



Shaping Whanganui

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Whanganui District Council District Plan Review Phase Eight

Section 32 Report –

Proposed Plan Change 52 (Appendix I – NZS4404:2010 Update)

Dated:

June 2016

CONTENTS

Content	2
Introduction.....	3
1. Plan Review Process	
2. Statutory and Legislative Framework for the Review	
Part 1 – Proposed Plan Change	5
1. Background Research	
2. Consultation and Outcomes	
3. Description of the Proposed Plan Change	
Part 2 – Section 32 Evaluation	18
1. Requirement to make an Evaluation	
2. Consideration of Methods	
3. Proposed Issues	
4. Proposed Objectives	
5. Proposed Policies	
6. Proposed Rules	
7. Proposed Definitions/Assessment Criteria	
Appendix 1 – Marked up text	
Appendix 2 – Proposed amendments to Appendix I of the District Plan	

1. INTRODUCTION

1.1 PLAN REVIEW PROCESS

Section 79 of the Resource Management Act 1991 (the Act) requires Council to commence a review of its plans at least every 10 years. Recent amendments to the Act clarify that whole plans need not be reviewed. A Council may choose to review plans in part.

The existing provisions have been developed at different times and under different scenarios. There are some provisions that have been in the Plan since it was first developed but others have been operative for a shorter period of time. Others have been included in recent Plan changes. The intention of the review is not to meet a specific deadline under section 79 but to ensure the provisions in the plan are efficient and effective in managing the resources in the district and ensuring that Council's obligations under the Act are met.

The Act does not detail how a Council must review its plans. However consideration of the efficiency and effectiveness of existing provisions is considered the first step. Section 32 of the Act requires Council to carry out an evaluation of options before notifying a proposed Plan change. These matters are discussed throughout this report. The efficiency and effectiveness of the provisions in achieving the stated objectives is analysed in this report, as are the various options that were considered.

1.2 STATUTORY AND LEGISLATIVE FRAMEWORK FOR THE REVIEW

1.2.1 Resource Management Act 1991

Section 74 of the Act requires the Council to change the District Plan in accordance with its functions under Section 31, the purpose of the Act in section 5 and the other matters under sections 6, 7 and 8.

Territorial authorities have the following functions under the Act:

31 Functions of territorial authorities under this Act

1. *Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:*
 - a. *The establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the effects of the use, development or protection of land and associated natural and physical resources.*
 - ...
 - f. *any other functions specified in this Act.*
 - ...

The Council is given these functions for the purpose of promoting the sustainable management of natural and physical resources, which is defined:

5(2) In this Act, “sustainable management” means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:

- a. Sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and*
- b. Safeguarding the life-supporting capacity of air, water, soil and ecosystems; and*
- c. Avoiding, remedying, or mitigating any adverse effects of activities on the environment.*

Further guidance and direction on the way in which resources are to be managed is provided in sections 6, 7 and 8 of the Act.

1.2.2 National Policy Statements & Coast Policy Statement

The Act requires that District Plans give effect to any relevant National Policy Statements (NPS). A NPS is a document prepared under the Act to help councils decide how national issues should be balanced with local costs. There are no national policy statements relevant to this plan change.

1.2.3 Regional Policy Statement

In addition, the Act requires District Plan provisions give effect to the Regional Policy Statement (section 75(3)). The Regional Policy Statement (RPS) is the main vehicle for interpreting and applying the sustainable management requirements of the Act in a local context, and in this regard, guides the development of lower tier plans, including the District Plan.

The Manawatu-Wanganui Regional Council (Horizons) combined the Regional Policy Statement and six Regional Plans into one document called the One Plan. The One Plan became operative on 19 December 2014.

The One Plan is relevant to Plan Change 52 as it includes requirements relating to infrastructure as well as the requirement for the Council to be consistent with the document.

An assessment of how the provisions in Plan Change 52 compare with the objectives and policies of the One Plan are considered in Table 1 below.

One Plan – Infrastructure, Energy, Waste, Hazardous Substances and Contaminated Land		Proposed Plan Change 52
Objectives	Policy	Evaluation
Objective 3-1: <i>Infrastructure</i> ^ and other physical resources of regional or national importance	Policy 3-1: Benefits of infrastructure and other physical resources of regional or national importance	The proposed amendment of Appendix I, amendment of associated objectives, policies and performance standards, and the removal of assessment criteria will have no effect on the implementation of the One Plan. There are no identified effects for the Council to consider, as the regional council already covers them.

1.2.4 Other Plans & Strategies

Another matter to which Council must have particular regard is other management plans and strategies. Those which are relevant to Chapter 12, 13, 23 and Appendix I matters are discussed below. They have informed the preparation of this section 32 analysis.

Regional Pest Strategy

The Manawatu-Wanganui Regional Council has prepared the Regional Plant Pest Management Strategy 2015-2016. The Strategy outlines how each pest plant will be managed over a five year period. There are new provisions proposed in Appendix I which require identification of weeds, and site biosecurity including cleaning of machinery and ensuring material does not contain seeds and vegetation. These specific provisions are consistent with the aims of the Regional Pest Strategy.

Iwi Settlement Process

Schedule 11 of the Act requires Councils to consider any Treaty Settlements within their District. Relevant settlements include:

- Ngati Apa Claims Settlement Act 2010
- Whanganui River Deed of Settlement

The proposed amendments will not affect either of these Treaty Settlements.

The Tree Strategy 2016

A number of amendments to Appendix I include provisions taken from the recently operative Tree Strategy 2016. This will ensure consistency between the two documents.

2. PART 1 – PROPOSED PLAN CHANGE

2.1 BACKGROUND RESEARCH

Since the operative District Plan was drafted in the 1990s, there have been significant changes to NZS4404. Appendix I includes provisions over and above those contained in the standard. The appendix was last revised in 2012. This revision attempted to include many of the new approaches and specifications incorporated in the NZS4404:2010.

Council has recently revised and updated its Engineering Document 2012 to reference NZS4404:2010. This has enabled deletion of much of the Engineering Code 2012 where it was an exact duplicate of the NZS4404:2010.

The 2016 version of the Engineering Document deletes those duplications resulting from the inclusion of provisions contained in the 2012 Council Engineering Document into the NZS4404:2010. The changes are summarised as being:

1. Deletion of provisions that area contained or covered off in NZS4404:2010;
2. Re-ordering of sections to be consistent with the order in NZS4404:2010;
3. Removal of sections which were in NZS4404:2004 but are no longer in NZS4404:2010; and
4. New Whanganui specific requirements to update the engineering document to be applied in addition to NZS4404:2010.

As a result of the amendment of the Engineering Document, a number of provisions contained in Chapters 12, 13 and 23 need to be amended to be consistent with the changes.

Assessment criteria contained in Chapter 23 which relate to those matters contained in the NZS4404 and the Engineering Document have been deleted, and minor amendments proposed to objectives, policies and performance standards in Chapter 13. These changes are to ensure that the intent of the assessment criteria are still reflected through either NZS4404, the Engineering Document or provisions in Chapter 13.

