

SECTION 32AA REPORT

(Amended extracts of notified S32 Report)

...Appendix 6 – PC46 – Scoping of Options Report, August 2016

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## 2. PART 1 – PROPOSED PLAN CHANGE

### 2.1 Description of the Proposed Plan Change

Historical data suggests an average increase of 67-75 dwellings per year in Whanganui. Council research has determined it is reasonable and prudent to assume that this demand for residential growth will continue into the future. Current forecasts suggest a population increase of 3.87% by 2043<sup>1</sup>.

With the current trend of less people per dwelling and a population increase expected in the long term there is residential development pressure. This is already becoming evident as indicated by the New Zealand Property Report (July 2017) which shows a decrease in house stock for sale of 25.8% over the last 12 months and a drop in the inventory of listings from 36 weeks to 13 weeks<sup>2</sup>.

It is Council's responsibility to provide guidance on where residential development should occur and to prevent ad hoc development. The key location considerations and a scenario for distribution of future housing demand were established in a desktop study in 2015. This scenario was then modelled to understand the implications for the stormwater and wastewater systems.

It is anticipated that there will be demand for 3000 new dwellings within the Whanganui District between 2016-2065. Analysis of supply of land indicates that although there are potentially 2333 new dwellings sites available, there is a significant mismatch between land supply 'location' and potential land demand 'location'. The majority of the supply locational shortfall is the Residential Zone including the Otamatea area.

The desktop growth study identified that during the period 2016-2065 a further 455 dwellings (an 85% increase) would be required as infill within the existing Residential Zone at Otamatea. To achieve this, the minimum density for dwellings would need to be 400m<sup>2</sup>.

Currently in the Otamatea area, there is a 1000m<sup>2</sup> density restriction called the 'Otamatea Development Overlay'. The overlay was put on the Plan as part of Plan Change 26 as a short term solution until the infrastructure modelling could be

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<sup>1</sup> <http://forecast.idnz.co.nz/whanganui>

<sup>2</sup> <http://www.realestate.co.nz/sites/default/files/2017-06/REA0254%20Property%20Report%20July%20202.pdf>

undertaken and Council could understand what services were available. Council now has completed the modelling and understands the capacity of the infrastructure network. Therefore the overlay is no longer required and restricts Council's ability to provide for urban residential capacity at Otamatea.

Conversely, within the existing Rural Lifestyle Zone over the next 50 years there could potentially be demand for 195 dwellings, whereas supply is estimated at 447 dwelling sites.

Te Kaahui o Rauru and the Whanganui Land Settlement Negotiation Trust have requested that the cultural values as outlined in the Interim Cultural Values Report October 2017, be recognised and protected. Namely that ancestral heritage be preserved and protected, along with the wellbeing of the land and its people, and the desire and right of tangata whenua to reconnect with ancestral lands. These submitters seek to retain the existing Rural Lifestyle zoning over the proposed Structure Plan area.

Given the extent of existing and projected demand for residential development, and the history of ad hoc development in the Otamatea area, it is unlikely that a 'do-nothing' option, will sustainably address either the key urban design or historic heritage issues, this area faces.

As a result of discussions with submitters, including Te Rūnanga o Tūpoho who submitted broadly in support of this Plan Change, other options were explored. Options considered sought to protect historic heritage values including cultural values to avoid damage, destruction or modification of archaeological sites as far as practicable, whilst also providing opportunities for high quality and well integrated residential development where appropriate.

Existing objectives and policies in Chapters 9 and 13 of the Plan, set the framework for protection of historic heritage including cultural and archaeological values. The introduction of a new definition of land disturbance and a new policy will provide for specific consideration of the location and siting of building platforms, alternative methods of works and the nature and form of any damage to archaeological sites. Subdivision and land disturbance activities will require a land use consent and will be assessed against any findings of an archaeological assessments and/or a cultural impact assessment and conditions of any Archaeological Authority from Heritage New Zealand. Consideration will also be given to any alternative locations or methods available for the activity. This creates opportunities to exclude land disturbance on specific areas within a development site where the historic heritage values are significant and adverse effects cannot be avoided, remedies or mitigated.

Therefore The purpose of PC46 is to re-zone some of the Rural Lifestyle land in Otamatea to Residential to provide for a higher density of development which would not have any adverse effect on the supply of the land for rural lifestyle development and provide for the additional residential demand in Otamatea. This development will be managed through the application of the 'Otamatea West Structure Plan Area' to provide quality urban design outcomes including integrated, cost effective and efficient infrastructure. At the same time, the Plan Change will remove the Otamatea Development Overlay (inserted as part of Plan Change 26) to allow for the infill at an appropriate density to occur.

The New Zealand Transport Agency has requested that specific consideration be given to the implications of PC46 on the State Highway network in the vicinity. An Integrated Transport Assessment was completed, which concludes that:<sup>3</sup>

1. An assessment of the worst performing proposed intersection, would perform at a LOS A overall or at a LOS B for the right-turn into the site at PM peak.
2. The sight distances to and from the proposed intersections appear appropriate;
3. Proximity of existing roads (Mannington Rd and Eaton Crescent) are in conflict with the safety and operation of the proposed roads and this is a concern, although site distances do not appear to be an issue. The left-turn and egress capacity are below standard.
4. Safety record is currently good within the urban zone.
5. For Road 1 a channellised left-turn layout is recommended, but would require careful design.
6. For Roads 1 – 3 a channellised right turn layout is recommended as a minimum.
7. For Road 4, given the lower speed environment and lower volume of turning traffic, could remain a priority T-intersection.
8. Lack of internal connectivity leads to potentially superfluous connections to the State Highway and appear contrary to urban design principles.

The report notes also that proximity to schools and playgrounds necessitates vehicle movements. It is intended that an open space area be provided within the Structure Plan area, although its location is not yet defined. Enquires with the Ministry of Education, as recorded in the Opus report, identify that no new schools are planned for the period to 2065 based on current projections. Generally thresholds are higher in provincial centres, for sustainable commercial, education and recreation areas within residential environments due to a typically lower density, proximity to town centres and an absence of appropriate public transport services.

The ITA report recommendations state that as a minimum to achieve good safety outcomes, all road linkages be restricted to the 70km/hr zone. This would mean that Road 1 would not be acceptable in its proposed location.

This is not considered a reasonable outcome at this Plan Change stage, as a number of potential design solutions exist to address safety concerns. These would be considered in detail as part of a subdivision consent application process, to which NZTA would be an affected party.

Otamatea West was selected as the area to contain this additional residential development as there is already development pressure in this area and Otamatea East has larger stormwater constraints. Investigations to model the costs of serving residential development in this area are continuing. The extent of the Structure Plan area within Otamatea West was restricted by the amount of land required to service the expected demand.

