterways through planting and, weed and pest control. We engage in planning processes, including local policy reviews, town planning and resource consenting.

We are part of Best Care (Whakapai Hauora) Charitable Trust, which includes a collective of health services run by our iwi for Tanenuiarangi Manawatū Charitable Trust¹. We deliver a Rangitānenuirawa model of environmental management and have developed a means to identify and measure outcomes in resource management sought by Rangitāne using Te Ara Whānau Ora (the Whānau Ora Pathways Framework). Whānau Ora was originally developed by our esteemed kaumātua Sir Mason Durie and Dame Tariana Turia, who applied it to our health-focused services.

1.2 RANGITĀNE O MANAWATŪ

Rangitāne ancestors arrived in Aotearoa aboard the Kurahaupō waka over 30 generations ago. Whatonga was a captain of the waka and is the eponymous ancestor whom we, the people of Rangitāne, trace our lineage. He settled in the Heretaunga area (Hawke's Bay) and explored a large part of Aotearoa. Rangitāne was the grandson of Whatonga, whose descendants occupy the Manawatū and other areas of the lower North Island and the top of the South Island today. At the turn of the 19th Century, Rangitāne and Rangitāne whanaunga had held mana over nearly the entire drainage basin of the Manawatū Awa for many hundreds of years.

Life centred around the awa, its tributaries, lakes, and wetlands, which came to shape the worldview and values system of our Iwi today^{2,3}. Our worldview is based on the holistic principle that all elements are interconnected. Ecosystems within our environment rely on many elements, both physical and spiritual, at many scales, to function effectively. When one part of that system is interrupted, disturbed, or impacted,

¹ *Tanenuiarangi Manawatū Charitable Trust represents Rangitāne o Manawatū as an iwi authority for the purposes of the Act*

² *McEwen, J.M. (1986). Rangitāne: A tribal History. Reed Books: Auckland.*

³ *Wai 182, Rangitāne o Manawatū. Tanenuiarangi Manawatū Incorporated Office of Treaty Settlements.*

Te Ao Māori becomes imbalanced, affecting its functionality, which in turn influences the health and well-being of that environment and us as people.

Whakapapa (our genealogy) and mātauranga Māori (our traditional and contemporary knowledge) inform our understanding of, and connection to the environment. Every part of the environment has a common genealogy descending from a common ancestor. The principal ancestor is Io Matua Te Kore (the parentless one), who existed in Te Kore (the realm of potential being). Then descended Ngā Pō (the many nights), Ranginui, and Papatūānuku (Sky Father and Earth Mother). The separation of Rangi and Papa by their children brought forth Te Ao Mārama (the world of light in which we live). This whakapapa places us as descendants of the environment they inhabit. It reinforces our identity and a deep connection to our lands.

This mātauranga links us to the world, creating an inseparable bond and a responsibility to protect the environment from misuse. We have affirmed mana whenua in Manawatū for hundreds of years, thus have a deep connection to the life-giving resources of the land and waters of the area. Kaitiakitanga is the inherent obligation and responsibility we have as mana whenua of this area, to nurture and protect, restore, and enhance the mauri of our environment for future generations.

Traditional entry to the Manawatū interior was gained by paddling and poling waka along the Manawatū Awa. At each major river bend, a permanent or seasonal village or pā existed within our history^{4,5}. The awa linked hapū (family groups) together to form who we are, now known as Rangitāne o Manawatū. Rangitāne are a collective of six different hapū.

Rangitāne o Manawatū have a statutory area of interest which covers 440,000 hectares of the Manawatū plains and associated maunga. It encompasses the Rangitikei Awa, Manawatū Awa and tributaries, including (but not limited to) the Oroua and Makino. Our area of interest also includes Kawakawa (Feilding) and other townships within the Manawatū District. The statutory area of interest is identified in *Figure 1* below.

⁴ Taylor & Sutton (1999). *Inventory of Rangitāne Heritage sites in Palmerston North City, 1999*. Palmerston North City Council.

⁵ Tanenuiarangi Manawatū Inc (1999). *Rangitāne Mahinga Kai Project*. Palmerston North.

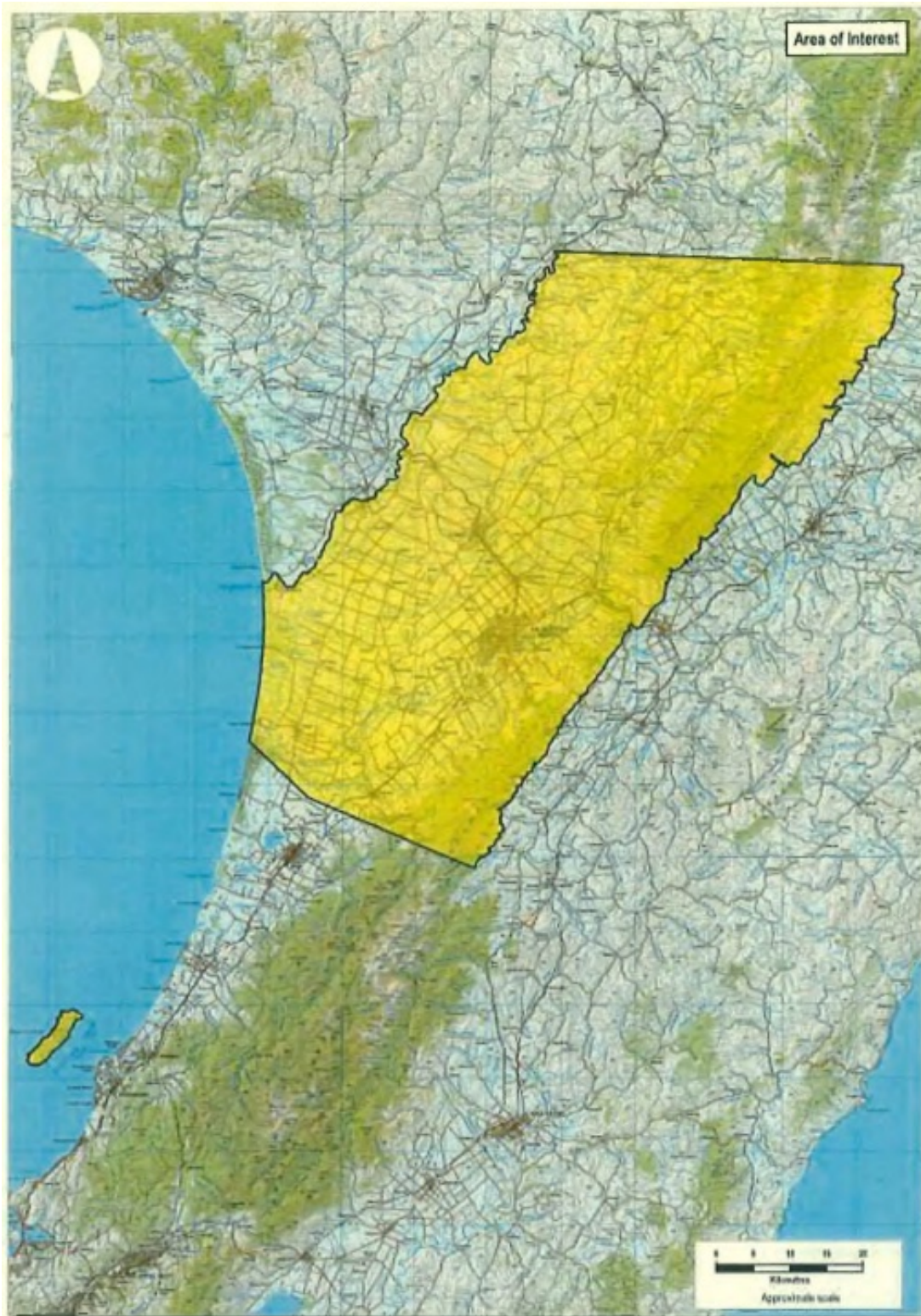


Figure 1. Rangitāne o Manawatū Statutory Area of Interest

1.3 KEY ISSUES OF CONCERN TO US

1.3.1 STORMWATER MANAGEMENT

Stormwater management from development in the Town Centre and Mixed Use Zones is a key issue of concern to us, particularly given its direct impact on the mauri of wai, Te Mana o te Wai, the health and wellbeing of freshwater and freshwater ecosystems and our culture. Without strong controls, stormwater flows and the quality of stormwater discharged will degrade water quality, alter flows and place further pressure on sensitive receiving environments. PCE must manage both the quality and quantity of stormwater appropriately. We seek prescriptive provisions for stormwater that require improvements to stormwater quality and the appropriate management of stormwater quantity. This includes avoiding building materials that could carry contaminants such as zinc and copper into whenua and waterways.

1.3.2 MĀORI CULTURAL EXPRESSION AND NORMS

Plan Change E should deliver an urban environment that enables Māori communities to provide for their social, economic and cultural wellbeing, and for their health and safety, both now, and in the future.

The plan change should enable Māori to express their cultural traditions and norms. TATEC are particularly concerned that as drafted, there are no objectives and policies around these matters. Moreover, as drafted the objectives and policies may prevent these aspirations as they include direction around new development 'being compatible with' and 'enhancing' character and amenity values. We seek provisions that enable Māori cultural expression and norms in the plan change area. We support provisions for papākainga housing in the zones.

1.3.3 STATUTORY ACKNOWLEDGEMENTS AND OUR PLANNING FRAMEWORKS

The proposed PCE fails to recognise or incorporate key aspects of Rangitāne *Iwi Environmental Management Plan* (IMP), Whānau Ora, or to acknowledge their statutory acknowledgements under the *Rangitāne o Manawatū Claims Settlement Act 2016*; particularly in relation to ancestral awa. These are not symbolic concerns; they are legal and cultural imperatives that must shape all decisions affecting land, water, and community wellbeing in our rohe. We seek that the Council takes into account IMP, considers our submission, and previous feedback as describing the resource management issues of concern to us, and in their section 42A report, details how they have addressed these issues in PCE.

1.3.4 NATIONAL DIRECTION

We are concerned that the PCE has not adequately considered or given effect to key national direction, including the National Policy Statement for Freshwater Management (NPS-FM), the National Policy Statement for Indigenous Biodiversity (NPS-IB), and the National Policy Statement on Urban Development (NPS-UD). For example, the NPS-UD requires land to be infrastructure-ready. As notified, PCE does not include sufficient

information to ensure the land is infrastructure- ready. We therefore seek that the Council undertake a thorough review of the plan change to ensure it appropriately implements all relevant national direction, and supports strong, enforceable outcomes for freshwater, urban development and biodiversity.

1.3.5 INFRASTRUCTURE READINESS

TATEC are concerned about the infrastructure-readiness of the zone. In addition to stormwater, wastewater is also a significant concern, along with water availability. Information feeding into the plan change around growth and demand projections, and the resulting capacity assessments for the three waters, are not part of the plan change package. This is a serious concern to us. We seek that the Council release this information, and confirm the zone is infrastructure-ready, in accordance with the NPS-UD.

Attachment: Our previous feedback 2024

DRAFT PLAN CHANGE E: Town Centre and Mixed Use Zones

FEEDBACK ON BEHALF OF RANGITĀNE O MANAWATŪ

This is feedback by Te Ao Turoa Environmental Centre on draft Plan Change E proposal.

Te Ao Turoa Environmental Centre ('TATEC') contributes to upholding kaitiakitanga on behalf of Rangitāne o Manawatū iwi ('Rangitāne'). We promote the health and well-being of our people, the environment, wāhi tapu and taonga by forming positive relationships and partnerships with local councils, government agencies, private developers, and the wider community.

The Environmental Centre undertakes ecological and cultural monitoring projects, restoration of waterways through planting, weed and pest control, and initiatives to reduce plastics in waterways. We engage in planning processes, including plan changes and resource consents. We also prepare cultural impact assessments, which assess proposals, to identify Rangitāne cultural values, effects on those values and measures to avoid, remedy or mitigate effects on those values.

RANGITĀNE O MANAWATŪ AND OUR CULTURAL AND CUSTOMARY CONNECTIONS

Rangitāne ancestors arrived in Aotearoa aboard the Kurahaupō waka over 30 generations ago. Whatonga was a captain of the waka and is the eponymous ancestor from whom we, the people of Rangitāne, trace our lineage. He settled in the Heretaunga area (Hawke's Bay) and explored a large part of Aotearoa. Rangitāne was the grandson of Whatonga, whose descendants occupy the Manawatū and other areas of the lower North Island and the top of the South Island today. At the turn of the 19th Century, Rangitāne and Rangitāne whānaunga had held mana over nearly the entire drainage basin of the Manawatū Awa for many hundreds of years.

Life centred around the awa, its tributaries, lakes and wetlands, which came to shape the worldview and values system of our iwi today.^{6,7} Our worldview is based on the holistic principle that all elements are interconnected. Ecosystems within our environment rely on many elements, both physical and spiritual, at many scales, to function effectively. When one part of that system is interrupted, disturbed, or impacted, Te Ao Māori becomes imbalanced, affecting its functionality, which in turn influences the health and well-being of that environment and us as people.

