

Written comments on a project under the Fast Track Approvals Act 2024

Project name	Bunnythorpe Business Park (FTAA-2608-1274)
---------------------	--

Before the due date, for assistance on how to respond or about this template or with using the portal, please email contact@fasttrack.govt.nz or phone 0800 FASTRK (0800 327 875).

All sections of this form with an asterisk (*) must be completed.

1. Contact Details

Please ensure that you have authority to comment on the application on behalf of those named on this form.

Organisation name (if relevant)	Manawatū District Council		
*First name	Shayne		
*Last name	Harris		
Postal address	Private Bag 10001 Feilding 4743 New Zealand		
*Contact phone number	027 443 8455	Alternative	06 323 0000
*Email	Shayne.harris@mdc.govt.nz		

2. Please provide your comments on this application

Thank you for the opportunity to provide comments on the Bunnythorpe Business Park referral application under the Fast Track Approvals Act 2024. These comments are provided on behalf of the Manawatū District Council.

Location relative to the Manawatū District

The Proposed Bunnythorpe Business Park (BBP) is on rural land on the southern side of the Kairanga-Bunnythorpe Road, with the Manawatū District Council Boundary directly adjacent (at the intersection of Kairanga-Bunnythorpe Road and Roberts Line).

Kairanga-Bunnythorpe Road and Campbell Road are both used by traffic travelling between Feilding and Palmerston North, with the latter carrying a considerable amount of freight through to Feilding and beyond (frequently being used by some trucking firms an alternative northern route to State Highway 3 / Rangitikei Line).

Feilding and Palmerston North are also connected by the North Island Main Trunk Railway.

However, it is unknown if the BBP proposal envisages direct access to the railway.

The Mangaone Stream, and Derby Creek which pass through the BBP site also pass through the Manawatū District upstream of the BBP site. These waterways are part of a wider stream network in the Taonui Basin. Part of the Taonui Basin Spillway (also known as the Roberts Line Spillway) extends into the Manawatū District.

Strategic land supply context

The BBP proposal includes 72 small-medium lot industrial park to the immediate west of Bunnythorpe township, adjoining land designated for a large KiwiRail rail freight hub. The land concerned is currently rural and is part of the broader highly productive land resource (being LUC classes 2 and 3) found across this area of the Manawatū.

The BBP also needs to be seen within the strategic sub-regional land supply context as the Feilding and Palmerston North industrial land markets are proximate. The Manawatū District's largest area of industrial land (the Kawakawa Industrial Precinct) is five kilometres to the north of the proposed BBP site. The Kawakawa Industrial Precinct forms part of the broader Manawatū Te Utanganui Distribution Hub (alongside the industrial land areas in Palmerston North).

A 2026 analysis undertaken for the Manawatū District Council by BERL has identified a need for at least 47 hectares of additional industrial land in the Manawatū District by 2055 to meet NPS-UD targets (including the competitiveness margin). At 81 hectares, the Bunnythorpe Business Park site is almost twice the size of the additional industrial land required for the Manawatū District.

Matters of specific interest to the Manawatū District Council and its community

The Manawatū District Council seeks the following matters being given greater attention in the substantive application if the BBP proposal is referred to the Fast Track Panel.

Roading network impacts

- The Transport Technical Assessment Summary suggests the BBP development will create an additional 4,770 vehicle trips per day. It is noted that the Traffic Technical Assessment excludes consideration of traffic impacts within Bunnythorpe or broader network connections along Campbell Road and Railway Road which carry a lot of traffic between Feilding and Palmerston North.
- The Master Plan shows several vehicle access points along Kairanga-Bunnythorpe Road (including the access via Te Ngaio Road). Kairanga-Bunnythorpe Road is currently narrow with equally narrow bridges and culvert crossings along its length. Other than the upgrades to the intersection at Roberts line, Manawatū District Council has seen no indication of road improvement works to address the impacts of additional traffic (potentially including more or heavier trucks) using Kairanga-Bunnythorpe Road and it appears the applicant is holding out for improvements by the PNCC or the proposed Manawatu Regional Freight Ring Road – the exact timing of which is still to be settled.

- The effects of additional traffic on intersections in Bunnythorpe (at Railway Road and Campbell Road) would also benefit from further analysis. At peak times there is considerable traffic travelling between Feilding and Palmerston North along the dogleg from Campbells Road (north) to Railway Road (south). This traffic also must navigate a railway crossing which has minimum space for traffic queuing. Additional traffic on Kairanga-Bunnythorpe Road has the potential to exacerbate congestion in this area at peak times.
- The Kairanga-Bunnythorpe Road is proposed to be part of the Manawatū Regional Freight Ring-Road in the future (which is of strategic importance to the Manawatū District and has been endorsed as a priority by the Infrastructure Commission's Infrastructure Priorities Programme). The three proposed entry and exit points proposed for the BBP (if Te Ngaio Road is included) may be onto one of several ring road alignment options which are under consideration for the freight ring road. Manawatū District Council is interested in ensuring the BBP development does not compromise the safe and efficient operation of the freight ring road.
- The BBP proposal also has the potential to direct more traffic along Campbell Road. Truck traffic along Campbell Road is a known concern to Ngāti Kauwhata as Aorangi marae is located on the route between Bunnythorpe and Feilding. It is noted that wider network effects on roads such as Campbells Road were not included in the traffic assessment.

Stormwater and flooding impacts

- Manawatū District Council understands the BBP site to be located in the path of the Mangaone and Derby Creek streams and the Taonui Spillway. It is in an area where flooding has been observed previously – particularly in 2004. The applicant is proposing to establish building platforms to avoid buildings being flooded in a 0.5% AEP flood event (and cut within the existing flood prone area to maintain temporary storage).
- We are unaware of any explicit modelling by the applicant of the upstream effects of building up sites in the BBP. Modelling flooding impacts further upstream should also be undertaken to test whether built-up BBP building platforms exacerbate the flooding risk on land upstream of Cooksley Road in a heavily rainfall event. In 2004 the area around the Mangaone Stream to the North of Bunnythorpe (including road and rail links) was significantly affected by flooding and erosion.

Water and wastewater services

- The proposed BBP site is located adjacent to Palmerston North's North-East Industrial area. We understand this area already has limited PNCC water and wastewater network capacity.
- The applicant has mentioned two bores as the primary water supply to accommodate a total projected groundwater abstraction demand of 1,133,900 litres of water per day. Manawatū District Council understands that further testing is required to confirm

consultant assumptions that this can be met from the existing deep aquifer. If the aquifer was shown not to be capable of meeting demands, Manawatū District Council would expect to be consulted on any alternative solutions which could impact on bores in the Manawatū District or which would seek access to the Manawatū District Council's reticulated network (which currently extends to the northern edge of Bunnythorpe).

- In respect to wastewater, it is understood servicing is to be via the Palmerston North City Council reticulated network and that upgrades will be confirmed during the detailed design stage.

Tangata whenua interests

- It is noted that a Cultural Impact Assessment has been completed with Rangitāne O Manawatu assistance. Manawatū District Council notes that they are not the only tangata whenua grouping with interests in land in and around the BBP site.
- In respect of complying with Fast-Track Section 18 (Report on Treaty settlements and other obligations), it is noted that the site location is within the identified rohe of Ngāti Kauwhata and Ngāti Raukawa and their views should be sought as they have Treaty Settlement claims in process.

Note: All comments will be made available to the public and the applicant when the Ministry for the Environment proactively releases advice provided to the Minister for the Environment.

Managers signoff



Shayne Harris
Chief Executive
Manawatū District Council

Date: 23 September 2026