## 2.2 Consultation and Outcomes.....

Since the close of submissions discussions have occurred with most submitters, to clarify and understand each submission. This included:

- 9 November Meeting with Iwi submitters

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<sup>3</sup>Page 20 Beca Reports

- 9 November Phonecall with Mr Hodson
- 9 – 19 November Email updates with Mr Lillington and Mr Underwood.
- 9 – 20 November Emails and a phonecall meeting with NZTA
- 20 November Phonecall and meeting on site at 193 Great North Road with Mr Thompson.

### 3. PART 2 – SECTION 32 EVALUATION....

#### 3.2 Evaluation of the Purpose of PC46

3.2.1 Section 32 requires plan changes to be assessed focussing on the consideration of alternatives, benefit and costs. In considering the alternative methods it is necessary to consider different planning methods to achieve the purpose of the RMA, including retaining the status quo (doing nothing), non regulatory methods and the proposed plan change.

3.2.2 A Section 32 analysis is required to identify that a preferred approach is more efficient and effective than other options in achieving the objectives of the Whanganui District Plan and the purpose of the RMA. The benefits and costs for each option are identified by subtopic below.

#### 3.2.3 Assessment Criteria Options

There are two parts to this Plan Change to provide for residential growth at Otamatea to consider. The first is the consideration of the Otamatea Development Overlay and the second is the rezoning of additional land. The options for each are considered below.

##### Part 1: The Otamatea Development Overlay

Options		Explanation
<b>Option A</b>	Maintain the Status Quo – Retain the Otamatea Development Overlay.	This option would leave the existing District Plan provisions as they currently are, retaining the 1000m <sup>2</sup> minimum lot size in the Residential Zone at Otamatea.
<b>Option B</b>	Removal of the Otamatea Development Overlay from the District Plan.	This option would remove the Otamatea Development Overlay from the planning maps and text, meaning that the minimum lot size at Otamatea would revert to the Residential Zone minimum of 400m <sup>2</sup> which currently applies to all other Residential zoned sites in Whanganui.

Benefits and costs of each option are considered below.

	Benefits	Costs
<b>Option A - Maintain the Status Quo</b>	Least financial cost in the short term as minimal	Current NPS requirements to provide sufficient development capacity are not reflected in the Plan.

<p>Otamatea Development Overlay is retained.</p>	<p>requirement for Plan Change.</p> <p>Minimal short term cost for Council in terms of planning and asset management.</p>	<p>Potential long term costs for infrastructure due to insufficient land to cater for residential development in the area, resulting in infrastructure not being used to capacity within the Residential Zone and additional potentially piecemeal development occurring on the fringes of the zone requiring provision of additional infrastructure.</p> <p>Predicted shortage of suitable land available for residential development at Otamatea out to 2065.</p> <p>Consent and development processes will continue to be more costly for applicants and ratepayers due to a lack of supportive regulation and strategic guidance.</p> <p>Potential risk of legal challenge as the purpose for the overlay (lack of infrastructure knowledge and capacity) is now obsolete. The regulation is no longer necessary.</p>
<p><b>Option B</b> – Remove the Otamatea Development Overlay.</p> <p>The underlying Residential Zone density will apply.</p>	<p>Reduces legal risk for Council as the purpose for the establishment of the overlay no longer applies.</p> <p>Provides for residential development capacity as required under the NPS.</p> <p>Responds to the potential long term demand in Otamatea.</p> <p>Maintains District Plan integrity and effectiveness.</p> <p>The District Plan will be consistent with Council’s Infrastructure Asset Management Plans.</p> <p>More certainly for developers.</p>	<p>Plan Change process costs.</p> <p>Potential need to upgrade infrastructure in the area more quickly than planned.</p>

**Option B** is the recommended option.

The establishment of the Otamatea Development Overlay was only ever intended to be a short term restriction on development, to enable Council to obtain a more detailed understanding of the stormwater and wastewater urban reticulated network capacity and its ability to service additional residential development at Otamatea. Modelling of these networks has been completed. Council now has a good understanding of works, and associated costs, required to upgrade the network to accommodate projected residential demand out to 2065. It is now appropriate to re-examine whether the overlay is still necessary and appropriate as a Plan method to achieve the purpose of the RMA.

The infrastructure modelling work has confirmed that with some minor upgrades, the infrastructure networks can handle a higher density of housing than is provided by

the overlay. The Residential Growth Study signal that of the 455 new infill dwellings that could potentially be demanded at Otamatea by 2065, only 120 dwellings can be accommodated within the existing Residential Zone if the overlay is retained. By removing the overlay, up to 510 dwellings could potentially be accommodated. See Appendix 5 for the memo discussing density options.

This option meets Council's legal requirements to provide for residential growth.

No submissions were received in regard to this proposed change to the District Plan.

## Part 2: Rezone additional land at Otamatea West to Residential.

Options <sup>4</sup>		Explanation
<b>Option 1</b>	Maintain the Status Quo – Consider development proposals on an ad hoc basis.	<p>This option would leave the existing District Plan provisions unchanged, meaning that the majority of the study area remained zoned Rural Lifestyle with a minimum lot size of 5000m<sup>2</sup> and a presumption against connections to the urban reticulated networks for stormwater and wastewater.</p> <p>This option identifies no additional land for residential development. The result is likely to be more ad hoc development in the area with individual subdivisions occurring with no integrated planning for transport or infrastructure systems. This encourages piecemeal asset management that is not sustainable in the longer term.</p>
<b>Option 2</b>	Re-zone the Otamatea West study area to Residential.  (no Structure Plan)	<p>This option would zone all land within the study area to Residential. This would enable some development at a residential density with connections to the urban reticulated system as shaped by individual developments.</p> <p>Of the three proposed options, this one provides the largest total area of land for residential development. However much of it is not developable due to topography, infrastructure constraints and existence of archaeological sites and potential cultural issues.</p>
<b>Option 3</b>	Re-zone most of the Otamatea West study area to Residential, incorporate the Otamatea West Structure Plan <u>and insert a Heritage Alert Overlay</u> .	<p>This option would zone most of the land within the study area to Residential and incorporate the Structure Plan <u>and insert a Heritage Alert Overlay</u>. This would require development to take into account, and provide for <u>quality urban design outcomes, historic heritage values</u>, the wider community values and allow Council to plan for infrastructure requirements and upgrades in a comprehensive manner.</p>

Benefits and costs of each option are considered below.