Whakapapa (our genealogy) and mātauranga Māori (our traditional and contemporary knowledge) inform our understanding of and connection to the environment. Every part

⁶ McEwen, J.M. (1986). *Rangitāne: A tribal History*. Reed Books: Auckland.

⁷ Wai 182, *Rangitāne o Manawatū*. Tanenuiarangi Manawatū Incorporated Office of Treaty Settlements.

of the environment has a common genealogy descending from a common ancestor. The principal ancestor is Io Matua Te Kore (the parentless one), who existed in Te Kore (the realm of potential being). Then descended Ngā Pō (the many nights), Ranginui, and Papatūānuku (Sky Father and Earth Mother). The separation of Rangi and Papa by their children brought forth Te Ao Mārama (the world of light in which we live). This whakapapa places us as descendants of the environment they inhabit. It reinforces our identity and a deep connection to our lands.

This mātauranga links us to the world, creating an inseparable bond and a responsibility to protect the environment from misuse. We have affirmed mana whenua over the Manawatū area for hundreds of years, thus have a deep connection to the life-giving resources of the land and waters within it. Kaitiakitanga is the inherent obligation and responsibility we have as tangata whenua of this area, to nurture and protect, restore, and enhance the mauri of our environment for future generations.

The Rangitāne o Manawatū Statutory Area of Interest is outlined in Figure 1 below and encompasses the area subject to draft Plan Change E.⁸ The statutory acknowledgements in the Rangitāne o Manawatu Claims Settlement Act 2016 include the Manawatū River and its Tributaries and the Oroua River. Ultimately our cultural and customary connection encompasses 440,000 ha of the plains divided by the Manawatū River and its tributaries and includes the town of Feilding and Manawatū District in its entirety.

⁸ The statutory area of interest comprises the area bordered by: a) to the north-west, a line from the southern bank of the mouth of the Rangitikei River inland to the Orangipango Trig near Ohingaiti, b) to the north, a straight line from the Orangipango Trig near Ohingaiti to Te Hekenga, c) to the south-east, a line following the ridge/summit along the Ruahine and Tararua ranges across to the Taramea Trig, d) to the south-west, a line from Taramea Trig westward to the mouth of the Manawatū River, e) to the west, a line around the coast from the mouth of the Manawatū River northward to the mouth of the Rangitikei River.

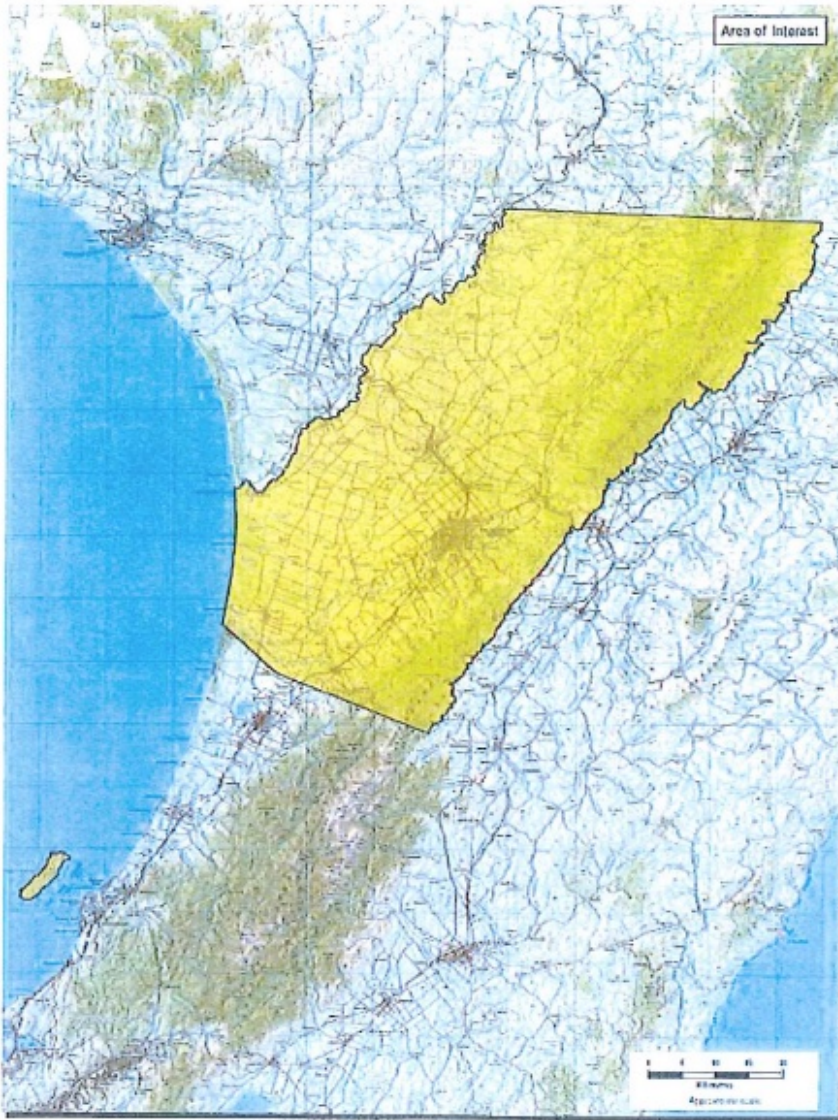


Figure 1 Rangitāne o Manawatū area of interest.

Rangitāne have developed a statement to describe what Te Mana o te Wai means within the Manawatū Catchment Freshwater Management Unit, which includes the Manawatū Awa and its catchment, including its tributaries, groundwater, wetlands and lagoons:

"The most significant quality that flows through wai is mauri. The mauri is generated throughout the catchment and is carried through the connected tributaries, groundwater, wetlands and lagoons. It is the most crucial element that binds the physical, traditional and spiritual elements of all things together, generating, nurturing and upholding all life, including that of Rangitāne o Manawatū. The health and well-being of Rangitāne is inseparable from the health and well-being of wai. The Manawatū Awa, its catchment, tributaries and

connections, wetlands and lagoons are taonga and valued for the traditional abundance of mahinga kai and natural resources.”

This statement is part of our iwi management plan and our connections are recognised as a matter of national importance under section 6e of the Resource Management Act 1991 ('the Act'), we expect Manawatū District Council to uphold our statement and connections in Plan Change E. We expand on this below.

COUNCIL'S STATUTORY OBLIGATIONS

The Council has a number of statutory duties under the Act with respect to how it provides for Rangitāne interests, obligations and connections with te taiao, in the preparation of Plan Change E. The following sections describe these obligations.

PART 2 MATTERS

When changing its district plan s74(1) requires the Council to change it in accordance with the provisions of Part 2 of the Act, which includes:

recognising and providing for:

"the relationship of Maori and their culture and traditions with their ancestral lands, waters, sites, wahi tapu, and other taonga" (s6e)

the protection of historic heritage from inappropriate subdivision, use, and development (s6f):⁹

having particular regard to:

kaitiakitanga (s7a), and

taking into account:

the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) (s8).

S74 AND S75 - PREPARING AND CHANGING A DISTRICT PLAN

Section 74 and 75 of the Act set out the matters to be considered and contents of a district plan.

⁹ The definition of 'historic heritage' includes 'sites of significance to Māori, including wāhi tapu'.

IWI PLANNING DOCUMENT

Firstly, section 74 (2A) requires Council to take into account the *Rangitāne o Manawātū Environmental Management Plan* ('EMP') when it prepares a change to the District Plan, where the content of the EMP "has a bearing" on the resource management issues covered by the change.¹⁰ In our view urban development, stormwater management, indigenous biodiversity, and climate change resilience will be relevant resource management issues that Plan Change E should cover.

The content of the EMP will be relevant to Plan Change E. It includes a number of principles and key outcomes, and ways these outcomes can be given effect to. Council will need to appropriately take into account the EMP in preparing Plan Change B. We draw the Council to outcomes around:

- Councils resource Rangitāne to participate meaningfully and early in Plan Change processes.
- Plan Changes by design are responsive to Rangitāne priorities.
- Rangitāne contribute to the choice of hearing panel members; panel members must be skilled in te mana o te wai and understand the Māori worldview.
- Rangitāne and Council work collaboratively to structure plan for future growth and appropriate use of local landscapes by employing ki uta ki tai.

NATIONAL POLICY STATEMENTS

Secondly, under s75(3) a district plan must give effect to any national policy statement and regional policy statement. Under s74(1) the Council is directed to change its district plan in accordance with a national policy statement. There are national policy statements relevant to Plan Change E that include direction around tangata whenua and resource management issues of interest to us. These include the National Policy Statements on Freshwater Management, Urban Development and Indigenous Biodiversity.

The National Policy Statement for Freshwater Management 2020 (NPS-FM) will be relevant because redevelopment of business land is an opportunity to implement stormwater management. It will be important for Rangitāne that the plan change incorporates objectives, policies and rules to leverage off this opportunity to improve stormwater quality and quantity entering the Makino Stream, Oroua River and Manawātū River and tributaries.

¹⁰ Section 74(2A)

The National Policy Statement on Urban Development includes objectives and policies around providing for cultural wellbeing, taking into account the principles of the Te Tiriti o Waitangi, and enabling Māori to express their cultural traditions and norms. Policy 9, for example, requires Council to involve Rangitāne in the preparation of Plan Change E. The Council must undertake effective consultation, and take into account Rangitāne values and aspirations for urban development. Plan Change E represents an opportunity to improve stormwater quality and quantity, increase indigenous biodiversity and ensure Feilding remains compact.

The National Policy Statement on Indigenous Biodiversity, which includes objectives and policies around providing for tangata whenua involvement around decision making maintaining indigenous biodiversity and increasing vegetation cover will also be relevant.

Council will need to seek advice from Rangitāne to give effect to these national policy statements and the regional policy statement in Plan Change E provisions.

SCHEDULE 1: PREPARATION, CHANGE, AND REVIEW OF POLICY STATEMENTS AND PLANS

During the preparation of a proposed plan change, the Council must consult the tangata whenua of the area who may be affected, through iwi authorities.¹¹

Schedule 1 Clause 3B provides more detail on the nature of that consultation.

Consultation is considered to have taken place if the Council:

- (a) considers ways in which it may foster the development of their capacity to respond to an invitation to consult; and*
- (b) establishes and maintains processes to provide opportunities for those iwi authorities to consult it; and*
- (c) consults with those iwi authorities; and*
- (d) enables those iwi authorities to identify resource management issues of concern to them; and*
- (e) indicates how those issues have been or are to be addressed.*

We suggest that Manawatū District Council take advice from TATEC on how to foster ways that can support Rangitāne o Manawatū to respond to this plan change process and

¹¹ Schedule 1, Clause 3(1)(d)

others and that process are established and maintained for plan change engagement going forward.

RANGITĀNE O MANAWATŪ STATUTORY ACKNOWLEDGMENTS

The statutory acknowledgements in the Rangitāne o Manawatu Claims Settlement Act 2016 require Council to provide Rangitāne o Manawatū with summaries of all resource consent applications that may affect the areas named in their acknowledgements, prior to decisions being made on those applications. The Manawatū River and its Tributaries statutory area (see Figure 1) encompasses the area subject to Plan Change E. The Oroua River is also part of our statutory acknowledgement and near the area subject to Plan Change E. Activities in the zone may affect the river and the plan change provisions will need to reflect this statutory acknowledgement.

GENERAL POSITION

Manawatū District Council must enable Rangitāne to actively participate in the plan change development. Council has obligations in preparing this change and we seek engagement with Council to discuss how these will be met in further development of the plan change.

Development and redevelopment of business land in Feilding is an opportunity to improve the mauri of wai and outcomes for Māori. TATEC are broadly supportive of redeveloping the provisions for the Town Centre and Multi Use Zones in the District Plan, as this provides opportunities to:

- Improve environmental outcomes including the quantity and quality of stormwater entering awa and increasing indigenous vegetation cover.
- Provide for Māori expression in Feilding.

Below we provide high level advice on the plan change and outcomes sought to inform our ongoing discussions and input. Detailed advice must come through a Cultural Impact Assessment, and iterative reviews, of the chapter as it develops.

IMPROVING THE MAURI OF WAI

As stated above, Rangitāne have a statutory acknowledgement over the Manawatū and Oroua awa within the Rangitāne o Manawatū Claims Settlement Act (2016). Water quality in both awa is poor and prevents us from interacting with wai and undertaking our cultural practices. This has an adverse impact on our cultural well-being.

Plan Change E should include strong policy direction to ensure that development in the Town Centre and Mixed Use Zones does not further degrade, rather, improves the health of the awa and their tributaries. This will enable Rangitāne to provide for our social, economic and cultural wellbeing, and provide opportunities to restore our connections with our ancestral waters and sites.

As currently drafted, there is no objective, policies and standards for managing stormwater.