2.2 CONSULTATION AND OUTCOMES

Consultation between the Whanganui District Council and members of the public has included the following actions:

Date	Location	Comments
15/04/2016	Shaping Whanganui – Phase 8 Council Website	Summary report of the proposed changes to the Engineering Code went online for comment.
18/04/2016	Email/Letter to stakeholders and owners	Letters sent to identified stakeholders who have an interest in the Engineering Document, such as builders and surveyors. Proposed changes to the Engineering Document were provided.

Feedback from the community via letters from stakeholders mentioned a range of issues which are addressed as part of this plan change.

Specifically, the issues raised are summarised as:

Part 1 – General Requirements and Procedures

- Support for deletion of the note that referred to recognised datums and new clause 1.8.2.5.2.

Part 2 – Earthworks and Geotechnical Requirements

- Section 2.5.1 – Plant Pest Management – typo in the heading. Supports the new paragraph as it is consistent with the objectives of the Regional Pest Strategy.
- Section 2.6.2 – As-built drawings for earthworks and drainage – notes that district wide aerial photography held by Horizons is being updated in the current year.
- Section 3.4.1.1 – Support as it is consistent with the objectives of the Regional Pest Strategy.

Part 5 – Wastewater

- Requested changes to ensure that the standards align with the wastewater standards set out in One Plan Rule 14-14 (new and upgraded discharged of domestic wastewater) and the Manual for Onsite Wastewater Systems Design and Management (Horizons Regional Council, 2010).

Part 6 – Water Supply

- Suggests inclusion of an advice note with regards to clause 6.6. It is likely that water takes for the 24 hours storage required will be within the permitted activity limits under One Plan Rules 16-1 and 16-2, but

an advice note is suggested to direct users to Horizons Regional Council for advice on water takes. Suggested wording is:

Note:

Rules 16-1 and 16-2 of Horizons One Plan set out the permitted activity limits and conditions that relate to the take and use of surface water and groundwater. If you have any questions regarding water takes please contact Horizons duty consents planner on Freephone 0508 800 800.

Part 7 – Landscape

- Support for new paragraph in section 7.2.4. Any environmental enhancement provided by planting is encouraged.
- Support for proposed paragraph in section 7.3.5 is supported. The need to consider alternative planting techniques to ensure the integrity of swales, given their importance to stormwater management is supported.

Appendix I – Technical Specifications

- Support for clause 1.5 requiring construction access be of a condition to ensure that no debris is deposited onto adjacent roads from the site during the construction period.
- Support for clause 1.7 requiring the developer to provide details of the management of fuel and the storage of hazardous substances. Any deliberate or accidental discharge of contaminants would require a Discharge Permit from Horizons, and depending on the nature of the discharge, may be subject to compliance action and remedial requirements.
- Support for the new paragraph in clause 2.6. The proposed requirements are considered to be consistent with Horizons requirements for small and large-scale land disturbance in One Plan Rules 13-1 and 13-2.

2.3 DESCRIPTION OF THE PROPOSED PLAN CHANGE

2.3.1 Proposed Plan change 52 (Appendix I – NZS4404:2010 Update) reviews the provisions of Appendix I, and related provisions contained in Chapters 12, 13 and 23.

Appendix I

Part 1: General Requirements and Procedures

- NZS4404:2010 now includes the majority of the definitions previously detailed in the 2012 document. Those now included have been deleted, leaving eight definitions in the 2016 document. No changes to these definitions are proposed.
- All abbreviations contained in the 2012 document are now included in NZS4404:2010, and therefore these have been deleted from the 2016 document.
- Discussion regarding related legislation has been deleted from the 2016 document as they are now contained in NZS4404:2010.
- A number of sections which were additional to the NZS4404:2004 standard, have now been included into NZS4404:2010, and have therefore been deleted.
- With regards to climate change, the new section has a new provision which references the now operative New Zealand Coastal Policy Statement 2010.
- A note which was previously included relating to recognised datums (Moturiki 00 + City Datum 100.06 so Moturiki level + City level – 100.06) has been deleted.
- Reference to the WDC Ten Year Plan and Annual Plan in the context of the Levels of Service section has been deleted.

Part 2 Land Stability, Foundations and Earthworks

- A number of provisions have been deleted due to their inclusion in NZS4404:2010. A number of sections which were in NZS4404:2004 and no longer in NZS4404:2010 have been removed.
- Section 2.5.1 is a new provision regarding plant pest management during construction/earthworks. This new provision is a result of recent concerns from Whanganui District Council in preventing the spread of pest plants.

Part 3: Roads

- Changes to documents used by Whanganui District Council has resulted in a number of updates to document references within Part 3: Roads.
- Reference to NZS4404:2010 has resulted in the re-numbering and re-ordering of a number of provisions in Part 3.
- Provisions that are now contained in NZS4404:2010, which were in the Engineering Appendix have been deleted.
- Provisions requiring Chapter 12 of the District Plan to be met appear in multiple locations within this part, and other parts of the Appendix. This is

a new general requirement throughout the document to ensure linkages back to the appropriate section of the District Plan.

- The following new sections are as a result of provisions which were included in NZS4404:2004 being removed from NZS4404:2010. Whanganui District Council wish to retain these provisions, so they have been added to this supplement document:
 - Section 3.3.7 Intersection and alignment design –minimum kerb radius, local road intersection and design of roundabouts.
 - Section 3.3.8 No exit roads – sump provision at the head of cul-de-sacs.
 - Section 3.3.11 – Footpaths, pedestrian access ways, cycle ways, berms – thickness of loam topsoil on berms and stormwater disposal and lighting to be provided.
 - Section 3.3.11.4 – Berms - rural areas provision of bicycles, pedestrians and motorised traffic, no less than 2m width between road side channel and road reserve boundary, and rural berms to be top soiled to same standard as urban unless already grassed undisturbed ground.
 - Section 3.3.12 Traffic signs, marking and road furniture – all road markings and traffic signs to comply with TNZ Manual.
 - Section 3.1.16 Private ways, private roads and other private accesses –, fencing requirements for rear/multi-unit or comprehensive developments. For individual lots, ensure it is possible to form an access to each lot and safely traversed. Commercial and industrial accessways.
 - Section 3.3.19.7.5 Sump location – design capacity of a single back entry sump with standard grating limited to about 28 l/s unless specific capacity known or derived. Double sumps to be used as a minimum at all low points.
 - Section 3.3.19.7.2 Sump design –side entry systems.
 - Section 3.4.5 Subgrade checking – subgrade to be inspected by designer to assess suitability of exposed subgrade, design to be modified where necessary and soft spots removed.
 - Section 3.4.17.2 Paths and accessways – concrete paths and accessways to be laid with construction joints at not more than 3m centres, crossfalls of 3% to be provided.
- Reference documents have been updated throughout Part 3: Roads.
- Section 3.3.14 Road lighting has a new clause (d), which requires poles to retain a stainless steel finish (not painted).
- Section 3.4.1.1 is new and relates to plant pest management during construction/earthworks. This new provision is a result of recent concerns from Whanganui District Council in preventing the spread of pest plants.
- Section 3.4.17.2 – there has been a change in crossfalls of 3-4% to 3%. Provision for 3-4% cross fall was provided for in NZS4404:2004, but this

has been removed from NZS4404:2010. Whanganui District Council wishes to retain this provision but amend it to 3%.