<sup>4</sup> Refer to Appendix 6 PC46 – Scoping of Options Report, August 2016

Option 1 – Maintain the Status Quo	
Benefits	<p>Least financial cost in the short term as minimal requirement for Plan Change.</p> <p>Minimal short term cost for Council in terms of planning and asset management.</p> <p><u>Minimal costs to developers in relation to protection of archaeological sites or cultural values.</u></p> <p><u>Minimal costs to developers as few requirements to achieve quality urban design outcomes or integrated transport networks.</u></p>
Costs	<p>Current NPS requirements to provide sufficient development capacity are not reflected in the Plan.</p> <p>Potential long term costs for infrastructure due to piecemeal development.</p> <p>Unequal distribution of costs and risk of greater portion of costs covered by ratepayers.</p> <p>Uncertainly for developers as to what would be acceptable to Council.</p> <p>Potential shortage of available suitable land for residential development <u>and potential increased costs for residents.</u></p> <p>Lack of connectivity between subdivisions resulting in more cul de sacs.</p> <p>Loss of amenity <u>and increased safety risks</u> due to excessive use of right of ways to access back sections <u>with continued multiple single access points to the State Highway.</u></p> <p>Consent process will continue to be more costly for applicant and ratepayer due to lack of supportive regulation.</p> <p>Potential for inconsistent decision making in these areas.</p> <p>Applications to develop and subdivide in this area more likely to be declined <u>or ad hoc decisions to approve development, in the absence of an appropriate policy framework.</u></p> <p><u>Potential for damage and modification to archaeological sites due to increased density of development via ad hoc development. This is unlikely to be completely offset by the existing regulatory framework.</u></p>
Option 2 – Rezone the Otamatea West study area to Residential (no Structure Plan)	
Benefits	<p>Minimal short term cost for Council in terms of planning and asset management.</p> <p>This option means the minimum lot size would be 400m<sup>2</sup>, meaning the market could determine where to develop and at what scale.</p> <p>Developers have complete freedom to develop sites as they consider most feasible to achieve their development objectives.</p> <p>Less regulation to be complied with, meaning potentially cheaper compliance costs for developers.</p>
Costs	<p>Plan Change process costs.</p> <p>The potential for oversupply of residentially zoned land, much of which may be unsuitable for residential development. Accurate calculation of the required infrastructure capacity would be difficult to gauge, as provision would need to be made for all residentially zoned land to be serviced. However in reality, only the most feasible land would ever likely be developed. This would likely reduce the total contributions from developers towards the cost of infrastructure servicing for the area and increase the total cost to Council over the long term.</p> <p>Once the most favourable and feasible sites are developed, developers will look at other areas for feasible sites and would only choose to develop difficult sites if they become feasible due to changes in the market or technology.</p>



	<p><b>Change in amenity for the area from a rural outlook to an urban environment over time.</b></p> <p>Lack of connectivity between subdivisions resulting in more cul de sacs <b>and more sites directly accessing the State Highway</b>. Loss of amenity due to excessive use of right of ways to access back sections.</p> <p>Less protection of archaeological and cultural sites and values as only minimal provision in the District Plan.</p> <p><b>Potential for damage and modification to archaeological sites due to increased density of development via ad hoc development. This is unlikely to be completely offset by the existing regulatory framework.</b></p>
<p><b>Option 3 – Re-zone the Otamatea West study area to Residential and incorporate the Otamatea West Structure Plan and Heritage Alert Overlay</b></p>	
Benefits	<p>Minimal short term cost for Council in terms of planning and asset management.</p> <p>Cost of infrastructure can be allocated according to who benefits.</p> <p>Plenty of scope for sensible integrated transport connections.</p> <p>Minimum lot sizes could retain flexibility and provision for larger residential sections and still meet housing demand to 2065, with section sizes similar to <b>the existing Residential Zone in this vicinity.</b></p> <p>A high amenity residential environment can be developed.</p> <p>Minimal creation of cul de sacs and back sections.</p> <p>Supply of residential land is consistent with potential demand identified in the Residential Growth Study 2015 and infrastructure modelling. <b>It provides for efficient and effective infrastructure and use of resources.</b></p> <p><b>Identifies a clear and transparent framework for the Full protection of recorded identified and as yet unidentified archaeological and cultural sites within the Structure Plan area. This provides clarity for developers and for iwi about the process and will overtime raise awareness of the cultural values of the area.</b></p> <p><b>Potential for mana whenua to reconnect with ancestral lands, with provision of public spaces, research and recording of archaeological sites.</b></p>
Costs	<p>Plan Change process costs.</p> <p>Some restriction on land use by the protection of indicative roads from development.</p> <p>Change in amenity for the area from a rural outlook to an urban environment over time.</p> <p>Some potential for interim restrictions on existing development to preserve options to achieve <b>a more integrated transport network connectivity</b> in the longer term. This will likely create some consent costs for a few landowners.</p> <p><b>Creates a programme of physical works to achieve the implementation of the Structure Plan which means developers will contribute to the growth costs for area.</b></p> <p><b>Potential for damage and modification to archaeological sites due to increased density of development. This is unlikely to be completely offset by the introduction of a consent process.</b></p>

**Option Three** is the recommended option.

This option maximises the potential by focusing on land that is feasible to develop and where market demand is signalled.

This option maximises the potential **resource management benefits** **returns for developers and Council** by focusing on land that is **considered to be** feasible for **residential** development and where market demand is signalled

The larger lot size proposed reflects the average existing lot size in this area, which directly reflects what the market in this area is demanding. This lot size minimum will also assist to avoid oversupply of land in the area beyond what is predicted out to 2065. **Mr Reuter and Mr Archer have requested that the 400m<sup>2</sup> apply to this area, to encourage increased diversity of development and density for residential development.**

**It is not accepted that reducing the minimum lot size would facilitate greater diversity and better provide for different residential options. Council analysis of the historic development trends in the Residential Zone at Otamatea, where until 2012 no minimum lot size existed, supports the assumption that it is unlikely that high density development would routinely occur at this edge of the urban area. The average lot size in the Otamatea area (Residential Zone) is just over 900m<sup>2</sup>. Of the 535 existing residential lots, only 5% (28) are less than 400m<sup>2</sup>.**

**This issue was previously explored in 2012 when as part of Phase 2 of the District Plan review, a 400m<sup>2</sup> minimum lot size was introduced for the Residential Zone where none had previously existed. The conclusion then was that a minimum lot size was necessary in the Residential Zone to ensure that infrastructure could be provided at an adequate level of service. By having a minimum lot size, but no maximum, there is ample ability to provide for diversity of housing styles to meet the varied needs within the community.**

**Larger section sizes in this vicinity will support the retention of existing amenity values of the wider area, which include a rural outlook in many locations and a spaciousness and openness resulting from generally larger residential section sizes. Should there be demand for development at a higher density, it would be appropriate that potential adverse effects on the existing amenity values and character, be considered through the resource consent process.**

**This area comprises a number of recorded and as yet undiscovered archaeological sites. A larger minimum section size will provide additional flexibility for development to occur whilst protecting archaeological items.**

The issues raised and addressed in the Otamatea West Structure Plan report, August 2017 are incorporated into this Plan Change in the following manner:

**Hydrological neutrality** – addressed by provision of a connected series of stormwater detention areas that can be developed in line with the predicted patterns of residential development.