MANAGEMENT OF STORMWATER AND CLIMATE CHANGE

TATEC are concerned about stormwater and the sensitivity of the receiving environment, particularly as our climate changes. Development in the Town Centre Zone and Mixed Use Zone is an opportunity to improve the stormwater quality and quantity entering our

awa particularly the Makino Stream and Oroua River and ensure our communities are resilient to climate change. TATEC will be seeking an integrated approach with nature-based solutions to stormwater.

As drafted, there are no stormwater or climate change-related objectives, policies, rules and standards. This is something we would be seeking to discuss with Council through participating in further development of the change.

PROVIDING FOR MĀORI CULTURAL EXPRESSION

Plan Change E should deliver an urban environment that enables Māori communities to provide for their social, economic and cultural wellbeing, and for their health and safety, both now, and in the future.

The plan change should enable Māori to express our cultural traditions and norms in the Town Centre and Mixed Use Zone. Feilding's current building patterns are based on colonial building and planning principles. Redevelopment is an opportunity for Māori to be represented in the urban form. TATEC are concerned that as drafted the objectives and policies will include direction around retaining existing amenity values. If a Māori development, like a marae and cultural centre for example, was proposed in the zones, the objectives, policies and rules as drafted would prevent this.

INFRASTRUCTURE READINESS AND IMPROVEMENTS

TATEC are concerned about the infrastructure-readiness of the zones. In addition to stormwater, wastewater is also a significant concern along with water availability. Growth and demand projections, and the resulting capacity assessments for the three waters will be key to our discussions and assessing our cultural values and effects.

Improving Feilding's transport, reserve and open space networks over time so they reduce contaminants in stormwater is also a key aspiration. This needs to be appropriately provided for in the provisions.

INCREASING INDIGENOUS BIODIVERSITY

In developing the plan change, it is imperative to increase and regenerate indigenous biodiversity in Feilding. Our taonga species' habitats have been affected by the drainage and deforestation of the Manawatū Plains and lack of green corridors in the District. Increasing vegetation in the town will be important for climate change resilience and improving stormwater quality too.

Presumably, the plan change will give effect to the National Policy Statement on Indigenous Biodiversity, which aims to maintain and improve indigenous biodiversity and vegetation cover.

The landscaping and screening standards are an opportunity to not only increase indigenous vegetation but also reduce impervious surfaces and store and treat stormwater. As drafted, they are solely for the purpose of visual amenity, which is too narrow.

LAND USES IN THE ZONES

TATEC are concerned about enabling service stations as a permitted activity. The Makino Stream adjoins the northern edge of the zone and stormwater from both zones enters the stream or Oroua River. Careful consideration should go into the location of service stations to ensure that they are not located in areas where overland flows could carry fuel and contaminants to our awa. Enabling service stations as a permitted activity removes this ability.

TATEC have concerns about providing for housing in the zones anywhere other than above ground level. Housing on the ground floor could lead to business land being taken up and result in the need to expand business zones down the line. TATEC want to see the town grow in a compact way to reduce environmental degradation.

CONCLUSION

Manawatū District Council must enable Rangitāne to actively participate in the plan change development. We suggest the next step, once Council have had the opportunity to read our feedback, is to meet to arrange how we can input into the next phases of the plan change's development.

From: [Make your mark Manawatu](#)
To: [MDC Submissions](#)
Subject: Proposed Plan Change Submission Form Form Submission
Date: Friday, 18 July 2025 11:11:25 am

002
E

Proposed Plan Change Submission Form Form Submission

There has been a submission of the form Proposed Plan Change Submission Form through your Make your mark Manawatu website.

Proposed Plan Change:

Proposed Plan Change E: Town Centre

First Name

Enviro NZ

Last Name

Services Ltd

Physical Address

[REDACTED]
[REDACTED]
[REDACTED]

Postcode

[REDACTED]

Postcode

[REDACTED]

Phone (day)

[REDACTED]

Email

Kaaren.rosser@environz.co.nz

I ____ gain an advantage in trade competition through this submission.
could not

I ___ directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

I am not.

This submission specifically relates to:

Please see attached submission. Appendix 2 will need to be emailed separately due to size of document over the threshold. Please advise email address to send to.

I have included additional pages.

- [Submission_to_Plan_Change_E_of_Manawatu_District_Plan_Enviro_NZ.pdf](#)

I seek the following decision from the Manawatū District Council.

Support or amend the provisions as per attached submission.

I ___ to be heard in support of this submission.

I wish to be heard.

If others make a similar submission I ___ consider presenting a joint case with them at a hearing.

I will

To view all of this form's submissions, visit

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ENVIRO NZ SERVICES LTD SUBMISSION ON THE MANAWATU DISTRICT PLAN – Plan Change E

Submitter Details:

1. Name: Enviro NZ Services Ltd (Enviro NZ)
2. Address for Service:
Postal: 

Email: kaaren.rosser@environz.co.nz
3. Contact Person: Kaaren Rosser
Environmental Planner
Laurence Dolan
Environmental Manager
4. Date of Feedback: 15 July 2025

Introduction:

5. Enviro NZ Services Limited (Enviro NZ) is the second-largest solid and liquid waste management company in New Zealand.
6. Enviro NZ owns and operates significant portions of the Country's waste management infrastructure including landfills, waste treatment facilities, recycling facilities and waste transfer facilities. Enviro NZ also provides waste and recycling collection services for Councils, businesses and households throughout New Zealand.
7. As a materials management and resource recovery company, Enviro NZ is committed to managing, recovering and processing waste streams to deliver sustainable outcomes. In the delivery of these outcomes, District Plans are important documents that need to allow for essential waste infrastructure in a city or district. They must ensure that appropriate and resilient infrastructure is provided for as the vulnerability of society to infrastructure short-comings can be severely detrimental to the economic, health and social well-being. As towns intensify, this is especially important. Where the density is increased, ensuring that there is sufficient and safe space for bin collection on the verge and providing sufficient on-site storage space is necessary to ensure that collection can be safely managed and a quality built environment outcome is achieved.
8. Enviro NZ operates waste, waste diversion, and recycling collection services within the Manawatu district.

Scope of Submission

9. This submission is provided on the proposed plan change for the Town Centre zoning review. In particular the submitter is focussed on the provisions that might affect waste management within the Mixed Use Zone and the Town Centre Zone Chapter.
10. Specific comments have been detailed in the table at **Appendix 1**.

General Comments on the Plan Change

11. In general, the submitter is supportive of the proposed provisions of Plan Change E, but where necessary seeks some inclusion or amendment of the provisions as they pertain to waste management within the Plan Change.
12. The government acknowledges that the way that waste is generated and disposed of in New Zealand needs to be addressed in order to minimise greenhouse gas emissions and be more sustainable. The national approach with regards to waste is focussed on shifting NZ to a circular economy. This direction is the focus of The New Zealand Infrastructure Strategy (*Rautaki Hanganga o Aotearoa 2022 – 2052 New Zealand Infrastructure Strategy (NZ Infrastructure Commission)*)¹ and the Waste and Resource Efficiency Strategy (*Ministry for the Environment, March 2025*)² focusses on reducing residual waste by keeping things in use as long as possible, then recycling.
13. To enable a circular economy, waste must be separated, collected and sorted and/or processed for re-use of the constituent materials. This requires sufficient bins on sites to allow for the separation at source.
14. Enabling residential activities in and around the town centre requires careful planning of all urban design elements to ensure that good design and functionality results. Apartments and mixed use developments need to have waste management areas designed at the resource consent stage given their complex footprint. While waste management areas should be located away from the building frontage and entrances, they need to be accessible (ideally no stairs) to all occupants and well-planned to accommodate the different waste streams produced on site. They also need to be easily accessed for collection trucks if on-site collection is proposed or accessible for kerbside collection.
15. It is considered that recent intensification undertaken in Auckland provides multiple examples where poorly thought-out waste design has had a big impact on the quality and functionality of intensive residential developments, and also led to unsafe street environments when pedestrians and cyclists cannot navigate around bins, along with difficulty for collection vehicles to pick up bins in a safe manner. Importantly, these issues arose even while the assessment criteria for more than 4 dwellings included 'having regard to waste collection and recycling facilities'. The Mixed Housing Zone assessment criteria at

¹ [rautaki-hanganga-o-aotearoa-new-zealand-infrastructure-strategy.pdf \(umbraco.io\)](https://www.umbraco.io/rautaki-hanganga-o-aotearoa-new-zealand-infrastructure-strategy.pdf)

² [Waste and resource efficiency strategy | Ministry for the Environment](#)

H5.8.2(2)(e)(iv) of the Auckland Unitary Plan (Operative in Part) ("AUP(OP)") refers to *"Provide the necessary waste collection and recycling facilities in locations conveniently accessible and screened from streets and public open spaces."*

16. Accordingly, Auckland and other districts are introducing a waste management standard for the higher density areas (under Plan Change 78 in Auckland). The Auckland rationale is explained in the extracts from the s32 report attached at **Appendix 2**. The conclusions from monitoring multi-unit developments is that the spatial and operational requirements for waste management need to be designed at the start of the development design process. Without minimum standards for waste management storage and collection, planners are left to decide what is appropriate, and this has often resulted in poor waste management facilities. Complaints from road users (pedestrians, cyclists, and vehicles and collection trucks), site occupants, and neighbouring properties occur when safety and amenity is being impacted from:
 - Too many bins blocking the footpath to allow safe pedestrian access;
 - Too many bins along the frontage to allow for safe collection of waste by the collection vehicle;
 - Inadequate bin storage on site in terms of physical space provided, leading to bins being located in common areas or within outdoor living spaces;
 - Poor on-site location of waste storage requiring negotiation of steep gradients, steps, or through buildings, to get bins to the kerb for collection.
17. Three examples of impacts on safety and amenity are provided below at Figures 1-3.





Figure 1 and 2 – bin locations forcing pedestrians to the carriageway and/or impeding bus entry and exit and waste pickup from collection vehicles



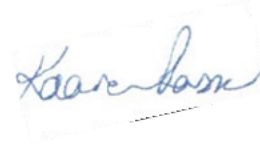
Figure 3: Bin storage needing stair access to get to the road frontage and not screened.

18. A waste management standard was also introduced in Auckland because inadequate waste storage provision directly impacts occupants' ability to properly separate and divert their waste. This issue has direct impacts on meeting the targets in the Manawatu Waste Management & Minimisation Plan and in reducing greenhouse gas emissions, particularly as an organic waste collection is proposed with a requirement for an additional bin.
19. Enviro NZ therefore supports the proposed waste management standards applying to residential units, papakainga housing, multi-unit developments and medium density development and visitor accommodation as outlined in **Appendix 1**. It will ensure that solid waste management is considered at the outset and what minimum standards the waste storage should be designed to.

Signed for and on behalf of EnviroNZ Services Ltd:



Laurence Dolan
Environmental Manager
MSc(Hons) Dip Nat Res



Kaaren Rosser
Environmental Planner
BSc, DipNatRes, CPlan, Assoc. NZPI

Appendix 1

Section of Proposed Plan	Support/ Oppose	Specific Text Identified	Relief Sought	Reasons
Plan Change E: Town Centre				
Definitions				
Solid Waste	Support	<i>Means the combination of domestic, commercial and industrial waste, including refuse and recyclable materials</i>		The definition is considered appropriate for the application of the zone standards.
MUZ - Mixed Use Zone				
MUZ-P7.4	Support	<i>Residential units, units within a multi-unit residential development, papakāinga housing and visitor accommodation in the Mixed Use Zone should:</i> <i>P7.4</i> <i>Provide sufficient, safe, on-site solid waste storage facilities in locations which avoid impeding accessways and onsite parking.</i>		This clause is supported as it will ensure that appropriate waste management facilities are designed at the outset of the development process.
MUZ-R1 - New buildings, including accessory buildings, and internal and external additions or alterations to an existing building	Support	<i>Activity Status: Permitted</i> <i>Where compliance is achieved with:</i> ... <i>MUZ-ST15 Residential Units, Multi-unit Residential Developments and Visitor Accommodation</i>		Achieving compliance with the proposed standard ST15 will ensure that waste management is adequately catered for within the mixed use zone.
MUZ-R1.2 Matters of Discretion	Support with amendments	<i>Activity Status: Restricted Discretionary</i> <i>Where compliance is not achieved with any of the standards in MUZ-R1.1</i> <i>Matters of Discretion:</i> <i>MUZ-MD1 The effect of the non-compliance with the relevant standards that is not met.</i> <i>MUZ-MD6 Screening of outdoor storage areas from the street and properties adjoining the site.</i> ... <i>MUZ-MD8 Adequacy of residential unit and visitor accommodation noise insulation and ventilation</i>	<i>Activity Status: Restricted Discretionary</i> <i>Where compliance is not achieved with any of the standards in MUZ-R1.1</i> <i>Matters of Discretion:</i> <i>MUZ-MD1 The effect of the non-compliance with the relevant standards that is not met.</i> <i>MUZ-MD6 Screening of outdoor storage areas from the street and properties adjoining the site.</i> ... <i>MUZ-MD8 Adequacy of residential unit and visitor accommodation noise insulation, and ventilation and solid waste management</i>	The additional text will ensure that the provision of waste management is given some focus in the matters of discretion aside from MD1 and MD6, as the waste management standard includes other considerations such as size and illumination.
MUZ-R3 Residential activities, papakāinga housing, multi-unit residential developments, visitor accommodation and home businesses	Support	<i>Activity Status: Permitted</i> <i>Where compliance is achieved with:</i> ... <i>MUZ-ST15 Residential Units, Multi-unit Residential Developments and Visitor Accommodation</i>		Achieving compliance with the proposed standard ST15 will ensure that waste management is adequately catered for within the Mixed Use zone where residential activities are proposed.