Part 4: Stormwater

- Reference to NZS4404:2010 has resulted in the re-numbering and re-ordering of a number of sections in Part 4.
- Provisions that are now contained in NZS4404:2010, which were in the Engineering Document 2012 (District Plan Appendix I) have been deleted.
- The previous provision relating to culverts in section 4.3.3.9 has been deleted. This is due to NZS4404:2010 sufficiently covering this aspect, along with the detail on the relevant drawings.
- Section 4.3.9.3 Minimum pipe sizes – this section provides updated minimum pipe sizes for single sump outlets and public mains.

Part 5: Wastewater

- Reference to NZS4404:2010 has resulted in the re-numbering and re-ordering of a number of sections in Part 5.
- Provisions that are now contained in NZS4404:2010, which were in the Engineering Document 2012 (District Plan Appendix I) have been deleted.
- A new clause is included in Section 5.3.7.4 – Pipes in private property. This clause advises that building over pipelines are not recommended. Approval to build over pipelines is to be obtained from Council, who may set conditions. Alternatives options such as relocating building or diverting pipeline should always be considered. This clause was previously in NZS4404:2004 in Wastewater section 4.3.3.3.
- Section 5.3.10.5 – Connection depth – rodding point is now to be constructed in the road reserve. Previously the rodding point was to be inside the property boundary. The revised configuration of the connection rodding point allows for better network management. The move has the added benefit of allowing easier detection of Council assets by any future trenchless technology

Part 6: Water Supply

- Reference to NZS4404:2010 has resulted in the re-numbering and re-ordering of a number of sections in Part 6. Cross referencing has consequentially been updated.
- Provisions that are now contained in NZS4404:2010, which were in the Engineering Document 2012 (District Plan Appendix I) have been deleted.
- The following new sections are as a result of clauses which were included in NZS4404:2004 being removed from NZS4404:2010. Whanganui District Council wish to retain these clauses, so they have been added to this document:

- Section 6.2.3 – System review requirements.
- Section 6.3.5.2.1 – Impact of consequential change. Requirement for an assessment and risk analysis to evaluate and assess the impact of environmental and property damage in the event of a major water main failure.
- Section 6.5.4 – Pressure testing of water mains– NZS4404 directs the reader to Appendix C for the appropriate testing procedure. This section provides a replacement calculation to be used in place of the equation located in (c) in the standard. The reason behind this inclusion is that the previous calculation was incorrect, and had a missing component. This clause corrects that mistake.

Part 7: Landscape

- Reference to NZS4404:2010 has resulted in the re-numbering and re-ordering of a number of sections in Part 7. Cross referencing has consequentially been updated.
- Provisions that are now contained in NZS4404:2010, which were in the Engineering Document 2012 (District Plan Appendix I) have been deleted.
- Changes to Part 7 are largely a result of new documents set out in section 7.1. The contents of these new documents have been extracted and included in the Engineering Document 2016 (District Plan Appendix I) for consistency across documents. Consistency between the Tree Strategy and the Engineering Document 2016 is the reasoning behind the new sections and clauses detailed below:
 - Section 7.2.1 – Concept stage requires that consultation with the Council on landscape design and construction at an early stage is required, rather than as recommended as per NZS4404:2010.
 - Section 7.2.4 – Ecological, functional and aesthetic opportunities – new introduction paragraph that expands on the introduction sentence contained in NSZ4404:2010.
 - Section 7.2.6 – Street landscaping – new clause requiring layout and density of planting to be approved by Council as per 7.2.1, and advising that where specimen trees are to be planted, there shall be no fewer than at least one tree per two properties. These requirements were previously required in this section but in different wording and included new cross reference to 7.2.1.
 - Section 7.3.1 – Location, removes edible gardens from the list of planting. Edible gardens are included in NZS4404:2010.
 - Section 7.3.4 – new trees and road geometry – new provision requiring a minimum berm width of 1.5m to allow for sufficient root development.
 - Section 7.3.5 – planted grass areas, berms, swales or rain gardens – new provision advising that when swales are used in conjunction with

tree planting, that the berm be off a sufficient width to allow for trees to reach maturity without affected the water drainage capabilities of the swale.

- Section 7.3.6 – species selection – deletion of two matters to be considered that were added into NZS4404:2010 – (a) suitability of eco-sourced native plants with respect to local biodiversity, and (h) safety such as toxicity. (a) has been removed as it is not an overriding principle, and (h) has been removed as it is too limiting.
- Section 7.4.4.2 – planting grass areas – two new clauses. Heavily compacted soil to be ripped prior to the laying of topsoil, and other special purpose grass seed and plant species may be used in special areas.
- Sections 7.4.6.1-3 – specimen tree planting – new provisions over three sub-sections. These include measurement of specimen trees, reference to the Tree Strategy 2016, recommended height for specimen trees and ground cultivation.

Part 8: Network Utility Services

- Part 8 was previously 'Reserves'. It is now Network Utility Services, and contains entirely new provisions. The contents of this chapter has originated from the Power, Telecommunications and Gas chapter.
- New provisions include:
 - Requirement to install fibre cabling (Sections 8.2.3 and 8.4.1). This requirement is formalising a requirement which has been placed upon all urban developments through consent conditions since Ultrafast Fibre began installing ducting in Whanganui.
 - Additional reference documents and requirements to be considered in the preparation of engineering plans. These relate to gas distribution, transport corridors and electrical safe distances (Section 8.3.1.1). This was a requirement in previous section 9.2 (c), but in different wording. The new wording improves clarity and is similar to that used by New Plymouth District Council.
 - All services to be installed to the utility's satisfaction, and the need to supply a completion certificate prior to applying for a Section 224 certificate. This is already required, but this has been expanded to ensure that Council is confident that the utility service providers are happy with the location, quality and as-built information provided by the developer. Utility companies have expressed concerns to Council that the current document only requires telecommunication certificates and not sign off by other providers.

Appendices

- Appendices of the Engineering Appendix have been re-ordered in line with NZS4404:2010 as follows:
 - New appendix A comes from old appendix G.

- New appendix B comes from old appendix A.
- New appendix C is new.
- New appendix D comes from old appendix C
- Contents of appendix E are new.
- New appendix F comes from old appendix E.
- New appendix G comes from old appendix F.
- New appendix L comes from old appendix N.
- New appendix M comes from old appendix O.
- New appendix N comes from old appendix Q.
- Appendix A has had the addition of Hansen as an approved medium density polyethylene pipe.
- Appendix B has had the following changes:
 - An additional Rural Residential roading drawing is added, the subsequent renumbering of other drawings.
 - A new drawing relating to new sanitary lateral connection to main 1.5m deep or less (common details), and then the subsequent renumber of other drawings.
- Appendix C contains new provisions.
- The old provisions from appendix B have been deleted as NSZ4404:2010 contains all of this information.
- Appendix D has had an existing clause (which has was copied from previous appendix c) amended. This amendment relates to the deletion of instructions for actions to be taken after flushing of the main to remove debris and air. This removal is a result of the greater detail on testing information in NZS4404:2010 than the previous version. The wording of the added note D4 is for clarity.
- Appendix E is a new section in NZS4404:2010. Only clause included is 'no change'.
- The following Appendices have had no material changes:
 - Appendix F
 - Appendix G
 - Appendix H – only change is the title of the appendix. No change to contents.
 - Appendix J
 - Appendix K
 - Appendix N
- Appendix I has a number of new clauses. These are:
 - Section 1.5 Access and works on private property: in summary, this section requires the construction access to be of a condition to ensure that no debris is deposited onto adjacent roads during construction. The developer is to be responsible for all costs (direct and in-direct) for any clean-up work required. This has been added to provide detail around common construction issues not previously addressed.