**Archaeological vulnerability** – addressed by adopting a precautionary approach as recommended in the Archaeological Assessment for Otamatea West Structure Plan Area, Whanganui report, August 2017 and **identifying applying a Heritage Alert Overlay to the entire areas to be rezoned as Residential within the structure plan area to acknowledge the potential of other as-a-potential archaeological sites being present. A stronger emphasis on archaeological assessments and their findings will be achieved through the proposed policy and rules.**

**Cultural effects** – The Otamatea West Structure Plan report, August 2017 notes that cultural values are associated with the Otamatea area and potential effects

throughout the structure plan area and that Tangata Whenua should be consulted as part of any earthworks consent. Te Kaahui o Rauru and the Whanganui Land Settlement Negotiation Trust have requested that the cultural values as outlined in the Interim Cultural Values Report October 2017, be recognised and protected. PC46 will facilitate this outcome through provision of the Heritage Alert Overlay including policy and rules to establish a clear expectation and transparent pathway for those seeking to undertake development involving land disturbance.

Through this Plan Change other benefits can be accrued to enhance cultural values, such as opportunities to review existing names applied to the area and to collaborate in the naming of new streets or public spaces. Opportunities will also be created for mana whenua to physically reconnect in part with this ancestral land, through the development of public spaces such as walkways, detention pond areas and roadways. Opportunities to have input to the design of such public spaces may further assist achieve a sense of reconnection.

A stronger emphasis on cultural impact assessments and their findings will be achieved through the proposed policy and rules.

**Connectivity** – The Otamatea West Structure Plan (proposed District Plan - Appendix L) provides for roading and shared pathway connectivity between the potential subdivision developments as well as pedestrian/cycling routes.

The New Zealand Transport Agency has expressed concern that the safe and efficient functioning of the State Highway may be compromised, by the provision of four new roads to service the 209 proposed new lots in this area. In response to this, other submitter objections to the location of Road 4, and in recognition of recent subdivisions of rear-sections such as 193 Great North, the road layout has been amended to improve safety by relocating Road 4 to the north and removing Road 3. This will partially address potential conflicts with existing roads in the vicinity, while still achieving a relatively integrated road network.

**Effective and efficient infrastructure** development (no septic tanks) – By re-zoning additional land Residential, the Plan provisions then require sites to be connected to the reticulated system.

The re-zoning of land at Otamatea West and the incorporation of a Structure Plan over the area will provide additional land for high amenity residential development, with the infrastructure costs allocated to those who benefit.

Implementation of the Structure Plan as amended, will provide clear guidance to developers that neither Council nor NZTA will look favourably on alternatives such as rights of way or single site access to the State Highway. PC46 provides a framework to achieve high quality urban design including an integrated transport network that avoids the need for adhoc access design. This will over time improve road safety outcomes.

### 3.2.4 Examination of Changes Proposed by PC46

Section 32 (1)(b) of the RMA requires that Council examine whether the provisions included in PC46 are the most appropriate way to achieve the purpose of the RMA. In this instance the provisions are the policies proposed.

Option B and Option 3 discussed above, are the most appropriate course of action as together they provide for feasible and cost effective residential growth at Otamatea. Option 3 provides guidance for plan users while achieving the objectives of the Plan and purpose of the RMA.

The changes proposed by Options B and 3, as amended following consideration of submissions, would include:

- Insert a new issue, policies and rules to require development to occur in accordance with the key criteria in the Otamatea West Structure Plan report.
- Identify a Heritage Alert Overlay to apply over newly zoned residential land and undeveloped land already zoned residential land within the Structure Plan area.
- Insert new policies and rules to protect historic heritage within the Heritage Alert Overlay at Otamatea, including to restrict subdivision and land disturbance activities.
- Insert a new definition for Land Disturbance in Chapter 2 – Definitions.
- Insert an amended version of Figures 11 and 12 of the Otamatea West Structure Plan report as Appendix L (A) and (B) to the District Plan and make consequential references in the Plan text...and show as a layer on District Plan maps
- Remove the Otamatea Development Overlay from the text and maps of the District Plan.
- Insert the proposed roading layout of the Otamatea West Structure Plan report as amended following consideration of submissions, on the District Plan maps U3 and U8. Identify them as indicative roads.
- Identify the boundary of the Structure Plan area as a layer on District Plan maps U3 and U8.
- Insert and update archaeological sites information on the planning maps and Appendix K of the District Plan.
- Rezone land as indicated in the Otamatea West Structure Plan report.

These changes are informed by the following studies:

- Tirimoana Place Structure Plan Future Residential Development Area, Opus Consultants Ltd (October 2011).
- Otamatea Development and Infrastructure Report, Opus Consultants Ltd (2012).
- Wanganui District Council District Plan Review – Phase 2: Residential – Residential Growth Discussion Paper – Discussion Paper 2D (21 February 2012).
- Wanganui District Council District Plan Review – Phase 2: Residential – Infill Capacity Assessment Report – Discussion Paper 2 C (8 February 2012).
- Residential Growth Study, WDC (2015).
- PC46 – Scoping Report, WDC (2016)
- Archaeological Assessment for Otamatea West Structure Plan Area, Whanganui, Archaeology North Ltd (August 2017)
- Otamatea West Structure Plan, Opus Consultants Ltd (August 2017).
- Otamatea West Structure Plan – Integrated Transport Assessment, Beca Ltd, October 2017

- Interim Cultural Values Report: Otamatea Structure Plan Change, Raukura Waitai and Te Kaahui o Rauru, October 2017.

### 3.3 EVALUATION OF THE RECOMMENDED OPTION

Various Council officers and stakeholders have been involved in research or 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 appropriate.

It is considered that the review of the Otamatea Development Overlay and the incorporation of the Otamatea West Structure Plan and Heritage Alert Overlay are the most efficient and effective means available to Council to achieve its obligations as set out in the RMA.