MUZ-R3.2 Matters of Discretion	Support	<i>Activity Status: Restricted Discretionary Where compliance is not achieved with any of the standards in MUZ-R3.1 Matters of Discretion:</i> <i>MUZ-MD26 The effect of the non-compliance with the relevant standard that is not met.</i> <i>MUZ-MD31 Adequacy of residential unit, unit within a multi-unit residential development and visitor accommodation noise insulation and ventilation and solid waste management</i> 		The proposed matter of discretion at MD31 is supported as this will ensure that non-compliance with the waste management standard is given appropriate attention.
MUZ-ST15.5	Support with amendments	<i>Residential waste management area – multi-unit residential developments must provide onsite solid waste management storage spaces as follows:</i> <i>MUZ-ST15.5a</i> <i>Storage space of 1.5m2 per residential unit either for individual or communal collection</i> <i>MUZ-ST15.5b</i> <i>The onsite waste management area must be illuminated for the safety of users.</i> <i>MUZ-ST15.5c</i> <i>Bins stored onsite must be screened from sight from the street and adjacent residential areas</i> <i>MUZ-ST15.5d</i> <i>Bins must be externally located with direct access to the street and must not encroach on areas used for onsite parking and access.</i>	<i>Residential waste management area – multi-unit residential developments must provide onsite solid waste management storage spaces as follows:</i> <i>MUZ-ST15.5a</i> <i>Storage space of 1.5m2 per residential unit either for individual or communal collection.</i> <i>MUZ-ST15.5b</i> <i>The onsite waste management area must be illuminated for the safety of users.</i> <i>MUZ-ST15.5c</i> <i>Bins stored onsite must be screened from sight from the street and adjacent residential areas <u>activities</u>.</i> <i>MUZ-ST15.5d</i> <i>Bins must be externally located with direct access to the street, <u>accessible to users</u> and must not encroach on areas used for onsite parking and access.</i>	The standard is supported as the Mixed Use zone is often populated by multi-unit residential developments for which, unless waste management is designed for at the start, leads to reduced outcomes for the health and safety of residents, surrounding amenity, and the ability to separate and recycle waste. Failing to provide for waste storage at the outset also increases the ongoing running costs of a development as for example if designed undersize will require more frequent refuse collections at greater cost. The only amendments considered necessary is screening bins in relation to residential activities rather than areas as the word 'areas' is ambiguous and may be interpreted as zoning rather than neighbouring activities which include residential. It is also important that the bin location is accessible to users.
TCZ – Town Centre Zone				
TCZ-P3.6	Support	<i>Residential units, units within a multi-unit residential development and visitor accommodation in the Town Centre Zone should:</i> ... <i>TCZ-P3.6 Provide sufficient, safe, on-site waste storage facilities to avoid accessways and onsite parking being impeded</i>		This policy is supported to ensure that solid waste storage is designed at the outset and managed. Conversions of existing buildings will ensure that their waste storage location is in the right place, at the right size for the development, rather than not considered.
TCZ-R2.1 Residential activities, papakāinga housing, visitor accommodation and multi-unit residential developments	Support	<i>Activity Status: Permitted Where compliance is achieved with:</i> <i>TCZ-ST3 – Screening</i> <i>TCZ-ST14 – Residential units, Multi-unit Residential Developments and Visitor Accommodation</i>		Achieving compliance with the proposed standard ST14 will ensure that waste management is adequately catered for within the Town Centre zone.
TCZ-R2.2 TCZ-MD11	Support	<i>Activity Status: Restricted Discretionary Where compliance is not achieved with any of the standards in TCZ-R.2.1 Matters of Discretion:</i> ... <i>TCZ-MD8 Noise, including hours of operation</i> 		The matter of discretion MD11 will ensure that the provision of solid waste management is considered in the design of dwellings in the Town Centre Zone.

		TCZ-MD11 Adequacy of residential unit, unit within a multi-unit residential development and papakāinga housing noise insulation, ventilation and solid waste management storage		
TCZ-R3.1 New buildings, accessory buildings, and exterior alterations or additions to existing buildings	Support	Activity Status: Permitted Where compliance is achieved with: TCZ-ST1 – Height and Height in Relation to Boundary ... TCZ-ST14 – Residential units, Multi-unit Residential Developments and Visitor Accommodation		Achieving compliance with the proposed standard ST14 will ensure that solid waste management is adequately catered for within the town centre zone.
TCZ-R3.2	Support with amendments	Activity Status: Restricted Discretionary Where compliance is not achieved with any of the standards in TCZ-R.3.1 Matters of Discretion TCZ-MD16 The effect of the non-compliance with the relevant standard that is not met. ...	Activity Status: Restricted Discretionary Where compliance is not achieved with any of the standards in TCZ-R.3.1 Matters of Discretion TCZ-MD16 The effect of the non-compliance with the relevant standard that is not met. ... <u>TCZ-MD28 Adequacy of communal spaces and servicing areas and access to them.</u>	There does not appear to be any matters of discretion regarding how the building meets the needs of the occupants in terms of access and servicing. This would include solid waste management.
TCZ-ST13.6 Residential Waste Management Area	Support	Residential waste management area – multi-unit residential developments must provide onsite solid waste management storage spaces as follows: TCZ-ST13.6a Storage space of 1.5m ² per residential unit either for individual or communal collection. TCZ-ST13.6b The onsite waste management area must be illuminated for the safety of users. TCZ-ST13.6c Bins stored onsite must be screened from sight from the street and adjacent residential areas. TCZ-ST13.6d Bins must be externally located with direct access to the street and must not encroach on areas used for onsite parking and access	Residential waste management area – multi-unit residential developments must provide onsite solid waste management storage spaces as follows: TCZ-ST13.6a Storage space of 1.5m ² per residential unit either for individual or communal collection. TCZ-ST13.6b The onsite waste management area must be illuminated for the safety of users. TCZ-ST13.6c Bins stored onsite must be screened from sight from the street and adjacent residential areas <u>activities</u> . TCZ-ST13.6d Bins must be externally located with direct access to the street, <u>accessible to users</u> and must not encroach on areas used for onsite parking and access	Waste collection in Town Centres is usually undertaken by private collection companies from a communal waste storage area on site. However, waste generated by residential units needs specific consideration as this needs to be sized and located appropriately for easy resident access. While there are other factors that result in favourable design of waste storage areas, the standard proposed provides for minimum standards to ensure that waste management is considered at the design stage. The reason for the proposed amendments is as stated above for the Mixed Use Zone.

From: [Make your mark Manawatu](#)
To: [MDC Submissions](#)
Subject: Proposed Plan Change Submission Form Form Submission
Date: Sunday, 13 July 2025 10:22:31 pm

003
E

Proposed Plan Change Submission Form Form Submission

There has been a submission of the form Proposed Plan Change Submission Form through your Make your mark Manawatu website.

Proposed Plan Change:

Proposed Plan Change E: Town Centre

First Name

lisa

Last Name

Poulsen

Physical Address

[REDACTED]
[REDACTED]
[REDACTED]

Postcode

[REDACTED]

Phone (day)

[REDACTED]

Email

lisamikep@inspire.net.nz

I ____ gain an advantage in trade competition through this submission.
could not

I ____ directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

I am not.

My submission is:

I support the specific provisions in this plan change. It reflects changing needs of the community and the need to balance some people wanting smaller living spaces. Room is still left for those wishing to be close to town on larger sections.

I ____ to be heard in support of this submission.

I do not wish to be heard.

If others make a similar submission I ____ consider presenting a joint case with them at a hearing.

I will not

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To: [MDC Submissions](#)
Subject: Proposed Plan Change Submission Form Form Submission
Date: Thursday, 26 June 2025 1:45:28 pm

004
E

Proposed Plan Change Submission Form Form Submission

There has been a submission of the form Proposed Plan Change Submission Form through your Make your mark Manawatu website.

Proposed Plan Change:

Proposed Plan Change E: Town Centre

First Name

Chris

Last Name

DUNGAN

Physical Address

[REDACTED]

Postcode

4702

Address for service

[REDACTED]

Postcode

4702

Phone (day)

[REDACTED]

Mobile

[REDACTED]

Email

chrisdungan@xtra.co.nz

I ____ gain an advantage in trade competition through this submission.
could not

I ____ directly affected by an effect of the subject matter of the submission that adversely affects the environment and does not relate to trade competition or the effects of trade competition.

I am not.

My submission is:

I agree 100% with the plan ammendment

I ____ to be heard in support of this submission.

I do not wish to be heard.

To view all of this form's submissions, visit

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005

Proposed Plan Change Submission Form

Manawātū District Plan

This is a submission on the following proposed plan change proposed to the Manawātū District Plan

Proposed Plan Change: Plan Change E Feilding Town Centre

Submitter Details

*Full name Neoteric Developments Limited

Physical address

[Redacted]

[Redacted]

Postcode

[Redacted]

*Address for service

(if different from above)

[Redacted]

Attn:

[Redacted]

*Postcode

[Redacted]

Phone (day)

.....

*Mobile

[Redacted]

Email

mike@commbuild.co.nz and ehilson@propertygroup.co.nz

Fields marked with a '*' are mandatory

Declarations

1. I could/could not [circle one] gain an advantage in trade competition through this submission.
2. I am/am not [circle one] directly affected by an effect of the subject matter of the submission that—
 - a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition.

Submission Details

This submission specifically relates to [please give details, including quoting reference or number of the provision]]

Please see attached submission.

My submission is: [Summarise the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons]

Please see attached submission.

I/we have included 2 additional pages

I/we seek the following decision from the Manawātū District Council *[give precise details, use additional pages if required]*

Please see attached submission.

Presenting at hearings

I/we **wish to be heard / do not wish to be heard** *[circle one]* in support of this submission.

If others make a similar submission I **will / will not** *[circle one]* consider presenting a joint case with them at a hearing.

Signature

Signed pp. *E. Kilgallon*

Signed

Date 16/07/2025

Date

Important information

Send or deliver your feedback to:

District Plan Submissions
Manawātū District Council
Private Bag 10 001, Feilding 4743
135 Manchester Street, Feilding

submissions@mdc.govt.nz

Hand deliver to:

Customer Service Centre
Manawātū District Council
135 Manchester Street
Feilding 4702

Note: If this is closed please visit the Makino Aquatic Centre

For enquiries:

phone: 06 323 0000

email: districtplanreview@mdc.govt.nz

The content of this submission will be public. In order to satisfy requirements of clause 8A of Schedule 1 to the Resource Management Act 1991, the names of submitters and their address for service (email or postal address) will be made available to those wishing to make a further submission in support or opposition. Other personal information will be withheld.

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16 July 2025
Our Job no. 719866

District Plan Review
Manawatū District Council
Private Bag 10001
Feilding 4743

Via Email: submissions@mdc.govt.nz

To: The District Plan Review Team

Submission on Proposed Plan Change E: Feilding Town Centre – Under Clause 6 of the First Schedule, Resource Management Act

Submitter Details

Full Name	The Property Group on behalf of Neoteric Developments Ltd
Address for Service	Neoteric Developments Ltd [REDACTED]
Email	mike@commbuild.co.nz

1. Introduction

- 1.1. This submission is made on behalf of Neoteric Developments Limited ('**Neoteric**') on Proposed Plan Change E – Feilding Town Centre ('**PCE**'), a plan change to the Manawatū District Plan.
- 1.2. Neoteric are a significant landowner in the Feilding Town Centre including the former New World/Farmers Co-op and some properties along Manchester Street.

2. Submission Details

- 2.1. Neoteric supports the plan change in its entirety as notified.
- 2.2. In particular, Neoteric support:
 - 2.2.1. The reduction of the Town Centre Zone and the expansion of the Mixed Use Zone.
 - 2.2.2. Residential and visitor accommodation in the Town Centre and Mixed Use Zones as permitted activities.

- 2.2.3. The enabling framework for a variety of appropriate activities within the Mixed Use Zone which can contribute to the vitality and vibrancy of Feilding's Town Centre.

3. What is being sought through the submission

- 3.1. Neoteric seek that the plan change is retained as notified.

4. Reasons

- 4.1. Neoteric support the Plan change in its entirety for the reasons outlined below.

- 4.2. The Plan Change:

- Achieves the purpose of the Resource Management Act 1991;
- Is the most appropriate option under s32 of the RMA;
- Gives effect to relevant national planning documents including the National Policy Statement for Freshwater Management 2020; and the National Policy Statement for Urban Development 2020; and
- Gives effect to the Horizons One Plan (Regional Policy Statement).