- Section 1.7 Developer's amenities and establishment: the developer shall provide details of the management of a number of points. This has been added to tidy up site management issued which have occurred since the last update.
- Section 1.9 Normal working hours: WDC may restrict hours of work and normal hours are 7.30am-6.00pm Monday – Saturday. This provides the ability for Council to limit the hours of works if it creates a negative impact on the surrounding area.
- Section 2.6 Temporary drainage and erosion control: requirement that the developer provides a detailed sediment and erosion control plan prior to the commencement of works on site. This is a minimum requirement to ensure compliance with Horizons Regional Council's requirements.
- Section 4.8 Pipeline construction – Drainage: Where conflict exists between the NZS4404:2010 Appendix C and the technical specification Section 4.8, the WDC development engineer shall determine which takes precedence. This provides clarity around decision making in the event of a clash in requirements.
- Section 5 Pipeline construction – Water supply: Where conflict exists between NZS4404:2010 and the technical specification, the WDC development engineer shall determine which takes precedence. This provides clarity around decision making in the event of a clash in requirements.
- Section 11.5.4 - Kerb and channel, footpath and vehicle crossing construction: Inspection and testing – the prepared base shall have a minimum CIV of 35 and be tested at 5m intervals. This has been included to address a quality control point insufficiently explained in the current engineering document.
- Appendix L has one new clause, with regards to testing - Kerb base CIV 35 at 5m centres along length. This has been added to address a quality control point insufficiently explained in the current supplement.
- Appendix M has a number of changes, which update references and cross references. These include:
 - Addition of instruction that all references to NZS4404 should be read in conjunction with WDC Supplement Document 2016.
 - Updating of reference from NZS4404:2004 to NZS4404:2010.
 - Updating of reference from WDC Supplement Document 2012 to WDC Supplement Document 2016.
 - Updating of section references from NZS4404:2004 numbering to NZS4404:2010 numbering.
 - Updating of section references from WDC Supplement Document 2012 to WDC Supplement Document 2016 numbering.
- The following appendices have been deleted:
 - Appendix O. Engineering checklist has been moved to appendix M.

- Appendix P has been deleted in its entirety. This appendix did not previously contain any contents.
- Appendix Q. Performance standards have been moved to appendix N.

Drawing Register and Drawings

- The only changes to the drawing register is the updating of new section and appendices headings.
- Changes to the drawings include:
 - All drawings have had Council logo and Council name updates.
 - RD-WDC Path 1.5m wide, previous version was 1.4m (width adjustments to match specifications).
 - Revised rodding point (as detailed above).

Chapter 12 – Parking, Loading and Vehicle Crossings

The only changes proposed to this chapter is updating references to NZS4404 from 2004 to 2010, and from the Whanganui District Council Engineering Document 2012 to 2016.

Chapter 13 – Subdivision and Infrastructure

Changes to this chapter are for three reasons.

Firstly, any reference to NZS4404 is updated from 2004 to 2010, and to the Whanganui District Council Engineering Document from 2012 to 2016.

Secondly, there are a number of changes proposed to objectives, policies and performance standards to incorporate proposed deletions from Chapter 23 – Assessment Criteria which are not already covered by existing objectives, policies, performance standards or the Engineering Document.

Thirdly, there are a couple of changes proposed resulting from changes within the Engineering Document.

Changes include:

- Minor wording changes to Objectives 13.2.2, 13.2.3 and 13.2.4. These are to reflect assessment criteria deleted from Chapter 23.
- New policy 13.3.5B, which seeks to ensure that infrastructure provides for the maximum potential demand form development.
- New policy 13.3.20A, which is a provision copied from Chapter 23 with respect to section 224, and the bond or deferral of vehicle crossings or connections to infrastructure.
- Deletion of policies 13.3.24 and 13.3.25, and replacement with new wording of policy 13.3.24 to incorporate both original policies and cover provisions in the assessment criteria.

- New policy 13.3.26A, which seeks to ensure a whole catchment approach is used in the design, construction and operation of stormwater, water and wastewater infrastructure.
- New policy 13.3.26B, which is a provision copied from Chapter 23, which guides assessment of additional mechanical pump stations.
- New policy 13.3.27A, which details how proposals that do not have sufficient available servicing capacity or supply are to be managed.
- Amendment to policy 13.2.28, to include how proposals using the alternative design procedure are to be assessed.
- Amendment of policy 13.3.33 to exclude specific foundation design and construction.
- New policy 13.3.33B, which looks to ensure that earthworks on development sites maintain existing topography, significant natural features and hydrological flows while ensuring a number of matters.
- Amendment of policy 13.3.34, to include additional matters previously contained in chapter 23.
- New policy 13.3.34A, which is a provision copied from Chapter 23, which provides guidance on assessment of building platforms, NZECP:34 2001 and the electricity corridor.
- Amendment of policy 13.3.35, to ensure that proposed subdivision directly adjoins existing residential development in the Springvale Indicative Future Development Area.
- Amendment of policy 13.3.38, to add that sufficient existing capacity must be available in the infrastructure catchment with respect to the Springvale Indicative Future Development Area.
- New policy 13.3.43, which seeks to ensure that where infrastructure and network utility connections cross private land, that appropriate provision and legal protection of private connections are provided.
- New policy 13.3.44, which seeks to ensure that subdivision development avoids significant costs to connect to network utilities.
- New policy 13.3.45, which seeks to ensure that where infrastructure and network utility infrastructure is to be vested in council, that efficient public access to public infrastructure for operational and maintenance purposes shall be achieved.
- Amendment of the 'Note' at the beginning of section 13.5, to make reference to the Engineering Document clear.
- Amendment of performance standard 13.5.5 (a) and (b) to ensure that infrastructure shall be provided with easements and constructed in accordance with the Engineering Document and the NZS4404.
- Amendment of performance standard 13.5.6 (b)(iii) to include inundation.
- Amendment of performance standard 13.5.6 (e) to include the note that any on-going requirements will be required to be detailed and secured by consent notices.

- Amendment of performance standard 13.5.8 (e) to require fibre cabling to be installed in accordance with the Engineering Document.
- Amendment of performance standard 13.5.9 (h) to update reference to the NZS4404 and Engineering Document.
- Amendment of performance standard 13.5.10 (h) and (j) to update reference to the NZS4404 and Engineering Document.
- Amendment of performance standard 13.5.11(a) to update reference to the NZS4404 and Engineering Document.
- Amendment of performance standard 13.5.13 to update reference to the NZS4404 and Engineering Document.

Chapter 23 – Assessment Criteria

Assessment criteria have been deleted from the following sections:

- 23.7 Subdivision Part II
- 23.8 Vehicle access, parking and signage
- 23.9 Transport infrastructure
- 23.10 Water infrastructure
- 23.11 Wastewater infrastructure
- 23.13 Earthworks (Associated with Subdivision)
- 23.15 Streetscape and Landscaping
- 23.16 General Urban Design Criteria

Section 23.17 Earthworks remains, however reference to the NZS4404 and the Engineering Document have been updated.