#### 3.3.1 Appropriateness of Objectives

No new objectives, nor any changes to the existing Plan objectives are proposed as part of this Plan change. PC46 will enable residential development to meet community needs, whilst providing for and having regard to the relationship of Maori to their ancestral lands, protecting historic heritage values, encouraging efficient and effective infrastructure services and facilitating sustainable management of subdivision and development in the Otamatea area. In this regard, PC46 is the most appropriate way to achieve Plan objectives: 4.2.1, 9.2.1 – 9.2.3, 9.2.5 – 9.2.8, 13.2.1 – 13.2.4 and 14.2.1.

#### 3.3.2 Evaluation of Policies

The proposed policies need to be read in conjunction with existing relevant Plan policies as indicated by grey shading in the s42a report Appendix 4.

An evaluation of whether, having regard to their efficiency and effectiveness, the proposed policies are the most appropriate way to achieve the objectives is set out below:

#### **Residential Environment -Proposed Policies to achieve Objective 4.2.1.**

4.3.9 Residential development at Otamatea West ~~shall~~ must ensure good quality urban design outcomes and provide efficient, safe and resilient infrastructure. provision, with Pparticular regard must be given to achieving ~~consistency with~~ the indicative roading layout, three water infrastructure, historic heritage features and landscaping.

4.3.10 Developments ~~which that propose seek to vary deviate~~ from Appendix L (Otamatea West Structure Plan) are encouraged: ~~provided but only if the following key criteria to ensure~~ are achieved in a manner that secures quality urban design outcomes and the provision of efficient, safe and resilient infrastructure. provision are adhered to, by requiring that development:

- The development c~~E~~creates purposeful linkages for both vehicles and for active modes of transport, including pedestrian use that which are safe, pleasant and work with the natural landform;
- The development e~~E~~establishes road linkages to existing residential development adjacent to the Structure Plan area and to adjacent land and achieves good quality road linkages in all four directions as currently proposed to optimise connectivity within the locality.
- The development m~~M~~anages stormwater to ensure hydrological neutrality for each development parcel within the Structure Plan area, thus ensuring neutral environmental effects beyond the wider Structure Plan area.

- d) The development ensures residential development and associated infrastructure are designed to work with the natural landscape as far as possible.
- e) The development avoids lengthy private rights of way where a road access to serve rear sections is appropriate.
- f) The development enhances stormwater management and cycle/pedestrian networks to facilitate the potential for ecological corridors through the Structure Plan area.
- g) The development's transportation impacts (including demand generation) on the existing or proposed intersections with the state highway, and how these may vary from the effects modelled or anticipated in the development of the Structure Plan are taken into account. And to the extent the adverse effects are materially greater than modelled or anticipated these are mitigated by works or design.
- h) The development integrates other infrastructure within the Structure Plan area including the electricity, gas and fibre distribution networks.

## **Subdivision and Infrastructure - Proposed Policies to achieve**

### **Objectives 13.2.1 – 13.2.4**

13.3.35 Require all subdivision and development in the Springvale Indicative Future Development Area (SIDP) and the Otamatea West Structure Plan Area (OWSPA) to proceed generally in accordance with the provisions of the relevant Development Plan or Structure 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 relevant 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 or the Otamatea West Structure Plan area (OWSPA) (Appendix L to other areas. Sufficient existing capacity must be available in the infrastructure catchment to provide for the scale of development proposed.

13.3.39 Reserve areas within the Otamatea West Structure Plan area (Appendix L) shall achieve one or more of the following:

- protect historic heritage or ecological corridors; or
- facilitate stormwater management; or
- provide for active recreational purposes, including cycle/pedestrian networks.

### **Comment**

Whilst the District Plan already establishes a policy framework capable of supporting **good** design outcomes in the urban area, further amplification is necessary and desirable to provide a stronger and clearer framework for the consideration of these matters in the greenfield area of Otamatea West, both through the new Structure Plan and through future resource management decisions within the area.

Within the context of the policies, rules and the Structure Plan itself, the proposed changes ensure that subsequent development will be appropriately controlled to fulfil the purpose and principles of the Resource Management Act and the expectations of Council's strategies.

## Summary of Benefits

### Environmental

- Land is developed at a sustainable density and ecological values of the area are enhanced by the development of a landscaped stormwater detention area.
- Policies provide for a range of development scenarios, while ensuring that development achieves quality urban design outcomes and safe and resilient infrastructure, including specific reference to integrated transport outcomes and implications for the state highway network.
- Discourages residential development from establishing further private rights of way or individual accessways to the State Highway, by considering the implications on the overall implementation of the Structure Plan and quality urban design outcomes.

### Economic

- Facilitates orderly development of the wider area without creating an oversupply of land, and thus a more efficient proportion provision of services which will be more cost effective for developers and Council.
- Stormwater will be comprehensively managed for the benefit of, the Structure Plan area, the wider area of Otamatea and the State Highway network in the vicinity.
- The cost of infrastructure will be spread evenly amongst those who benefit from it, through a development contributions policy to be prepared under the Local Government Act 2002, this is facilitated by the structure planning process. The policy is designed to facilitate development feasible for both developers and the community.
- The provision for stormwater detention areas, indicative road and shared pathway layouts are flexible enough to retain the ability for developers to consider other options as the technology changes over the next fifty years.

### Social/ Cultural

- Additional archaeological sites are recognised recorded and protected both within-on the Planning maps and specifically in the Structure Plan area. Cultural values will be better protected by the rezoning which will make the earthworks provisions apply and therefore the associated policy to consider the cultural values.
- Ad hoc residential development will be discouraged and this should reduce potential for damage or destruction of archaeological sites that can accompany this type of uncoordinated development.
- Currently Otamatea is characterised by cul de sacs off the State Highway. This does not foster much a sense of community as there is little interaction between streets. This Plan Change requires road and shared pathway connectivity between the potential subdivisions which will foster better community cohesiveness. The provision for stormwater detention areas, indicative road and shared pathway layouts are flexible enough to retain the ability for developers to consider other options as the technology changes over the next fifty years.
- Completion of the supporting technical documents relating to cultural values and archaeological sites, will assist to raise awareness in the community and amongst landowners over time.
- Development of public open spaces, shared pathways and roads in accordance with the Structure Plan key criteria will facilitate opportunities for mana whenua to reconnect physically with their ancestral land.