5. Conclusion

- 5.1. Neoteric generally supports the plan change and seek it is retained as notified.
- 5.2. Neoteric wishes to be heard in support of its submission.
- 5.3. Neoteric would not gain a trade competition advantage through this submission.
- 5.4. We would welcome an opportunity to meet with Council staff and representatives to discuss the submission in further detail.

Prepared by:



Emma Hilson

Planning Consultant



Peer reviewed by:



Ryan O'Leary

Central Planning Manager



006

Proposed Plan Change Submission Form

Manawātū District Plan

This is a submission on the following proposed plan change proposed to the Manawātū District Plan

Proposed Plan Change: E.....

Submitter Details

*Full name KiwiRail Holdings Limited.....

Physical address [redacted]
Postcode 6140.....

*Address for service
(if different from above)
*Postcode 6140.....

Phone (day) *Mobile [redacted]

Email sheena.mcguire@kiwirail.co.nz.....

Fields marked with a '*' are mandatory

Declarations

1. I could not [circle one] gain an advantage in trade competition through this submission.
2. I am not [circle one] directly affected by an effect of the subject matter of the submission that—
 - a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition.

Submission Details

This submission specifically relates to [please give details, including quoting reference or number of the provision]]

See attached.

My submission is: [Summarise the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made, giving reasons]

See attached.

I have included additional pages

I/we seek the following decision from the Manawātū District Council *[give precise details, use additional pages if required]*

See attached.

Presenting at hearings

I/we **wish to be heard** *[circle one]* in support of this submission.

If others make a similar submission I **will** *[circle one]* consider presenting a joint case with them at a hearing.

Signature

Signed SM

Signed

Date 17/07/2025.....

Date

Important information

Send or deliver your feedback to:

District Plan Submissions
Manawātū District Council
Private Bag 10 001, Feilding 4743
135 Manchester Street, Feilding

submissions@mdc.govt.nz

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For enquiries:

phone: 06 323 0000

email: districtplanreview@mdc.govt.nz

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17 July 2025

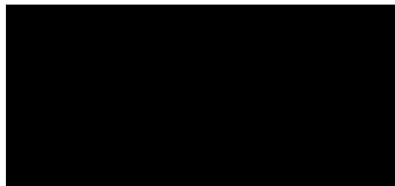
Manawātū District Council
Private Bag 10001
FEILDING 4702

By email: submissions@mdc.govt.nz

SUBMISSION ON MANAWATŪ DISTRICT COUNCIL – PROPOSED PLAN CHANGE E

NAME OF SUBMITTER: KiwiRail Holdings Limited (KiwiRail)

ADDRESS FOR SERVICE:



Attention: Sheena McGuire



Email: Sheena.McGuire@kiwirail.co.nz

KiwiRail submission on Proposed Plan Change E

KiwiRail Holdings Limited (KiwiRail) is the State-Owned Enterprise responsible for the construction, maintenance, and operation of the national railway network. This includes managing railway infrastructure and land, as well as rail freight and passenger services within New Zealand. KiwiRail is also the Requiring Authority for land designated for 'Railway Purposes' (or similar) in District Plans throughout New Zealand.

KiwiRail's national railway network (which comprises of 3,700km of track, over 200 locomotives, 18,100 hectares of land and 1,350 modern and heritage buildings)¹ is a nationally and regionally significant infrastructure asset. The rail network is critical to the safe and efficient movement of freight and passengers throughout New Zealand, and forms an essential part of the national transportation network and the wider supply chain. New Zealanders have invested significantly in the rail network and it is a critical public asset.

The North Island Main Trunk (NIMT) extends through the Manawātū District. The NIMT forms a key part of the KiwiRail network nationally. KiwiRail seeks to protect its ability to operate, maintain and upgrade rail assets into the future. KiwiRail holds a designation for a Regional Freight Hub located on the NIMT within Palmerston North City near Bunnythorpe, signalling a commitment to invest in the region and increasing the potential for freight train traffic in Manawātū.

To achieve this, KiwiRail encourages land uses near the railway corridor that do not compromise the short or long-term ability to operate a safe and efficient rail network, both day and night. Where sensitive

¹

Half Year Annual Report 2022 and Unaudited Financial Statements for the Six Months Ended 31 December 2021 (KiwiRail, 2022) at page 5.



activities are proposed on land near the railway corridors, appropriate controls should be imposed to ensure the long-term amenity of sensitive uses. Associated with that is the risk of objections and complaints leading to restraints on the operation, maintenance and enhancement of the rail corridor. Safety is a key concern for KiwiRail so ensuring sightlines and level crossings are protected is also crucial.

KiwiRail's submission on Proposed Plan Change E is set out in the attached table. The comments largely follow the structure of the Plan but there are some areas where comments are grouped into topic or issue areas. In terms of relief sought, insertions are marked in **bold** and underlined, while any recommended deletions of text are shown in *italics* and ~~struck out~~. All requested changes include any consequential changes to the Plan to link and/or accommodate the requested change in the stated, or alternate location.

The focus of KiwiRail's submission has been on the Mixed Use Zone provisions as the Town Centre Zone is approximately 100m away from the rail corridor.

KiwiRail is available to meet with the Council to discuss any elements of the submission points provided within this table, to provide any clarification that may assist in decisions on the changes requested.

KiwiRail could not gain an advantage in trade competition through this submission.

Regards,



Sheena McGuire
Senior RMA Advisor
KiwiRail Holdings Limited

Feedback Number	Section of Plan	Specific Provision	Support/Oppose/ Seek Amendment	Reasons for Feedback	Relief Sought (as stated or similar to achieve the requested relief)
1.	Definitions + Planning maps	Rail Corridor Noise Control Area	Add new	KiwiRail seeks the inclusion of a Rail Corridor Noise Control Area Overlay on the planning maps to show the area potentially affected by noise between a railway corridor boundary and a distance of 100m. In addition to the overlay, KiwiRail seeks an accompanying definition to assist with the interpretation and application of the proposed railway line noise insulation standards. See enclosed Section 32 Report which supports the inclusion of rail noise mitigation.	Add overlay to planning maps. Add definition as follows: <u>Rail Corridor Noise Control Overlay means the area potentially affected by noise between a railway corridor boundary and a distance of 100m. Rail Corridor Noise Control Overlay shown on the planning maps identifies areas that have the potential to experience high noise levels from rail traffic. New buildings and alterations to habitable rooms in buildings used for sensitive land uses are required to demonstrate that adverse noise effects have been appropriately managed by demonstrating compliance with the standards specified for the Mixed Use Zone.</u>
2.	Definitions + Planning maps	Rail Vibration Alert Area	Add new	KiwiRail seeks the inclusion of a Rail Vibration Alert Area Overlay on the planning maps to show the area potentially affected by vibration between a railway corridor boundary at the distance of 60 meters either side of the rail corridor boundary. In addition to the overlay, KiwiRail seeks an accompanying definition that outlines the extent and purpose of the overlay. See enclosed Section 32 Report which supports the inclusion of a rail vibration alert.	Add overlay to planning maps. Add definition as follows: <u>Rail Vibration Alert Area Overlay means the area potentially affected by vibration between a railway corridor boundary and a distance of 60m.</u>
3.	Introduction		Seek amendment	KiwiRail supports a range of uses within the Mixed Use Zone, including noise sensitive activities such as new dwellings and tourist accommodation. It is requested that the Introduction be amended to refer to the need to manage reverse sensitive effects and that noise sensitive activities 100m of the North Island Main Trunk Line could be affected by railway noise and vibration.	Amend as follows: <u>The Mixed Use Zone adjoins the North Island Main Trunk Line and reverse sensitivity effects on the rail corridor need to be managed. A Rail Corridor Noise Control Area identifies the area potentially effected by rail noise and where controls apply to ensure that occupants have a suitable level of internal amenity, without constraining the existing or future operation of established rail network.</u>
4.	Objectives	MUZ-O4 MUZ-O6 (New)	Seek amendment	KiwiRail generally supports the intent of this objective to avoid or mitigate adverse effects on the rail network. However, the objective fails to identify that safety effects can arise from not only noise sensitive activities being located within close proximity to the corridor. Other activities such as commercial or industrial uses may involve the construction or alteration of a building adjacent to the corridor which, without appropriate setbacks, may pose a threat to the safety of people when constructing and maintaining the building, as well as a threat to the safe and efficient operation of the rail network. KiwiRail seeks amendment to make a distinction between reverse sensitivity effects and safety effects on the rail network so all effects are managed effectively.	Amend MUZ-O4 as follows: Adverse reverse sensitivity, ~~safety~~, health and wellbeing effects arising from the development of noise sensitive activities ~~adjoining, or in close proximity to, the railway network~~ <u>within the Rail Corridor Noise Control Overlay</u> are appropriately avoided or mitigated. Add new <u>MUZ-O6</u> as follows: <u>Adverse safety effects and risk of disruption to the safe and efficient operation of the rail network arising from activities adjoining, or in close proximity to, the rail network are appropriately avoided or mitigated.</u>
5.	Policies	MUZ-P9.1	Support	KiwiRail supports this policy which requires a setback between the rail corridor and buildings and structures. Building setbacks are an effective tool to provide a safety buffer between the operational rail corridor and adjoining land uses.	Retain as proposed
6.		MUZ-P9.2	Seek amendment	KiwiRail supports policy which requires appropriate noise insulation for noise sensitive activities locating adjacent to the rail corridor. KiwiRail seeks amendment to apply this to the requested Rail Corridor Noise Control Overlay.	Amend as follows: If containing noise sensitive activities <u>within the Rail Corridor Noise Control Overlay</u>, should be located in a position or at distance from the railway, or have noise insulation sufficient, to reduce noise in habitable rooms to levels which do not adversely affect the health of occupants.
7.		MUZ-P10	Support	KiwiRail supports policy to avoid or minimise adverse effects from stormwater on surrounding land. KiwiRail does not accept stormwater discharge from	Retain as proposed

Feedback Number	Section of Plan	Specific Provision	Support/Oppose/ Seek Amendment	Reasons for Feedback	Relief Sought (as stated or similar to achieve the requested relief)
				neighbouring properties which could undermine the safe and efficient operation of the rail corridor.	
8.	Rules	MUZ-R1.1	Support in part	KiwiRail supports the Permitted Activity status of new buildings and alterations subject to compliance with MUZ-ST2, MUZ-ST10, MUZ-ST11, MUZ-ST16 and MUZ-ST17. If compliance cannot be achieved with these standards, KiwiRail supports the Restricted Discretionary Activity status.	Retain as proposed
9.		MUZ-R1.2 New matter of discretion	Seek amendment	As Council is only able to consider specified matters of discretion for resource consents with a Restricted Discretionary activity status, it is important that these matters cover all relevant considerations. The current list of matters of consideration do not explicitly provide for the consideration of how new development may affect reverse sensitive effects on the rail network or the outcome of any consultation with KiwiRail. KiwiRail acknowledges that MUZ-MD12 and MUZ-MD14 address in part some of KiwiRail's concerns in terms of considering the effects on the safety and efficiency of the rail corridor, building setbacks and noise attenuation. However, KiwiRail seeks a new rail-specific matter to ensure the potential effects on rail are adequately assessed.	Add new matter as follows: <u>MUZ-MD...</u> a) <u>The extent to which the building design, location and setback compromise the safe and efficient function and operation of the rail network.</u> b) <u>The reverse sensitivity effects on the rail network, including the extent to which the activity will unduly constrain the ongoing operation, maintenance and upgrade of the rail network.</u> c) <u>The outcome of any consultation with KiwiRail Holdings Limited.</u>
10.		MUZ-R1.3	Support	KiwiRail's typical approach to address reverse sensitivity effects is to allow for noise sensitive activities within the Rail Corridor Noise Control Overlay (100m of the rail corridor), provided there are adequate provisions requiring effective noise insulation. Whilst we seek a 5m building setback, this is for safety to allow occupants to maintain and access their buildings without accessing the rail corridor or getting too close to trains. KiwiRail don't object to the Discretionary Activity status of new buildings containing noise sensitive activities within 30m of the nearest edge of the railway track. However, we note that amendments recommended within this submission also address our concerns relating to reverse sensitivity and safety.	Retain as proposed
11.		MUZ-R2	Support	KiwiRail supports the permitted activity status of Commercial Services, Entertainment Facilities, Retail Activities, Large Format Retail Activities, Supermarkets, Funeral Parlours and Ancillary Activities, subject to compliance with rail setback, visibility at level crossings and vehicle crossing setback standards.	Retain as proposed
12.		MUZ-R2.2 MUZ-MD23	Seek amendment	KiwiRail supports this matter of discretion which requires consideration for the effects on the safety and efficiency of the transport network. KiwiRail seeks amendment to encourage applicants to consult KiwiRail if there is a non-compliance.	Amend as follows: Effects on the efficient and safe operation of the transportation network <u>and the outcome of any consultation with KiwiRail Holdings Limited.</u>
13.		MUZ-R3.1	Seek amendment	KiwiRail supports the permitted activity status of Residential activities, papakāinga housing, multi-unit residential developments, visitor accommodation and home businesses subject to compliance with visibility at level crossings, access and rail noise insulation standards. However, KiwiRail notes there is no setback requirement. KiwiRail seeks the inclusion of the requirement to comply with MUZ-ST2 – Setbacks. Council has applied this setback requirement to other activities and KiwiRail seeks to ensure it is applied to Residential activities, papakāinga housing, multi-unit residential developments, visitor accommodation and home businesses as well. Setbacks are a common planning tool used to ensure the safe and efficient operation of activities such as the railway corridor, particularly when it may come into conflict with adjacent land uses. In the case of rail, a setback provides a safe	Amend as follows: MUZ-R3.1 Activity Status: Permitted Where compliance is achieved with: <u>MUZ-ST2 – Setbacks</u> MUZ-ST8 – Noise ...