Deletion of assessment criteria is proposed, where these criteria are found within existing objectives, policies, NZS4404 or the Engineering Document 2016. Where assessment criteria are not already contained in other provisions, these have been deleted from Chapter 23 and incorporated by amendment or new provisions in Chapter 13.

- 2.3.2 Council is completing a phased review of the District Plan. Section 70 of the Resource Management Act 1991 requires that where provisions have been reviewed and no changes are proposed, the existing provisions must still be publicly notified as if it were a change.

3. PART 2 – SECTION 32 EVALUATION

3.1 REQUIREMENT TO MAKE AN EVALUATION

The Resource Management Act 1991 (the Act) requires that when a Council undertakes a plan change it must produce a report evaluating the proposed provisions. This is known as a Section 32 Report. This report contains an evaluation of the proposed Plan change, prepared in accordance with section 32 of the Resource Management Act (as amended 2013).

The evaluation examines:

- *the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act (to promote the sustainable management of natural and physical resources), and*
- *whether, the provisions are the most appropriate way to achieve the objectives by*
 - *identifying other reasonably practicable options for achieving the objectives; and*
 - *assessing the efficiency and effectiveness of the provisions in achieving the objectives; and*
 - *summarising the reasons for deciding on the provisions; and*
- *contain a level of detail that corresponds to the scale and significance of the environmental, economic, social and cultural effects anticipated from the implementation of the proposal.*

For the purposes of this examination, the evaluation must:

- *Identify and assess the benefits and costs of the environmental, economic, social and cultural effects that are anticipated from the implementation of the provisions including the opportunities for –*
 - *economic growth that are anticipated to be provided or reduced; and*
 - *employment that are anticipated to be provided or reduced; and*
- *if practicable, quantify the benefits and costs referred to above; and*
- *assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.*

3.2 CONSIDERATION OF METHODS

- 3.2.1 While the use of non-regulatory methods such as management plans, by-laws, education and information provisions have been taken into account, as a primary option these were not considered to be an appropriate standalone option for achieving the objectives of the Plan or the Act. It is therefore deemed most appropriate to maintain non-regulatory methods as supplementary to regulatory approaches. In investigating the best regulatory method of achieving the objectives of the proposed Plan change, three options were identified and considered.

3.2.2 The options considered are as follows:

Options	Explanation
Option 1 Maintain the Status Quo – Do nothing.	Leave Plan as it is.
Option 2 Update to reference NZS4404:2010 and the Engineering Document 2016.	Update the provisions to give effect to documents produced since the Plan was last reviewed.
Option 3 Review all relevant sections of Chapters 12, 13 and 23 taking into account community values and update Appendix I with reference to the Engineering Document 2016.	Review all parts of Chapters 12, 13 and 23 that are relevant to NZS4404, the Engineering Document 2016 and infrastructure and subdivision, together with community consultation in order to create provisions that reflect local values as well as meet regional and national standards.

Each of these identified options is discussed in detail below.

One of the aims of Section 32 analysis is to identify a preferred approach as being more efficient and effective approach than other options in achieving the key objectives listed above which reflect the objectives of the Whanganui District Plan and the Act. The benefits and costs of each option are illustrated below.

	Benefits	Costs
Option 1 – Status Quo/ Do Nothing	Least financial cost in processing the Plan change due to less research. Retain familiarity with the existing objectives, policies and rules.	Cost of Plan change process. Inconsistency between Engineering Document 2016 and old Engineering Document 2012 referenced in the District Plan. Increased consent processing costs due to inconsistency. Council not fulfilling obligations under the Act.
Option 2 – Update to reference NZS4404:2010 and Engineering Document 2016.	Minimal changes to the Plan by changing Appendix I and references to it.	Cost of Plan change process. Shortcomings in current rules and policies not fully addressed.
Option 3 - Review all relevant sections of Chapters 12, 13 and 23 taking into account community values. (Option 2 plus remove assessment criteria duplication)	Statutory obligations of Council fulfilled. More certainty for developers and owners on the type of work permitted and how applications will be assessed. Simplified and streamlined Plan, with minimal duplication. Plan effectiveness and efficiency addressed.	Cost of Plan change process.

3.2.3 Analysis of Options

Option 1: Maintain the Status Quo (Do nothing)

Maintaining the status quo is an option that needs to be considered. This would simply involve the retention of the existing District Plan provisions.

Maintaining the status quo would result in a situation where there is inconsistency between what Council requires under the Engineering Document 2016, and what is enforced through subdivision consents under the District Plan. It would result in less statutory weight to the new provisions of the 2016 version of the document and significant confusion for Plan users.

As a result of these findings and taking into account the risk of acting or not acting it is considered that maintaining the status quo would not provide sufficient protection for the District's existing and proposed subdivision, and associated earthworks, roading, stormwater, wastewater, water, landscaping and network utilities nor would it fulfil Council's statutory obligations under the Act. Therefore, it is not considered to be the best method available.

Option 2: Update to reference NZS4404:2010 and Engineering Document.

Since the last revision of the Engineering Document in 2012, it has become apparent that updating the Engineering Document to incorporate the changes to NZS4404:2010 would create efficiencies in assessment of subdivision consent applications and activities involving those activities contained in the Engineer Document.

If Council was to proceed with the option of updating the Plan to reference these documents, then the purpose of a District Plan would not be met. However, the duplication that exists between the Engineering Document 2016 and the Assessment Criteria would remain. Confusion for Plan users would still be likely.

This option is not therefore considered to be an efficient and effective approach for addressing current inaccuracies and meeting the statutory obligations of the Act.

Option 3: Review all relevant sections of Chapters 12, 13 and 23 taking into account community values as well as national and regional documents.

This method would build on option 2 by addressing the shortcomings of not including updating the provisions of the plan that relate to the Engineering Document and NZS4404, while also addressing the issue of duplication of provisions.

As stated in section 2.1 of this report, the proposed changes to objectives, policies, performance standards and assessment criteria seek to update the Plan to provide for the updating of the Engineering Document to take into account best practice in the form of NZS4404:2010. This results in minimal duplications of provisions.

The community feedback and review of the existing provisions has resulted in a few minor changes to the Engineering Document to update provisions from reference of outdated Regional Plans to the One Plan.

Therefore, option 3; including community viewpoints is recommended because it is considered to be the most efficient and effective way to protect the environmental values identified, with the best outcomes in terms of the environmental, social/cultural and economic costs and benefits.

3.2.4 Appropriateness of the Plan Change

Whether or not the Plan change is necessary or appropriate is directly linked to Sections 5, 6 and 7 of the Resource Management Act 1991. This Plan change is considered necessary to achieve the purpose and principles of the Act because it meets the following:

Other matters

(b) the efficient use and development of natural and physical resources

The proposed changes to Chapters 12, 13 and 23 and the amendment of the Engineering Document will ensure that subdivision, and associated earthworks, roading, stormwater, wastewater, water, landscaping and network utilities is undertaken in a manner that ensures the efficient use and development of natural and physical resources.