<b>Summary of Costs</b>
<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>• Building density will increase in the area and the amenity will change from rural lifestyle to residential. Stormwater will be channelled and stored in detention areas, <b>making some areas undevelopable for residential purposes.</b></li> </ul>
<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>• Some developers and owners will be restricted due to the location of the indicative roads.</li> <li>• The zone change to Residential will increase the cost of developing the sites through increased requirements to avoid, remedy or mitigate the effects on archaeology or cultural values, <b>relative to the Rural Lifestyle Zone.</b></li> <li>• Additional archaeological sites are <b>recognised recorded</b> and protected both within the maps and specifically in the structure plan area. Cultural values and archaeological sites will be better protected and this will potentially make some areas unsuitable for development.</li> <li>• <b>The 50 year horizon for development will mean Council may have to fund some infrastructure costs for several decades.</b></li> <li>• <b>Additional consent costs associated with the preparation of more comprehensive applications to consider consequences for implementation of the structure plan and protection of historic heritage values.</b></li> </ul>
<p><b>Social/ Cultural</b></p> <ul style="list-style-type: none"> <li>• Some cultural values or archaeological sites will be disturbed and potentially destroyed.</li> <li>• <b>NZTA has expressed concern that the safe and efficient functioning of the State Highway may be compromised, by the provision of new roads to service the 209 proposed new lots in this area</b></li> </ul>
<b>Effectiveness and Efficiency</b>
<p>This Plan Change is the most effective way to provide for residential growth in Otamatea for the next fifty years. Through the Structure Plan being adopted into the District Plan, as well as other associated Council documents, Council can provide a clear, consistent guide of what is expected in this area and what the costs are. <b>In addition greater recognition of the relationship of mana whenue to this ancestral land can be achieved and greater protection achieved for historic heritage values.</b> This provides increased certainty to developers and ratepayers, while keeping the provisions flexible enough to consider alternative solutions.</p>
<b>Appropriateness</b>
<p>It is a requirement of the NPSUDC for the Council to demonstrate sufficient development capacity. This Plan Change achieves this for the Otamatea area, which is an area with high housing demand. Therefore it is appropriate.</p>
<b>Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods</b>
<p>There is already development pressure in this area. If this Plan Change is not acted upon, then the development will continue to occur in a piecemeal fashion without consideration of the wider environmental, social and cultural considerations of the community.</p>



## Cultural Heritage -Proposed Policy to achieve Objectives

### 9.2.1 – 9.2.3, 9.2.5 – 9.2.8 and 14.2.1

9.3.21 *When assessing an application for subdivision or land disturbance activity within the Heritage Alert Overlay, Council must have regard to the following matters to ensure that adverse effects on historic heritage values are avoided in the first instance, but if that is not practicable then remedied or mitigated:*

- *alternate methods and locations available for applicants to carry out the works or activities;*
- *the nature, form and extent of the activity and the likelihood of damage, modification or destruction of the archaeological site;*
- *extent to which individual elements of historic heritage value are affected;*
- *measures taken to protect the historic heritage values including to restore a site to its former state after completion of the work, having regard to customs and values of tangata whenua;*
- *the findings of any cultural impact assessment carried out on behalf of tangata whenua;*
- *the findings of any archaeological assessment carried out by a suitably qualified archaeologist;*
- *any conditions imposed in an authority issued under the Heritage New Zealand Pouhere Taonga Act, 2014;*
- *the provisions of any relevant management plan where appropriate, whether the proposal meets the provisions of the ICOMOS New Zealand Charter for the Conservation of Places of Cultural Heritage Value.*

Notes:

1. *Council will hold a register of cultural impact assessments and archaeological assessments. Where an assessment has been previously received by Council for the same land, then a further report will not be required.*
2. *However where an archaeological assessment has previously been received by Council for the same land, a further report or an update of an existing report may be required because of the naturally changing nature of the landscape particularly due to sand movement regularly covering and uncovering archaeological items or where the nature or scale of the work originally assessed has been altered.*

## Summary of Benefits

### Environmental

- *Comprehensive management of the stormwater network will improve the health of the land.*
- *Opportunities for collaboration of landowners, Council and Iwi in the design and development of public spaces and determining place names, will facilitate a form of physical reconnection with ancestral land and/or incorporation of historic heritage items within such public spaces.*

### Economic

- *The policy provides clear guidance to developers and mana whenua of the expectation that historic heritage values be protected, and that the potential impact of development on cultural values and archaeological items needs to be investigated early.*

### Social/ Cultural

- *Increased confidence in the District Plan as a mechanism to protect historic heritage and to provide clear guidance to developers and the wider community.*
- *Increased recording of and awareness of the cultural values and archaeological items within this area will occur over time within the community.*
- *Additional archaeological sites are recognised recorded and protected both within the maps and specifically in the structure plan area. Cultural values will be better protected by the rezoning which will make the earthworks provisions apply and therefore the associated policy to consider the cultural values.*
- *Ad hoc residential development will be discouraged and this should reduce potential for damage or destruction of archaeological sites that can accompany this type of uncoordinated development.*

<b>Summary of Costs</b>
<p><b>Environmental</b></p> <ul style="list-style-type: none"> <li>Building density will increase in the area and the amenity will change from rural lifestyle to residential. However some areas may be excluded from development or have development potential reduced due to historic heritage values being protected.</li> </ul>
<p><b>Economic</b></p> <ul style="list-style-type: none"> <li>Additional archaeological sites are recognised recorded and protected both within the maps and specifically in the structure plan area. Cultural values and archaeological sites will be better protected and this will potentially make some areas unsuitable for development. This may cause some areas to be uneconomic for development.</li> <li>Some developers and owners will be restricted due to the location of archaeological items.</li> <li>Additional consent costs associated with the preparation of archaeological assessments and/or cultural impact assessment reports.</li> <li>Additional costs associated with obtaining Authority from Heritage New Zealand as a result of a raised awareness of this legal requirement.</li> </ul>
<p><b>Social/ Cultural</b></p> <ul style="list-style-type: none"> <li>Some cultural values or archaeological sites will be disturbed and potentially destroyed.</li> </ul>
<b>Effectiveness and Efficiency</b>
<p>This Plan Change is the most effective way to provide for residential growth in Otamatea for the next fifty years, whilst facilitating recognition of cultural values and protection of archaeological sites. Particularly when existing demand for residential development in this area is taken into account. Continued ad hoc subdivision and development is likely to be an outcome of the 'do nothing' option. Adherence to this policy in managing development and subdivision, is likely to provide more effective or efficient protection of cultural values and historic heritage.</p> <p>Through the Structure Plan being adopted into the District Plan, as well as other associated Council documents, Council can provide a clear, consistent guide of what is expected in this area and what the costs are. In addition greater recognition of the relationship of mana whenue to this ancestral land can be achieved and greater protection achieved for historic heritage values. This provides increased certainty to developers and ratepayers, while keeping the provisions flexible enough to consider alternative solutions.</p>
<b>Appropriateness</b>
<p>It is a requirement of the RMA for the Council to recognise and provide for the relationship of Maori with their ancestral land and to protect historic heritage. This Plan Change enable this to be achieved within the context of the Otamatea West area, which is an area with high housing demand. Therefore it is appropriate.</p>
<b>Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods</b>
<p>There is already development pressure in this area. If this Plan Change is not acted upon, then the development will continue to occur in a piecemeal fashion without consideration of the wider environmental, social and cultural considerations of the community.</p>