Feedback Number	Section of Plan	Specific Provision	Support/Oppose/ Seek Amendment	Reasons for Feedback	Relief Sought (as stated or similar to achieve the requested relief)
				physical distance between a building and the railway corridor boundary. Heavy freight trains run on the railway lines through the Manawātū District, and are unable to stop quickly, with freight trains often taking one kilometer to come to a complete stop. A 5m setback ensures that people can use and maintain their land and buildings safely without needing to encroach into the railway corridor, minimising the risks of physical interference on railway operations. A 5m setback provides space for the placement and dismantling of scaffolding, as well as mechanical access. This distance is especially important for multi-storey buildings. Proposed standard MUZ-ST1.1 establishes a maximum permitted height of 12m, which allows for buildings up to 3-4 stories high. Without a sufficient setback, people painting their buildings, clearing gutters or undertaking other types of maintenance activities above ground level, may need to access the rail corridor. If a person or object (e.g. poles and ladders) encroaches onto the rail corridor without authorisation, there is a substantial risk of injury or death. A setback control has obvious safety benefits for the users of the land adjoining the rail corridor and users of the rail corridor. It also has efficiency benefits for rail operations, by mitigating against the risk of train services being interrupted by unauthorised persons or objects entering the rail corridor. KiwiRail is concerned that without appropriate setback requirements, there is significant risk of adverse health and safety effects impacting people locating in proximity to the railway corridor. Whilst KiwiRail acknowledges that adjacent landowners require a 'Permit to Enter' from KiwiRail to legally enter the rail corridor, this legal requirement does not prevent all unauthorised access onto the rail corridor. The most efficient and effective means of ensuring that adjacent development does not interfere with the efficient and safe operation of the rail network is to require a setback from the boundary with the rail corridor. This setback reduces the adjoining landowners' likelihood of innocently accessing the rail corridor, reduces the risk of impact by train or the need for landowners to follow the 'Permit to Enter' process to carry out standard maintenance. KiwiRail seeks this rule requires compliance with MUZ-ST2. KiwiRail has provided the Section 32 Report on Setbacks.	
14.		MUZ-R3.2 New matter of discretion	Seek amendment	As Council is only able to consider specified matters of discretion for resource consents with a Restricted Discretionary activity status, it is important that these matters cover all relevant considerations. The current list of matters of consideration do not explicitly provide for the consideration of how new development may affect reverse sensitive effects on the rail network or the outcome of any consultation with KiwiRail. KiwiRail acknowledges that MUZ-MD34 and MUZ-MD36 address in part some of KiwiRail's concerns in terms of considering the effects on the safety and efficiency of the rail corridor, building setbacks and noise attenuation. However, KiwiRail seeks a new rail-specific matter to ensure the potential effects on rail are adequately assessed.	Add new matter as follows: <u>MUZ-MD...</u> a) <u>The extent to which the building design, location and setback compromise the safe and efficient function and operation of the rail network.</u> b) <u>The reverse sensitivity effects on the rail network, including the extent to which the activity will unduly constrain the ongoing operation, maintenance and upgrade of the rail network.</u> c) <u>The outcome of any consultation with KiwiRail Holdings Limited.</u>
15.		MUZ-R7	Support	KiwiRail supports the permitted activity status of community facilities, tourist facilities and education facilities, subject to compliance with rail setback, visibility at level crossings, access and rail noise insulation standards.	Retain as proposed
16.		MUZ-R7.2 New matter of discretion	Seek amendment	As Council is only able to consider specified matters of discretion for resource consents with a Restricted Discretionary activity status, it is important that these matters cover all relevant considerations. The current list of matters of consideration do not explicitly provide for the consideration of how new	Add new matter as follows: <u>MUZ-MD...</u> a) <u>The extent to which the building design, location and setback compromise the safe and efficient function and operation of the rail network.</u>

Feedback Number	Section of Plan	Specific Provision	Support/Oppose/ Seek Amendment	Reasons for Feedback	Relief Sought (as stated or similar to achieve the requested relief)
				development may affect reverse sensitive effects on the rail network or the outcome of any consultation with KiwiRail. KiwiRail acknowledges that MUZ-MD49 and MUZ-MD50 address in part some of KiwiRail's concerns in terms of considering the effects on the safety and efficiency of the rail corridor, building setbacks and noise attenuation. However, KiwiRail seeks a new rail-specific matter to ensure the potential effects on rail are adequately assessed.	b) <u>The reverse sensitivity effects on the rail network, including the extent to which the activity will unduly constrain the ongoing operation, maintenance and upgrade of the rail network.</u> c) <u>The outcome of any consultation with KiwiRail Holdings Limited.</u>
17.		MUZ-R8.1	Support	KiwiRail supports the permitted activity status of motor vehicle sales and services, subject to compliance with rail setback, visibility at level crossings and vehicle crossing setback standards.	Retain as proposed
18.		MUZ-R8.2 MUZ-MD60	Seek amendment	KiwiRail supports this matter of discretion which requires consideration for the effects on the safety and efficiency of the transport network. KiwiRail seeks amendment to encourage applicants to consult KiwiRail if there is a non-compliance.	Amend as follows: Effects on the efficient and safe operation of the transportation network <u>and the outcome of any consultation with KiwiRail Holdings Limited.</u>
19.		MUZ-R9	Support	KiwiRail supports the permitted activity status of light industry, subject to compliance with rail setback, visibility at level crossings and vehicle crossing setback standards.	Retain as proposed
20.		MUZ-R9.2 MUZ-MD72	Seek amendment	KiwiRail supports this matter of discretion which requires consideration for the effects on the safety and efficiency of the transport network. KiwiRail seeks amendment to encourage applicants to consult KiwiRail if there is a non-compliance.	Amend as follows: Effects on the efficient and safe operation of the transportation network <u>and the outcome of any consultation with KiwiRail Holdings Limited.</u>
21.		MUZ-R10.1	Support	KiwiRail supports the permitted activity status of service stations, subject to compliance with rail setback, visibility at level crossings and vehicle crossing setback standards.	Retain as proposed
22.		MUZ-R10.2 MUZ-MD79	Seek amendment	Where compliance with MUZ-R10.1 cannot be achieved, KiwiRail supports matter of discretion MUZ-MD79 which requires consideration of the effects on the efficient and safe operation of the transport network. KiwiRail seeks amendment to encourage applicants to engage KiwiRail on any non-compliances relating to rail setbacks or safety at level crossings.	Amend as follows: Effects on the efficient and safe operation of the transportation network <u>and the outcome of any consultation with KiwiRail Holdings Limited.</u>
23.		MUZ-R11	Support	KiwiRail supports that saleyards are only permitted within All DP 3797, All DP 6178, and Lots 145, 152, 153, 154, Pt Lot 146 DP 19. This land does not adjoin the corridor and is sufficiently setback from the railway line.	Retain as proposed
24.	Standards	MUZ-ST2.2 – Setbacks	Support	KiwiRail strongly supports a 5m setback for buildings and structures on sites that adjoin the rail corridor.	Retain as proposed
25.		MUZ-ST10 – Visibility at Railway Crossings	Support	KiwiRail supports the requirement to comply with TR-R2 – Access, and TR-APP5 which specifies no-obstruction zones within proximity to level crossings to maintain sightlines.	Retain as proposed
26.		MUZ-ST11 – Access	Support	KiwiRail supports the requirement to comply with TR-R2 – Access, and TR-ST1, particularly TR-ST1.2 which requires vehicle crossings to be setback 30m from level crossings, and TR-ST1.3 which requires existing vehicle crossings within 30m of a level crossing to maintain sightlines.	Retain as proposed
27.		MUZ-ST16 – Railway line Noise Insulation	Seek amendment	KiwiRail strongly supports the inclusion of a standard requiring noise insulation for noise sensitive activities within proximity to the rail corridor. KiwiRail encourages Territorial Authorities to manage noise sensitive activities within 100m of the rail corridor to ensure that neighbouring occupants have an acceptable level of	Amend as follows: MUZ-ST16.2 ~~Between 30 metres and 100 metres of the nearest edge of the railway track of the North Island Main Trunk Line~~ Any new building that contains

Feedback Number	Section of Plan	Specific Provision	Support/Oppose/ Seek Amendment	Reasons for Feedback	Relief Sought (as stated or similar to achieve the requested relief)
				amenity, and their health is unaffected by operational rail noise effects and to address reverse sensitivity effects. KiwiRail's approach is to allow for noise sensitive activities within the Rail Corridor Noise Control Overlay (100m of the rail corridor), provided there are adequate provisions requiring effective noise insulation. Whilst we seek a 5m building setback, this is for safety to allow occupants to maintain and access their buildings without accessing the rail corridor or getting too close to trains. While we don't oppose the use of physical setbacks as an option for mitigating noise effects, we recommend amendments for consistency with our model standards to allow for well mitigated development close to the corridor. KiwiRail also seeks amendment to the ventilation standard which has been tested through the appeal process in recent plan reviews.	a noise sensitive activity <u>within the Rail Corridor Noise Control Overlay</u> must be designed and constructed to achieve the following indoor design noise levels: MUZ-ST16.4 Where ventilating windows must be closed in order to meet the internal noise levels specified in MUZ-ST16.2, a mechanical ventilation system must be installed <u>that achieves the following requirements:</u> ~~The system must provide mechanical ventilation to satisfy Clause G4 of the New Zealand Building Code and shall not exceed more than 35 dB LAeq(30s) when measured at 1 metre from any grille or diffuser.~~ <u>a) Provides mechanical ventilation that can operate continuously to satisfy clause G4 of the New Zealand Building Code and that provides at least 1 air changes per hour, but no less than 7.5L/s per occupant;</u> <u>b) Provides cooling and heating that is controllable by the occupant and can maintain the inside temperature between 18°C and 25°C when assessed using a 2.5% design weather condition for the applicable location. An acceptable design weather set would include IRHACE Yearbook 2009 NIWA weather data; and</u> <u>c) A HVAC system installed in compliance with (a) and (b) above, must not generate more than 35 dB LAeq(30s) when measured 1 metre away from any grille or diffuser. The noise level must be measure after the system has cooled the rooms to the temperatures in (ii), or after a period of 30 minutes from the commencement of cooling (whichever is the lesser).</u> <u>Alternatively, in lieu of section a) above, a design verified by a suitably qualified and experienced HVAC expert stating the design proposed will provide ventilation and internal space temperature controls to meet or exceed the outcomes described in parts a).</u> <u>A commissioning report must be submitted to the Council prior to occupation of the building demonstrating compliance with all of the mechanical ventilation system performance requirements.</u>
28.		MUZ-ST17.1	Support	KiwiRail supports this standard which requires all allotments and new buildings to be connected to the Council's reticulated system. KiwiRail does not accept stormwater discharge from neighbouring properties which could undermine the safe and efficient operation of the rail corridor.	Retain as proposed

SUBMISSION ON PROPOSED PLAN CHANGE E – Town Centre (Manawatū District Council)

To: Manawatū District Council
Private Bag 10 001, Feilding 4743
135 Manchester Street, Feilding

Name of Submitter: Woolworths New Zealand Limited

Woolworths New Zealand Limited (**the Submitter**) provides this submission on 'Proposed Plan Change E: Town Centre' (**PC-E**) as part of the Manawatū District Plan review. PC-E proposes to replace the existing Town Centre Zone and Mixed-Use Zone provisions of the Manawatū District Plan in their entirety. PC-E also changes a number of definitions used by the District Plan to bring them into line with central government National Planning Standards (2019).

The Submitter currently owns and operates a Woolworths Supermarket on the site at 147 Kimbolton Road and owns another adjacent site at 12 Weld Street, Feilding. The sites are located within the Mixed Use Zone (**MUZ**) (formerly known as the Outer Business Zone).