3.2.5 Conclusion & Recommended Option

Various Council staff and the community have been involved in undertaking a significant amount of work and consultation to ensure that Council has sufficient information to prepare a Plan change. The Council has not relied on any uncertain or insufficient information, but has undertaken research to ensure the subject is adequately understood and recommendations are wisely founded.

It is considered that the reviewed objectives, policies and rules are the most efficient and effective means available to Council to preserve and enhance the key natural environment features of the Whanganui District.

3.3 PROPOSED ISSUES

Although not required by the Act, the identification of resource management issues is generally provided for in most district plans. It provides a base to develop suitable objectives and policies that are relevant to the local circumstances or context. No new issues or changes to existing issues are proposed.

3.4 PROPOSED OBJECTIVES

13.2.2 Subdivision and infrastructure development that demonstrates the following qualities of good urban design ~~defined in the New Zealand Urban Design Protocol:~~

- a. Context - an understanding of the setting in which the subdivision occurs, including significant vegetation, historic heritage and amenities to enhance the surrounding area.
- b. Character - an understanding of existing natural and physical features including trees, waterways, viewshafts, historic heritage and significant topographical features of the subject site and surrounding areas.
- c. Choice: ~~and~~ d. ~~Connections~~ — Linkages between the roading network, recreation spaces, other neighbourhoods and natural features; use of green connections and corridors, the degree of permeability of the roading layout and incorporation of multi modal transport options.
- e. Creativity — Enabling connections with places of value in the community and/or providing places for community interaction.
- f. Collaboration — Engagement with the affected community including Iwi and interest groups.
- g. Crime Prevention through Environmental Design (CPTED) - Safe, direct routes and connections; Good visibility, sightlines and casual surveillance (overlooking) of public or publicly accessible spaces; Appropriate lighting and illumination for the anticipated uses of a space.

13.2.3 Subdivision and infrastructure development that:

- a. Performs its function effectively and efficiently.
- b. Is flexible in design.
- c. Provides resilience to natural hazards and local conditions.
- d. Is durable over its lifespan.
- e. Provides capacity and connectivity in reticulated services for the intended future land uses in the catchment.
- f. Provides for ongoing maintenance in an effective, efficient and cost effective manner.
- g. Achieves lifecycle costs that are affordable to the community.
- h. Takes into account the risk of climate change
- i. Is consistent with any relevant Servicing and/or Structure plans.

13.2.4 Subdivision and development in Whanganui that does not compromise and is compatible with the effective operation, maintenance, upgrading and development of existing network utilities.

Comment	<p>Amendments are proposed to objectives 13.2.2, 13.2.3 and 13.2.4. The amendments to all three objectives are a direct result of the deletion of provisions from Chapter 23.</p> <p>The amendment to 13.2.2 includes elements of assessment criteria taken from Chapter 23, with regards to urban design.</p> <p>The amendment to 13.2.3 adds the requirement for subdivision and infrastructure to perform its function both effectively and efficiently. The amendment also adds the requirement to provide resilience to local conditions as well as the existing requirement for natural hazards. The amendment adds the provision of connectivity in reticulated serves. The amendment also expands on ongoing maintenance in an effective, efficient and cost effective manner.</p> <p>Amendment to objective 13.2.4 includes the requirement to ensure that subdivision is also compatible with the effective operation, maintenance, upgrading and development of existing network utilities.</p>
Summary of benefits	Clarification and improved awareness of requirements of subdivision and infrastructure proposals.
Summary of costs	No increased cost implications although the community will be in a position to make better informed decisions on what subdivision and infrastructure is required to achieve.
Effectiveness	The amended objectives are effective as they will ensure improved understanding and will support better informed decision making.
Efficiency	The amended objectives are efficient as improved understanding will support better informed decision making. They reduce duplication between Chapter 13 provisions and the previous assessment criteria, which have been deleted as a result of these changes.
Appropriateness	The proposed amendments to objectives are to enable the deletion of assessment criteria from Chapter 23. The assessment criteria were previously part of the Plan, and therefore the amendments are to ensure that all criteria which are being transferred from one part of the Plan to another are included. The objectives are appropriate as they ensure that consent applications are assessed against all of the relevant subdivision and related requirements.
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	As the objectives are being amended to include assessment criteria previously contained in a different section of the District Plan, it is considered that the risk of acting is very low. No changes to assessment of subdivision applications will result, rather it improves efficiencies. Clarification of the proposed objectives will provide for better decisions and the ability to manage effects better.

3.5

PROPOSED POLICIES

13.3.5B Infrastructure shall provide for the maximum potential demand arising from the development of allotments, including future land uses as anticipated by the District Plan, unless that land is constrained by hazards.

13.3.20A Applications to defer the construction of vehicle crossings after the issue of a Certificate pursuant to Section 224 shall be approved entirely at Council's discretion. In addition the following shall also apply:

- i. The applicant shall be required to provide information to establish that either:
 - damage to the formation of the crossing will occur prior to the establishment of the land use served by the crossing; or
 - there are multiple locations for a complying vehicle crossing available; and,
- ii. A cash bond may be taken in lieu of works of an amount appropriate to the satisfaction of the Development Subdivision Officer.
- iii. This does not apply to crossings serving multiple lots or where there is only one location for a complying crossing, or for a crossing that has been approved in a specific location but does not comply.
- b. Excluding vehicle crossings, where applications to bond or defer the construction of connections or infrastructure until after the issue of a Certificate pursuant to Section 224 these shall be approved entirely at Council's discretion. In addition the following shall also apply:
 - i. The applicant shall be required to provide information to establish that either:
 - That damage to the infrastructure will occur prior to the establishment of the land use served by the crossing; or
 - In the case of vegetation and landscaping, that the subdivision is otherwise finished but is currently outside appropriate planting/growing season, and;
 - Where the infrastructure is to be vested in another party, the approval of that party must be supplied.
 - A cash bond may be taken in lieu of works of an amount appropriate to the satisfaction of the Development Engineering Officer.

13.3.24 With the exception of lots for network utilities, all subdivision and infrastructure development within the urban boundary shall ensure that each allotment is provided with connections to reticulated services that provide levels of service for water, wastewater, and stormwater. Require new allotments within the urban boundary to connect to reticulated wastewater network, excluding lots for network utilities.

13.3.25 Require new allotments in the within the urban boundary to connect to reticulated potable water network, excluding lots for network utilities.

13.3.26A A whole catchment approach shall be used in the design, construction and operation of stormwater, water and wastewater infrastructure through subdivision and infrastructure development. New and extended reticulation shall be compatible with existing and potential future upstream and downstream infrastructure.

13.3.26B Mechanical pump stations.

Subdivision proposing or requiring the installation of additional mechanical pump stations shall be assessed on the following:

- i. The availability and viability of alternative servicing arrangements for that land;
- ii. Whether the land is developable without the use of a pump station;
- iii. The costs of operation and maintenance over the lifetime of the station;
- iv. Whether or not the land serviced by the pump station is zoned for further intensive development;
- v. The degree of risk associated with failure of that pump station

13.3.27A Where there is not sufficient available servicing capacity or supply for a proposed development, the development shall:

- a. Provide a suitable alternative method for servicing and associated connections that has been approved by the way of the Alternative Design Procedure; and/or
- b. Create supply or capacity in accordance with the requirements of this Plan, NZS 4404 2010 and the Engineering Document 2016 to service the proposal at the subdividers cost; and/or
- c. Provision of on-site attenuation, retention or mitigation of peak and/or total flows to create pre and post development hydrological equilibrium where practicable in the case of stormwater, or
- d. The deferral of the completion of a proposal until such time as Council provides capacity where upgrades to any network is programmed, or provisions are made for Council to provide that capacity where works are proposed in an existing capital works programme.