### 3.3.3 Evaluation of Method - Rules

An evaluation of whether, having regard to their efficiency and effectiveness, the proposed methods are the most appropriate way to achieve the objectives is set out below:

#### Proposed District Plan Map Changes

- Remove the Otamatea Development Overlay from the text and maps of the District Plan.
- Rezone land as indicated in the Otamatea West Structure Plan report.
- Identify a Heritage Alert Overlay over newly zoned residential land and areas currently undeveloped residential zoned land within the Structure Plan area.
- Insert the proposed roading layout of the Otamatea West Structure Plan report as amended following consideration of submissions, on the District Plan maps U3 and U8. Identify them as indicative roads.
- Identify the boundary of the Structure Plan area as a layer on District Plan maps U3 and U8.
- Insert and update archaeological sites information on the planning maps and Appendix K of the District Plan.
- Insert an amended version of Figures 11 and 12 of the Otamatea West Structure Plan report as Appendix L (A) and (B) to the District Plan and make consequential references in the Plan text.. and show as a layer on District Plan maps

#### Proposed Rule – Activity Status

Rural Lifestyle Zone...3.6.2 Restricted Discretionary Activities.

The following are restricted discretionary activities:...

- e. Structures located on or within 5 metres of the indicative roads identified in Appendix L (Otamatea West Structure Plan).
- Council restricts its discretion to the following matters:
- i. Consequences for implementation of the Otamatea West Structure Plan.

Residential Zone...4.4.3 Restricted Discretionary Activities.

The following are restricted discretionary activities in the Residential zone:

a. Subdivision\* provided that:

- i. Minimum lot size is 400m<sup>2</sup> or in the case of subdivision in the Otamatea Development Overlay 1000m<sup>2</sup> except that within the Otamatea West Structure Plan (pink shaded area) the minimum lot size is 800m<sup>2</sup>.
- ii

Note: Refer to Subdivision and Infrastructure provisions for subdivision standards and requirements.

- f. Structures located on or within 5 metres of the indicative roads identified in Appendix L (Otamatea West Structure Plan). Council restricts its discretion to the following matters:

- Consequences Implications for implementation of Appendix L (Otamatea West Structure Plan)

#### 9.10 HERITAGE ALERT OVERLAY

##### 9.10.1 Permitted Activities

The following are permitted activities in the Heritage Alert Overlay:

- 9.10.1.1 Any activity that includes land disturbance where an Archaeological Authority for that activity has been obtained under the Heritage New Zealand Pouhere Taonga Act, 2014; or where a suitably qualified archaeologist has confirmed such an Authority is not required.

Note:

1. This Overlay is an area identified as reasonably likely to contain recorded and undiscovered archaeological items.

2. Recorded archaeological sites are identified on the Planning Maps. Aerial photo maps are available identifying individual sites and any associated buffer areas.

### 9.10.2 Non-Complying Activities

The following are non-complying activities in the Heritage Alert Overlay:

- 9.10.2.1 Any activity that includes land disturbance, not provided for as a permitted activity by Rule 9.10.1.1.

#### Subdivision and Infrastructure - 13.4.2 Restricted Discretionary Activities.

The following are restricted discretionary activities:

- a. Subdivision unless otherwise stated.

Council restricts its discretion to the following matters:

- i. The ability of a proposal to meet the relevant subdivision and infrastructure performance standards, and rules.
- ii. The ability of the proposal to meet the relevant general urban design criteria, subdivision general and infrastructure assessment and performance criteria.
- iii. Consequences for the implementation of Appendix L (Otamatea West Structure Plan).
- iv. Whether potential land disturbance resulting from any proposed subdivision, within the Heritage Alert Overlay will affect historic heritage values or sites, including consideration of the:
  - a. Location and siting of building platforms and whether land disturbance exclusion areas should apply;
  - b. Effects of land disturbance associated with development of any allotments.
  - c. Extent to which individual elements of historic heritage value are affected; and
  - d. Any measures taken to protect the historic heritage values.

Note: Applications subject to this rule (except on land within the Heritage Alert Overlay) shall be considered without service, public notification or written approvals from affected persons.

## Proposed Rule – Performance Standards

### Rural Lifestyle Zone 3.7.1 Amenity.

...e. Structures shall not be located on or within 5 metres of the indicative roads identified in Appendix L (Otamatea West Structure Plan).

### Residential Zone...4.5.4 Structures.

All structures shall comply with the following:...

h. New structures shall not be located on or within 5 metres of the indicative roads identified in Appendix L (Otamatea West Structure Plan).

### 4.5.5 Amenity.

a. Minimum net site area is 400m<sup>2</sup> per dwelling, ~~except within the Otamatea Development Overlay which is a minimum of 1000m<sup>2</sup> net site area per dwelling.~~ except that within the Otamatea West Structure Plan (Appendix L - pink shaded area) the minimum net site area per dwelling is 800m<sup>2</sup>.

## Comment

Whilst the District Plan already establishes a policy framework capable of supporting design outcomes in the urban area, further amplification is necessary and desirable to provide a stronger and clearer framework for the consideration of these matters in the greenfield area of Otamatea West, both through the new Structure Plan and through future resource management decisions within the area.

Within the context of the new issue, objectives, policies, rules and the Structure Plan itself, the proposed changes ensure that subsequent development will be appropriately controlled to fulfil the purpose and principles of the Resource Management Act and the expectations of Council's strategies.

The changes to the District Plan maps support this by identifying **recorded** archaeological sites **known about**, the removal of the Otamatea Development Overlay and identifying the entire area affected by the Structure Plan.

### **Heritage Alert Overlay(HAO)**

A Heritage Alert Overlay (HAO) will provide clear guidance on the processes that developers will need to adhere to, to enable Council to address section 6 RMA matters. In combination with the new policies and changes to activity status for land disturbance and considerations for subdivision, this will ensure that historic heritage including cultural values and archaeological sites are considered appropriately within the context of planning for and assessing the effects of subdivision and development to implement the Otamatea West Structure Plan. This will actively enhance the protection of archaeological sites.

The HAO excludes sites within the Structure Plan area that are already zoned Residential and developed to a residential density with little future development potential. These sites are less likely to comprise undisturbed land, that may contain archaeological items. Practicalities of enforcement were also a consideration in excluding such sites.

Sites included in the HAO comprise generally less developed land potentially suited for residential development. Much of the area has been generally used for low productive rural activities in recent times with potentially low levels of land disturbance.