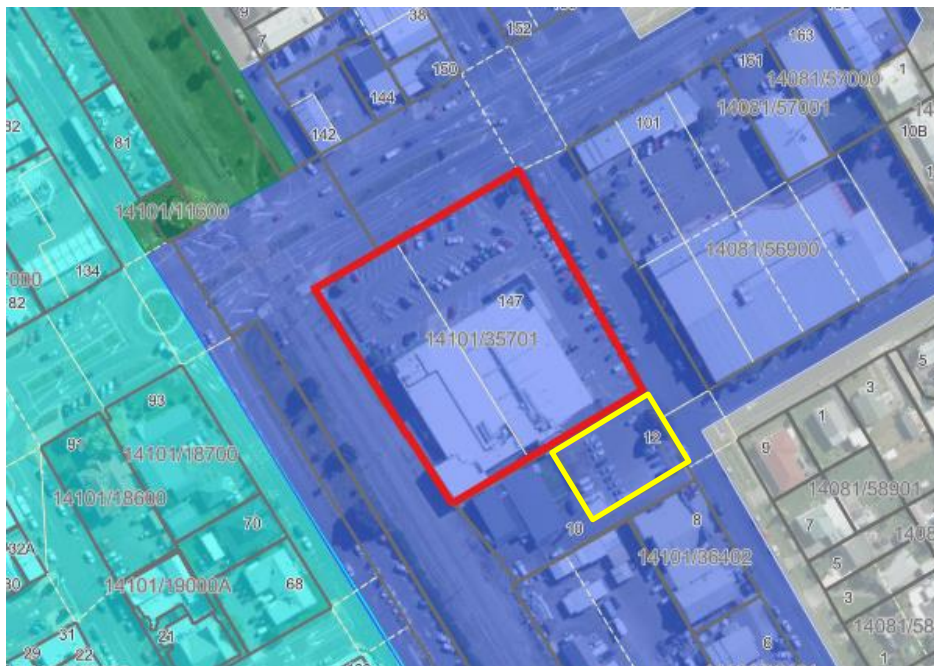


Figure 1: Woolworths Supermarket (outlined in red) and Woolworths owned land (outlined in yellow) at 147 Kimbolton Road and 12 Weld Street, Feilding.

The specific parts of the plan change that this submission relates to are the proposed definitions and the proposed MUZ provisions that either directly or indirectly have the potential to impact on the Submitter's interests and ability to continue to operate and maintain its supermarket within the Manawātū District.

In summary, the following key aspects are noted:

- The Submitter supports the proposed reclassification of supermarkets as a **permitted activity**, subject to compliance with relevant development standards. This is a positive shift from the previous framework, where supermarkets were discretionary activities, and aligns with the functional role that supermarkets play in mixed-use environments and their benefits for the community. Permitting supermarkets provides greater certainty for future investment and will support a range of operational improvements, including small-scale alterations, additions, refurbishments, or potential redevelopment of the existing supermarket.
- The Submitter supports the increase in the permitted building height from 9m to 12m within the MUZ. This enables greater flexibility for potential future expansion or modifications to the Woolworths supermarket and to other buildings within the MUZ.
- The Submitter supports the increased focus on managing the effects of noise sensitive activities (e.g. residential, educational, and community facilities) within the MUZ, particularly as these are now permitted activities. The Submitter strongly supports the principle that any reverse sensitivity effects should be addressed through the design of noise sensitive activities themselves by requiring appropriate acoustic insulation and mechanical ventilation to ensure they do not constrain the reasonable operation of lawfully established commercial activities, including supermarkets.
- The Submitter supports the proposed provisions that manage noise sensitive activities within proximity to the rail corridor. These provisions are appropriate and provide a useful mechanism for reducing the risk of reverse sensitivity complaints. Given supermarkets are not included in the definition for noise sensitive activities, this ensures that supermarkets are not unnecessarily restricted in relation to rail noise, and that new residential or other noise sensitive activities are located and designed appropriately to manage those effects.

The specific amendments, additions or retentions to the proposed plan change sought by the Submitter are listed in **Appendix 1** to this submission. The Submitter also seeks any consequential amendments to the provisions that may be required to give effect to the relief sought.

Overall, the Submitter supports the direction of the proposed changes to the MUZ and associated provisions in PC-E. The proposed provisions provide greater certainty, flexibility, and operational efficiency for supermarkets, while appropriately managing reverse sensitivity effects which may arise from noise sensitive activities being established within the zone.

The Submitter could not gain an advantage in trade competition through this submission and the submission does not raise matters that relate to trade competition or the effects of trade competition.

The Submitter wishes to be heard in support of this submission. If other parties make a similar submission, the Submitter would consider presenting a joint case with them at any hearing.



Philip Brown
Campbell Brown Planning Limited
For and on behalf of Woolworths New Zealand Limited

18 July 2025

Address for service of submitter:

C/- Campbell Brown Planning Limited
PO Box 147001
Ponsonby
AUCKLAND 1144

Attention: Philip Brown

Telephone: [REDACTED]

Mobile: [REDACTED]

Email: philip@campbellbrown.co.nz

Appendix A

Reference	Proposed provision	Submitter position	Reason for submission	Relief sought
MUZ-P7.1	Have acoustic insulation and ventilation appropriate to avoid or mitigate the effects of noise from activities in adjoining buildings or other activities within the same building.	Support	The Submitter supports this policy as it recognises the importance of effectively managing potential reverse sensitivity effects associated with residential activities within the Mixed Use Zone. With residential activities now classified as permitted activities (whereas they were previously discretionary) it is essential that the responsibility for providing adequate acoustic insulation rests with residential developments (the receiver). This is a reasonable and necessary measure to ensure that noise generated by the operation of a supermarket can continue without constraint.	Retain as drafted.
MUZ-P7.2	Manage any potential reverse sensitivity effects of residential activities in the Mixed Use Zone by requiring appropriate privacy, daylight, and acoustic mitigation.	Support	As above.	Retain as drafted.
MUZ-R2.1	Commercial Services, Entertainment Facilities, Retail Activities, Large Format Retail Activities, Supermarkets, Funeral Parlours and Ancillary Activities Activity Status: Permitted	Support	The Submitter supports the shift to a more permissive planning framework that now enables supermarkets as permitted activities, subject to compliance with relevant standards. This change will assist the Submitter in continuing the ongoing operation and necessary maintenance of the Woolworths supermarket and enable the supermarket to continue to serve the community efficiently without undue regulatory constraints.	Retain as drafted.
MUZ-MD31 MUZ-MD36	(MUZ-MD31) Adequacy of residential unit, unit within a multi-unit residential development and visitor accommodation noise insulation, ventilation and solid waste management storage. (MUZ-MD36) Building location and adequacy of noise insulation to achieve internal noise levels. (residential activities) (MUZ-MD50) Building location and adequacy of noise insulation to achieve internal noise levels. (community facilities, tourist facilities and education facilities)	Support	As above, the Submitter supports this matter of discretion as it recognises the importance of effectively managing potential reverse sensitivity effects associated with residential activities within the Mixed Use Zone. This is a reasonable and necessary measure to ensure that typical noise levels generated by the operation of a supermarket can continue without constraint.	Retain as drafted.
MUZ-ST1.1	The maximum permitted height for any building in the Mixed Use Zone is 12m.	Support	The Submitter supports the proposed increase in the maximum permitted height from 9m to 12m, as this would enable greater flexibility for potential future expansion or modifications to the Woolworths supermarket.	Retain as drafted.
MUZ-ST15.1 MUZ-ST16.1 and MUZ-ST16.2	(15.1) Any habitable room in a building used by a noise sensitive activity, or accommodation unit or room intended for sleeping as part of visitor accommodation, within the Mixed Use Zone shall be protected from noise arising from outside the building by ensuring the	Support	The Submitter supports these standards which require noise-sensitive activities (assisted living accommodation, community facilities, residential activities, education facilities, visitor accommodation, and hospitals) to be located an appropriate distance from the rail corridor.	Retain as drafted.

	external sound insulation level achieves the following minimum performance standards. (16.1) No new noise sensitive activity can locate within 30 metres of the nearest edge of the railway track. (16.2) Between 30 metres and 100 metres of the nearest edge of the railway track of the North Island Main Trunk Line any new building that contains a noise sensitive activity must be designed and constructed to achieve the following indoor design noise levels: - Bedrooms: 35dB (LAeq(1h) - Habitable Rooms: 40dB (LAeq(1h) - Hospitals: 40dB (LAeq(1h) - Community facilities (excluding recreational and sports facilities): 35dB (LAeq(1h) - Education Facilities: 35dB (LAeq(1h)		The Submitter considers these provisions to be an effective means of managing reverse sensitivity effects. Given supermarkets are not included in the definition for noise sensitive activities, this ensures that supermarkets are not unnecessarily restricted in relation to rail noise, and that new residential or other noise sensitive activities are located and designed appropriately to manage those effects.	
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From: [Make your mark Manawatū](#)
To: [MDC Submissions](#)
Subject: Proposed Plan Change E Submission Form
Date: Wednesday, 23 July 2025 6:19:27 am

008

Proposed Plan Change Submission Form Form Submission

There has been a submission of the form Proposed Plan Change Submission Form through your Make your mark Manawatū website.

Proposed Plan Change:

Proposed Plan Change E: Town Centre

First Name

Russell

Last Name

Prior

Physical Address

[REDACTED]
[REDACTED]
[REDACTED]

Postcode

[REDACTED]

Address for service

[REDACTED]

Postcode

[REDACTED]

Phone (day)

[REDACTED]

Mobile

[REDACTED]

Email

isla.park@outlook.com

I ____ gain an advantage in trade competition through this submission.
could not

This submission specifically relates to:

Rezoning of the town centre specifically 123 Manchester Street

My submission is:

We wish 123 Manchester St be included in the Mixed Use zone. It already has 1 apartment.
The building is presently vacant. It is very hard to find a commercial tenant... and could
possibly be divided into 2 further apartments.
The building next door is included in mixed use.

I seek the following decision from the Manawatū District Council.

The mixed use zone include 123 Manchester Street.

I ____ to be heard in support of this submission.

I wish to be heard.

**If others make a similar submission I ____ consider presenting a joint case with them
at a hearing.**

I will not

To view all of this form's submissions, visit

https://makeyourmark.manawatudc.govt.nz/index.php/dashboard/reports/forms_new/data/45

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your mark Manawatū.

25 July 2025

RAI 04 03
2025
AW:LMS

District Plan Team,
Manawātū District Council,
135 Manchester Street,
Feilding 4702.

submissions@mdc.govt.nz

Dear Madam/Sir,

SUBMISSION: PROPOSED PLAN CHANGE E -TOWN CENTRE

Thank you for the opportunity to make a submission on Proposed Plan Change E: Town Centre.

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. The submission reviews the proposed district plan change in regards to its alignment with the Regional Policy Statement component of the One Plan and seeking to ensure that the proposed change is consistent with the One Plan provisions.

General Comment

Proposed Plan Change E (PC E) generally aligns with Horizons' One Plan, the Regional Land Transport Plan (RLTP), the Regional Public Transport Plan (RPTP) and National Policy Statement on Urban Development (NPS-UD). It enables housing intensification within the Feilding urban environment while taking identified constraints into account.

Horizons also acknowledges that Manawātū District Council (MDC) intends to review its approach to natural hazard management through a future plan change (Section 32 Report, page 22). Horizons expects this review will include provisions to address risks not covered in PC E, such as stormwater flooding, seismic activity and liquefaction.

Additionally, Section 32 Report (page 22) states, in relation to *stormwater and flooding hazards*:

"A rule requiring resource consent for building on [identified] land subject to inundation has been inserted. The associated policy states that building on such land should be avoided unless floor level can be built up."

However, these provisions, which Horizons considers necessary to give effect to One Plan's RPS-HAZ-NH-P9 and RPS-HAZ-NH-P10, do not appear to be included in PC E.

In this context, Horizons partly supports PC E and makes the following submission points.

Submission Points

1. Horizons **party opposes** MUZ-ST1.1 and TCZ-ST1.1 as they do not align with NPS-UD Policy 5 and One Plan RPS-UFD-P4 (3).

NPS-UD Policy 5 says:

"Regional policy statements and district plans applying to tier 2 and 3 urban environments enable heights and density of urban form commensurate with the greater of:

- a) the level of accessibility by existing or planned active or public transport to a range of commercial activities and community services; or*
- b) relative demand for housing and business use in that location."*

RPS-UFD-P4(3) says:

"District plans applying to urban environments must enable heights and density of urban form which are commensurate with the greater of:

- a) relative demand for housing and/or business use in that location, or*
- b) the level of accessibility provided by existing or planned active transport or public transport to areas with community services and employment opportunities."*

The Section 32 Report of PC E (page 11) says:

"The Manawatū District is a tier 3 local authority area, and therefore Policy 5 does not directly apply. That said, NPS-UD Clause 1.5 strongly encourage tier 3 local authorities to implement these obligations.

PC-E permits higher density apartment-style living within the Town Centre Zone and Mixed Use Zone and increases the maximum height for buildings to enable more residential and business opportunities within the Feilding Town Centre. The area covered by both zones already accommodates public and active transport options.

Height limits in the Town Centre Zone and Mixed Use Zone are proposed to be increased from 9m to 12m to provide more flexibility for businesses and to facilitate further apartments. This provides the opportunity for multi-storey apartments should demand for this development type exist in the future."