13.3.28 Require the assessment for the approval of alternative infrastructure solutions to be processed through the Alternative Design Procedure and meet the assessment criteria for quality urban design and infrastructure. The design shall be assessed against the proposal's ability to achieve the following:

- a. The design alternative proposed is functional with the subdivision layout proposed.

- b. The alternative does not constrain the ability for connectivity to infrastructure serving other land zoned for development, nor the ability of that land to be developed.
- c. The design alternative meets all the relevant general infrastructure and specific infrastructure requirements and criteria.
- d. Alternative solutions reflect industry best practice.
- e. In the case of design, alternative solutions are approved by the relevant network or infrastructure provider in which it will be.
- f. In the case of construction and materials, alternative solutions shall be approved by the relevant network or infrastructure provider in which it will be vested prior to an application for a certificate pursuant to Section 224 of the Resource Management Act being made.
- g. The required levels of service for infrastructure are maintained.
- h. The ongoing lifecycle needs costs of maintenance are comparable to those in NZS 4404 2010 2004 and the Engineering Document 2016.

13.3.33 Avoid the creation of new residential allotments that require significant additional engineering works (excluding specific foundation design and construction) to provide for building development.

13.3.33B Earthworks on development sites shall maintain existing topography, significant natural features and existing hydrological flows while ensuring:

- a. retention of topsoil on proposed allotments;
- b. avoidance of soil runoff as a result of earthworks; and
- c. avoidance of discharging sediment from earthworks onto roads or into stormwater or wastewater infrastructure by the development and approval of a Sedimentation Management Plan that identifies methods to be used to manage any off-site disposal of soils.

13.3.34 Ensure that applications for subdivision and intensified land use activities:

- a. Can achieve an appropriate level of service for telecommunication, electricity and gas networks for that allotment and/or use prior to the granting of subdivision consent, and
- b. That any specific technical requirements to achieve (a) are considered prior to the issue of a certificate pursuant to section 224 of the Resource Management Act.
- c. Maintain existing topography, significant natural features and existing hydrological flows as far as practicable.
- d. Include details any proposed allotment that has undergone significant construction or reconstruction including cut, fill or that is subject to overland flows or natural hazards.
- e. Identifies any specific requirements for low impact stormwater solutions including appropriate soil conditions, maintenance provisions and costs, and life cycle.

13.3.34A Building platforms, NZECP: 34 2001, and the electricity transmission corridor.

For subdivision that creates allotments that do not comply with Rule 13.5.6 (b) (vi and vii), the following assessment criteria apply:

- a. The extent to which the design, construction and layout of the subdivision (including landscaping) allows for activities to be set back from Electricity lines to ensure adverse effects on and from them and on public health and safety are appropriately avoided, remedied or mitigated.
- b. The provision for the ongoing operation, maintenance and planned upgrade of Electricity lines.
- c. The risk to the structural integrity of the Electricity lines.
- d. The extent to which the subdivision design and consequential development will minimise the risk of injury and/or property damage from Electricity lines.
- e. The extent to which the subdivision design and consequential development will minimise the potential reverse sensitivity and nuisance effects of Electricity lines.
- f. Outcomes of consultation with the affected lines owner.

13.3.35 Require all subdivision and development in the Springvale Indicative Future Development Area to proceed generally in accordance with the provisions of the Springvale Indicative Development Plan to ensure that:

- a. Stormwater is managed comprehensively and not in an ad-hoc manner.
- b. The transport network is consistent with the Wanganui Urban Transport Strategy 2011, and the indicative roading layout.
- c. Encourages connectivity of services and land uses with public open space.
- d. Quality urban design outcomes are achieved.
- e. Infrastructure is developed in a logical sequence, and generally designed and located as shown on the Springvale Indicative Development Plan.
- f. Proposed subdivision directly adjoins, and is a logical extension to, existing development of residential scale and allotment size.
Proposed allotments shall be of residential size.

13.3.38 Avoid any land use and/or subdivision development that allocates reticulated infrastructure intended to service the Springvale Indicative Future Development Area to other areas. Sufficient existing capacity must

	<p><u>be available in the infrastructure catchment to provide for the scale of development proposed.</u></p> <p>13.3.43 <u>Ensure that where infrastructure and network utility connections cross private land, that appropriate provision and legal protection of private connections to infrastructure and network utility services is provided.</u></p> <p>13.3.44 <u>Subdivision development shall avoid significant costs to connect to network utilities, including any requirement to provide for additional capacity, after the issue of a Certificate pursuant to Section 224 of the Resource Management Act 1991.</u></p> <p>13.3.45 <u>Where infrastructure and network utility infrastructure is to be vested in Council, efficient access to public infrastructure for operational and maintenance purposes shall be achieved by ensuring that sufficient land area is vested and or easements provided. Additional vested land area or easements shall be required to accommodate factors such as topography and the location of other infrastructure.</u></p>
Comment	<p>As discussed in section above, the proposed amendments and new policies consist of three types of changes. Firstly, updating of reference to NZS4404 from 2004 to 2010, and updating of reference to the Engineering Document from 2010 to 2016. Secondly, there are some minor changes to policy directly resulting from changes to the Engineering Document. Thirdly, there are numerous changes proposed to enable assessment criteria in Chapter 23 to be deleted.</p>
Benefits	<p>Social/Cultural</p> <p>These policies recognise the significance of subdivision and associated infrastructure to the District and its residents. It provides for subdivision and associated infrastructure to continue to provide for the community's ability to provide for their social and economic wellbeing.</p> <p>Economic</p> <p>The new policies provide more certainty for developers about requirements for subdivision and infrastructure development. It provides efficiencies in assessment in the removal of duplication between Chapter 23 assessment criteria and the objectives and policies in Chapter 13.</p> <p>Environmental</p> <p>The better defined policies will ensure proper processes are followed to consider any adverse effects.</p>
Costs	<p>Economic</p> <p>These policies may restrict the development potential in certain areas due to the cost of consent and potential mitigation measures. However, these costs are currently being borne by developers as the majority of the policy changes come from ensuring that all of the existing assessment criteria are incorporated into the policies.</p>

	Cultural These policies may potentially affect the cultural uses of land.
Effectiveness	These policies are effective as they create more precise guidance for decision makers. They provide an effective framework to achieve the objectives by providing mechanisms to ensure that subdivision and infrastructure is planned and constructed in an efficient and effective manner.
Efficiency	These policies are efficient as they create more precise guidance for decision makers. They provide an efficient way to achieve the objectives as the benefits of ensuring that subdivision and infrastructure are correctly provided outweigh the costs. The changes remove unnecessary duplication.
Appropriateness	These policies are appropriate as they create more precise guidance for decision makers. They are in accordance with the relevant documents.
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	Council considers there is sufficient information regarding the subject matter of the above policies. The risks of not updating reference documents, and including elements of assessment criteria will result in development occurring in a manner not consistent with best practice and therefore less no consideration of the long term environmental, economic and cultural effects.