Horizons does not agree with the Section 32 interpretation on the applicability of NPS-UD Policy 5 on tier 3 local authority areas. Since NPS-UD Policy 5 explicitly applied to both tier 2 and 3 urban environments, tier 3 councils, including Manawatū District Council, are obliged to give effect to Policy 5, not merely encouraged to. Clause 1.5 of NPS-UD applies only to provisions that are exclusive to tier 1 and 2 local authorities.

Furthermore, *Appendix 1: Regional Direction Assessment* of Section 32 Report (Pages 56-60) does not clearly demonstrate how the plan change gives effect to RPS-UFD-P4 (3).

Relief Sought:

Horizons requests that the Council:

- 1) Include an assessment demonstrating how PC E gives effect to NPS-UD Policy 5 and RPS-UFD-P4(3).
 - 2) Where that assessment identifies the need for increased building height, amend the MUZ-ST1.1 and TCZ-ST1.1 accordingly.
2. Makino Stream intersects the Town Centre Zone (TCZ) at Manchester Street. This area is identified as "Land Subject to Inundation" in GRZ-APP1 of PC B. PC B includes provisions under GRZ-R6 to manage flood risk on land subject to inundation along the Makino Stream. Horizons has requested to amend GRZ-R6 and GRZ-APP1.

Horizons recommends that the amended provisions in GRZ-R6 of PC B be applied to the part of the Town Centre Zone intersected by the Makino Stream.

Relief Sought:

Horizons requests PC E be amended to incorporate the amended provisions of GRZ-R6 proposed in PC B, to ensure consistency in the management of flood hazards across the District Plan.

3. Horizons **partly opposes** TCZ-ST2 as it does not align with the One Plan RPS-EIT-P2. The proposed Town Centre Zone (TCZ) intersects with the Makino Stream, and appropriate provisions are required to protect the bank of the stream from effects associated with urban development. Horizons recommends adopting a similar approach to that taken in *General Residential Zone (GRZ-ST4.4)* to address this matter.

Relief Sought:

Horizons requests TCZ-ST2 be amended to include provisions that protect the bank of Makino Stream, ideally reflecting the approach taken in GRZ-ST4.4 in PC B.

4. Horizons **supports** MUZ-P2 and TCZ-P2 as they align with the One Plan provisions; RPS-UFD-O3 and RPS-UFD-P4 (1) (a)-(g)

Relief Sought:

Horizons requests MUZ-P2 and TCZ-P2 be retained as notified.

5. Horizons **supports** MUZ-O5, MUZ-P10, MUZ-ST17, TCZ-O4, TCZ-P9, and TCZ-ST15 as they align with the One Plan provisions; RPS-UFD-P8(1)(a) RPS-LF-FW-O4(1), and NPS-FM policy 3 and clause 3.5(4). Additionally, it is noted that TCZ-ST15 is incorrectly referred to as TCZ-ST16 in TCZ-R3.1, which may require correction.

Relief Sought:

Horizons requests that the Council:

- i. retain MUZ-O5, MUZ-P10, MUZ-ST17, TCZ-O4, TCZ-P9, and TCZ-ST15 as notified.
- ii. correct the reference to TCZ-ST15 in TCZ-R3.1

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

Yours sincerely,



Aruna Wickramasinghe
SENIOR POLICY PLANNER

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Aruna Wickramasinghe
Policy and Strategy Team



Email: Aruna.Wickramasinghe@horizons.govt.nz

010



25 July 2025

Manawatū District Council
Private Bag 10001
Feilding 4734

Emailed to: submissions@mdc.govt.nz

Submission on Proposed Plan Change E: Town Centre Zone and Mixed Use Zone

Please find attached a submission which the Manawatū District Council wishes to make on Proposed Plan Change E to the Manawatū District Plan.

The Manawatū District Council does not want to be heard in support of the submission.

Yours sincerely

A handwritten signature in black ink, appearing to read "Shayne Harris".

Shayne Harris
Chief Executive

Manawatū District Council Plan District Plan Review

Proposed Plan Change Submission Form

Manawatū District Plan

This is a submission on the following proposed plan change proposed to the Manawatū District Plan.

Proposed Plan Change: **E – Town Centre Zone and Mixed Use Zone**

Submitter Details

*Full name: Manawatū District Council

Physical address: 135 Manchester Street
Feilding 4702

Phone (day) 063230000

Email: shayne.harris@mdc.govt.nz

Fields marked with a '' are mandatory*

Declarations

1. **I could not** gain an advantage in trade competition through this submission.
2. **I am** directly affected by an effect of the subject matter of the submission that—
 - a. adversely affects the environment; and
 - b. does not relate to trade competition or the effects of trade competition.

Submission Details

Management of Feilding Inundation Area Overlay

Submission

Properties adjoining the Makino Stream in the Mixed Use Zone near the bridge on Manchester Street are potentially subject to inundation from the stream as identified in the existing District Plan. However, district plan Mixed-Use Zone provisions relating to inundation are absent.



Policy direction and rules need to be restored to the District Plan in order to guide decisions on future developments and resource consents for activities which may wish to be located within the area which is shown on maps to be subject to inundation.

In the first instance, new building or extensions to buildings should avoid being located in areas known to be subject to inundation. Where this is impractical, then the floor level of the building should be above the inundation water levels from a 1-in-100 flood (1% Annual Exceedance Probability) event. The 1-in-100 year (plus adjustment for climate change) flood event standard is consistent with that used in other parts of the District Plan (the General Residential Zone and Subdivision Chapters for example).

The standard should incorporate the 1% AEP floor level requirements proposed in MUZ-P11 along with freeboard of 500mm. A 500mm freeboard requirement would be consistent with that used in the Subdivision Chapter of the District Plan and would allow for both an additional margin of safety (e.g. if water levels are higher than those modelled) and additional protection against the effects of wash from vehicles driving through flood waters.

To have practical effect, the proposed standard will need to be referenced in the list of standards which new buildings and alterations to buildings in the Mixed Use Zone must comply with to be a permitted activity (Rule MUZ-R1). Consistent with the approach taken for the General Residential Zone and Subdivision Chapters, failure to comply with the standard should require a resource consent (as a restricted discretionary activity) so that alternative inundation risk mitigation measures or approaches can be considered and, if not acceptable, the consent declined.

Relief / decision sought

To give effect to the submission the following amendments are recommended:

1. MUZ-O5 should be amended as follows (additional text underlined):

Stormwater runoff and inundation is managed in an integrated manner which avoids or minimises adverse effects on surrounding land, the Makino Stream and Oroua River.

2. Add a new policy MUZ-P11 to the effect of:

MUZ-P11: Construction of new buildings, or extensions to buildings, on land within the Inundation Areas shown on planning maps must be avoided if those

buildings cannot be designed and built with platforms or floor levels which avoid entry by water in a 1% AEP (1-in-100 year) flood event.

3. Amend rules as follows:

(a) Add a new standard to the following effect:

MUZ-ST17: Buildings in the Inundation Area: New buildings, or extensions to buildings:

MUZ-ST17.1: Any building located in the identified inundation area must have building platform(s) or floor level that can achieve a minimum free-board level 500 mm above the 1% AEP (100-year flood level).

(b) Add a cross reference proposed MUZ-ST17 (above) into the following provision:

- **MUZ-R1.1** - [Permitted activities] New buildings, including accessory buildings, and internal and external additions or alterations to an existing building.

(c) Add an additional matter of discretion (MUZ-MD15) as follows:

MUZ-MD15: Avoidance or mitigation of flood hazard and stormwater inundation.

Stormwater Management Policy Direction

Submission

Both the Mixed Use Zone and Town Centre Zone introduce policy and provisions relating to stormwater management:

- Mixed Use Zone:
 - Policy MUZ-P10.2a and MUZ-P.10.2c
- Town Centre Zone:
 - Policy TCZ-P9

The policy direction could be interpreted to imply that stormwater treatment is expected on-site.

The management of stormwater in Feilding is an important planning & infrastructure consideration. Council has an existing public stormwater system in place and funding is in place for committed upgrades to this. Any decisions around stormwater management need to consider the wider catchment & infrastructure available, as well as what is appropriate on a site-by-site basis.

Council considers the wording of MUZ-P10 & TCZ-P9 need review. On-site stormwater management in the Town Centre and Mixed Use Zones will be

challenging given site sizes & existing building development. Furthermore, information suggests every site in the areas has good access to the public stormwater system. Attenuation measures (such as living roofs, rain gardens and tanks and permeable surfaces) may be more realistic, but not necessarily required.

Manawatū District does not consider disposal of stormwater through soak pits to be an appropriate means within the Town Centre and Mixed Use Zones. This is because:

- the water table under Feilding is high, which can make soak pits ineffective.
- the proportion of impermeable surfaces are high in both the Town Centre and Mixed Use Zone (and so may generate a volume of runoff which may quickly overwhelm the capacity of the soak pit and see stormwater flow into other properties),
- soak pits are prone to rapid failure and clogging (particularly if not maintained)
- there is usually sufficient drainage nearby (via the council network)

Relief / decision sought

To give effect to the submission the following amendments are recommended:

- (a) Amend policy MUZ-P10 by adding a new clause between existing subclauses MUZ-P10.1 and MUZ-P10.2 to read:

MUZ-10.X Avoiding disposal of stormwater by means of soak pits.

- (b) Replace the word “treatment” with “attenuation” in Policy MUZ-R10.2a and 10.2c.

- (c) Amend policy TCZ-P9 by adding a new clause between existing subclauses TCZ-P9.1 and TCZ-P9.2 to read:

TCZ-9.X Avoiding disposal of stormwater by means of soak pits.

- (d) Replace the word “treatment” with “attenuation” in Policy TCZ-P9.2a and 9.2c.

Stormwater Management Standards

Submission

Standards MUZ-ST17.1 and TCZ-ST15 requires all allotments and new buildings to be connected to the Council’s reticulated stormwater system. The reference to new buildings does not distinguish between building size and so would trigger requirements for small ancillary buildings (such as garden sheds) and some other structures to be connected to the stormwater system. This appears unnecessary and costly when structures are small and unlikely to add significantly to stormwater runoff (particularly when many sites already have close to 100% coverage by impermeable surfaces).

Manawātū District Council instead suggests that the standard only apply to buildings the size of a large garage or above (e.g. with a floor area of 30 square metres).

Relief / decision sought

To give effect to the submission the following amendments are recommended:

Amend Standard MUZ-ST17.1 as follows:

All allotments, and new buildings with a floor area greater than 30m², must be connected to the Council's reticulated stormwater system.

Amend Standard TCZ-ST15.1 as follows:

All allotments, and new buildings with a floor area greater than 30m², must be connected to the Council's reticulated stormwater system.

Rule MUZ-R3

Submission

Rule MUZ-R3 is **supported in part**.

The section 32 report contains expert noise opinion from SLR Consulting that activities in the Mixed Use Zone which are within 30 metres of the railway track should obtain a resource consent. SLR recommended that the matters to which the Manawātū District Council should restrict its discretion should include:

- Whether the development can be located outside the buffer area, and
- The extent to which the relevant standards can be achieved, and
- Whether the design of the noise sensitive building achieves an inside vibration level of Class C in NZ 8176: 2017.

These matters of discretion do not appear within Rule MUZ-R3, as it was intended that activities within the 30m of the railway track would take on full discretionary activity status. However, rule MUZ-R3 is missing a reference to full discretionary activities entirely.

Relief / decision sought

To give effect to the submission the following amendments are recommended:

(a) Amend Rule MUZ-R3.2 as follows:

MUZ-R3.2: Activity Status: Restricted Discretionary

Where compliance is not achieved with ~~any of the standards in MUZ-R3.1~~ standards MUZ-ST8 to MUZ-ST15, MUZ-ST16.2 to MUZ-ST16.4 and MUZ-ST17.

(b) Add a new Rule MUZ-R3.3 as follows:

MUZ-R3.2: Activity Status: Discretionary

Where compliance is not achieved with not achieved with standard MUZ 16.1

Presenting at hearings

The Manawatū District Council **does not wish to be heard** in support of this submission.

If others make a similar submission the Manawatū District Council **would not** consider presenting a joint case with them at a hearing.

Signature



Signed

Date 25/07/2025.....

Important information

Send or deliver your feedback to:

District Plan Submissions
Manawatū District Council
Private Bag 10 001, Feilding 4743
135 Manchester Street, Feilding

submissions@mdc.govt.nz

Hand deliver to:

Customer Service Centre
Manawatū District Council
135 Manchester Street
Feilding 4702

Note: If this is closed please visit the Makino Aquatic Centre

For enquiries:

phone: 06 323 0000

email: districtplanreview@mdc.govt.nz

The content of this submission will be public. In order to satisfy requirements of clause 8A of Schedule 1 to the Resource Management Act 1991, the names of submitters and their address for service (email or postal address) will be made available to those wishing to make a further submission in support or opposition. Other personal information will be withheld.

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