3.6 PROPOSED RULES

The following methods have been identified as being suitable for achieving the relevant objectives and policies outlined above.

3.6.1 Rules

A review of the existing rules applying within Chapters 12 and 13 was completed. The only changes proposed are minor changes to the performance standards to ensure consistency with the Engineering Document 2016. This is considered the most appropriate way to achieve the objectives and purpose of the Act.

13.5.6 Site suitability.....

- b. In addition, the identified building platform shall be required to meet the following requirements:
 - iii. Shall not be subject to material damage by inundation, erosion, falling debris, subsidence, or slippage.....
- e. Where ground conditions cannot be certified as meeting the above, or where significant works or specific foundation design is required, a supporting geotechnical report from a suitably qualified and experienced professional shall be provided detailing the suitability of the site for the future intended development.

The report shall also outline any restrictions or conditions that may be required prior to the grant of a certificate pursuant to Section 224 of the Resource Management Act and any on-going restrictions after the issue of that certificate.

Any on-going requirements will be required to be detailed and secured by consent notices.

Comment	<p>The operative performance standards require compliance with NZS 4404:2004 and the Engineering Document 2010. The proposed changes update these reference documents to the NZS 4404:2010 and the Engineering Document 2016. Changes also include provisions that require updating to be consistent with requirements in the Engineering Document 2016. These have not been reproduced above.</p> <p>Other changes such as the inclusion of 'inundation' in Rule 13.5.6 (b) (iii) and details relating to consent notices in Rule 13.5.6 (e) relate to ensuring assessment criteria to be deleted from Chapter 23 are fully incorporated into Chapter 13. These are shown above.</p> <p>No changes to activity status or the rule structure are proposed.</p>
Benefits	<p>Environmental – Updating of reference to the NZS4404:2010 and the Engineering Document 2016 will improve the management of natural and physical resources through the updating of requirements in line with best practice.</p>

	<p>Economic – The updating of references to the NZS4404 and the Engineering Document reduces duplication between provisions. Incorporating provisions from the assessment criteria assists applicants and council planners by reducing the number of provisions requiring assessment, and therefore reduces cost of preparing and processing applications.</p>
Costs	<p>Economic – Administrative and consultation costs for Council associated with processing applications and assessing compliance.</p> <p>Social & Cultural – These performance standards may potential effect the cultural uses of land.</p>
Effectiveness	<p>This option will provide for a more effective management framework by clearly identifying which documents, applications are required to be assessed against. It enables assessment criteria in Chapter 23 to be deleted but the criteria to still be assessed as they are fully provided for within Chapter 13.</p>
Efficiency	<p>Specifying effects and matters to consider for resource consent applications is efficient and avoids unnecessary consent processes. Updating performance standards in line with changes to the Engineering Document will result in efficiencies in assessment as there will be consistency between the rules and the Engineering Document. It enables assessment criteria in Chapter 23 to be deleted as they are fully provided for within Chapter 13. This creates efficiencies in assessment processes.</p>
Appropriateness	<p>The updating of reference to the NZS4404 and the Engineering Document, the incorporation of changes to the Engineering Document in Appendix I, and inclusion of provisions to enable the deletion of assessment criteria are considered appropriate. They create more precise guidance for decision makers. They are in accordance with the relevant documents.</p>
Principal Alternative	<p>Council considers that there is sufficient information regarding the subject matter of the above rules that support the objectives and policies relating to subdivision, infrastructure, NZS4404:2010 and the Engineering Document 2016. The risks of not updating the performance standards would increase the likelihood of an inefficient consent process and therefore not achieve the objectives of the Plan.</p> <p>The principal alternative would be to maintain the status quo. However this would create inconsistencies between the Engineering Document, NZS4404, and best practice.</p>

3.7 PROPOSED ANCILLARY CHANGES

With the proposed changes to the rules, the Assessment Criteria (Chapter 23) will need to be altered to be consistent. In addition to ensuring consistency, a number of assessment criteria are proposed to be deleted, as they are either already contained in the objectives and policies or are contained in proposed amendments or new provisions. The changes have been identified as being suitable for achieving the relevant objectives, policies and rules outlined above.

Comment	As the objectives and policies in Chapter 13 have changed, the assessment criteria are no longer relevant. They are removed as the objectives, policies and performance standards provide criteria for assessment and the policies are expanded to provide greater guidance to decision makers.
Benefits	<p>Environmental & Economic – The Plan is clear and enables people to make decisions based on an established set of assessment criteria.</p> <p>Social & Cultural - continuation of a clear message in the Plan about how to achieve compliance.</p>
Costs	<p>Environmental & Economic – Existing costs are reduced as information will be clear and consistent.</p> <p>Social & Cultural – There will be less confusion as the assessment criteria are improved.</p>
Effectiveness	Removing the relevant assessment criteria will result in a better quality of application as AEEs will be clearly and simply based on the objectives, policies and performance standards instead.
Efficiency	Removal of assessment criteria that is no longer relevant will ensure that resources are efficiently targeted to the activities with implications for sustainable management.
Appropriateness	This approach is mirrored in plans throughout the country.
Principal Alternative	The main alternative to these assessment criteria deletion would be the status quo which results in assessment criteria which act more like policies and leaves the public more confused as to their rights which could prove costly to Council.

Comment	Changes to Appendix I (Engineering Document) are a result of its updating to align with NZS4404:2010 and update the provisions. There are some new Whanganui specific provisions included in the updated Engineering Document.
Benefits	Environmental & Economic – The Plan is clear and enables people to make decisions based on the most updated and recent version of the Engineering Document.

	Social & Cultural - continuation of a clear message in the Plan about how to achieve compliance.
Costs	<p>Environmental & Economic – Existing costs are reduced as information will be clear and consistent. Updates include deletion of duplications, to reduce duplication. There is the potential for increased costs to developers from the new Whanganui specific provisions.</p> <p>Social & Cultural – There will be less confusion as the duplications currently existing between the Engineering Document 2010 and NZS4404:2010 are removed.</p>
Effectiveness	Removing duplications between the Engineering Document and NZS4404 will result in a better quality of application as AEEs will be based on the most up to date documents. The updated Engineering Document will result in subdivision and infrastructure development that is effective in its purpose.
Efficiency	Removing duplications between the Engineering Document and NZS4404 will result in efficiencies of assessment of applications by Council's Engineers and Planners.
Appropriateness	The updating of the Engineering Document is considered appropriate. It will create more precise guidance for decision makers, and are in accordance with the relevant documents, including NZS4404.
Principal Alternative	The main alternative to the updating of the Engineering Document would be the status quo which results in inconsistencies and duplications between the NZS4404 and the Engineering Document. As both are referenced in performance standards, it is important to minimise inconsistencies between the two documents to prevent and minimise confusion.

APPENDIX ONE
Marked Up District Plan Text
Chapters 12, 13 and 23

***(Refer to Appendix Two for amendments
proposed to Appendix I of the District Plan)***

APPENDIX Two
Proposed Amendments to Appendix I
of the District Plan

***(Refer to Appendix one for amendments
proposed to Chapters 12, 13 and 23 of the
District Plan)***