Whilst the Interim Cultural Values (ICV) report does not specify any sites of particular cultural significance or value within the Structure Plan area, it is accepted that the land is ancestral and known by tangata whenua to be wāhi tūpuna (ancestral places) and it is believed there are therefore likely to be wāhi tapu (sacred places) areas. This is considered sufficient to signal at this strategic Plan change stage that significant cultural values are may be present and request protection.

The ICV report would not comprise sufficient detail to preclude development on any individual site at a consent application stage. Significantly more detail about the extent of any particular adverse effects on any specific site or area of cultural value, will be required, if further restriction on the subdivision and/or development of land within the HAO is to be justified as necessary and reasonable in RMA terms.

It is acknowledged that this area is within the general vicinity of the burial site at 183 Rapanui Rd that was partially disturbed in 2008/09. However that site is some 2km, as the crow flies, from this Structure Plan area and not directly affected in any significant or identifiable way by activities at Otamatea West.

The archaeological assessment report and its author confirm that this area has been occupied periodically rather than permanently by pre- European Maori, and that the area is likely to comprise other archaeological items which are relatively common around Whanganui's urban area and periphery. Such items need not preclude residential development. No Pā or Urupa have been identified in this area. An Authority from Heritage New Zealand is required and the Accidental Discovery Protocol will continue to apply. The HAO will provide opportunities to consider whether there would be adverse

effects on historic heritage values and if so those values can be protected in the first instance and if that is not practical how the effects can be remedied or mitigated.

#### **Activity Status - HAO**

The status of subdivision will be unchanged but a stronger emphasis will be placed on assessment of potential adverse effects on archaeological items and cultural values. The exclusion of subdivision from public notification, service and written approval of affected parties requirement, will not apply to subdivision within the HAO.

A new definition of Land Disturbance has been included alongside the existing definition of Earthworks, as this enables appropriate activities to be included. Significant amendments to the Earthworks definition which applies throughout the District would likely be beyond the Scope of this Plan change. Earthworks is a subgroup of Land Disturbance.

Land Disturbance proposed without an Authority from Heritage NZ or without confirmation that such an Authority is not required will be deemed a non-complying activity and Policy 9.3.1 will guide that assessment. The permitted activity status is intended to prevent repetition of the Heritage NZ considerations where an Authority has been obtained. It is also intended to avoid catching those few activities for which an archaeologist will confirm that no effects on any archaeological items are likely. The Accidental Discovery Protocol would continue to apply as would the Heritage NZ legislation.

#### **Summary of Benefits**

##### **Environmental**

- Land is developed at a sustainable density and ecological values of the area are enhanced by the development of a landscaped stormwater detention area.
- Plenty of scope for sensible integrated transport connections.
- Minimum lot sizes will still retain flexibility and provision for larger residential sections and still meet housing demand to 2065, with section sizes similar to the existing Residential Zone in this vicinity.
- A high amenity residential environment can be developed. Minimal creation of cul de sacs and back sections.
- Subdivision and land disturbance activities will achieve appropriate outcomes in terms of protection of historic heritage, and provision of integrated transport linkages, public space and development at a density that retains the existing residential amenity values of openness and spaciousness.

##### **Economic**

- Facilitates orderly development of the wider area without creating an oversupply of land, and thus a more efficient proportion of services which will be more cost effective for developers and Council.
- The cost of infrastructure will be spread evenly amongst those who benefit from it, through a development contributions policy to be prepared under the Local Government Act 2002, this is facilitated by the structure planning process. The policy is designed to facilitate development feasible for both developers and the community.
- The provision for stormwater detention areas, indicative road and shared pathway layouts are flexible enough to retain the ability for developers to consider other options as the technology changes over the next fifty years.
- The benefits of establishing a clear expectation around the protection of historic heritage values will enable developers to consider the implications and costs at the earliest point in the development cycle.

### Social/Cultural

- Additional archaeological sites are recognised and protected both within the maps and specifically in the structure plan area. Cultural values will be better protected by the rezoning which will make the earthworks provisions apply and therefore the associated policy to consider the cultural values.
- Currently Otamatea is characterised by cul de sacs off the State Highway. This does not foster much sense of community as there is little interaction between streets. This Plan Change requires road and shared pathway connectivity between the potential subdivisions which will foster better community cohesiveness.
- The process will encourage early engagement and meaningful collaboration with mana whenua and archaeologists to achieve sustainable management outcomes.
- Potential for mana whenua to reconnect with ancestral lands, with provision of public spaces, research and recording of archaeological sites.

### Summary of costs

#### Environmental

- Building density will increase in the area and the amenity will change from rural lifestyle to residential. Stormwater will be channelled and stored in detention areas.

#### Economic

- Some developers and owners will be restricted due to the location of the indicative roads and archaeological items.
- Some potential for interim restrictions on existing development to preserve options to achieve a more integrated transport network connectivity in the longer term. This will likely create some consent costs for a few landowners.
- The zone change to Residential will increase the cost of developing the sites through increased requirements to avoid, remedy or mitigate the effects on archaeology or cultural values.
- Additional consent costs associated with the preparation of more comprehensive applications to consider consequences for implementation of the structure plan and protection of historic heritage values.

#### Social/Cultural

- Some cultural values or archaeological sites will be disturbed and potentially destroyed.
- Potential for damage and modification to archaeological sites due to increased density of development. This is unlikely to be completely offset by the introduction of a consent process.

### Effectiveness and Efficiency

This Plan Change is the most effective way to provide for residential growth in Otamatea for the next fifty years. Through the Structure Plan being adopted into the District Plan, as well as other associated Council documents, Council can provide a clear, consistent guide of what is expected in this area and what the costs are. This provides increased certainty to developers and ratepayers, while keeping the provisions flexible enough to consider alternative solutions.

It considers the effect of subdivision and development on areas wider than those affected by the re-zone, and shows this on the Planning maps.

The Structure Plan is an efficient way to show the expectations of the District Plan provisions for this area, while providing guidance on the potential issues.

### Appropriateness

It is a requirement of the NPSUDC for the Council to demonstrate sufficient development capacity. This Plan Change achieves this for the Otamatea area, which is an area with high housing demand. Therefore it is appropriate.

**Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods**

There is already development pressure in this area. If this Plan Change is not acted upon, then the development will continue to occur in a piecemeal fashion without consideration of the wider environmental, social and cultural considerations of the community.

The feasibility of development in this area will also be at risk as without a clear plan to provide for development (and its costs), developers will be subject to developer agreements which can vary and threaten the viability of a development. Council may also end up being subject to unanticipated infrastructure costs and the demand could move the housing supply somewhere unplanned for.

## 4. Conclusion

This re-evaluation has been undertaken in accordance with section 32AA of the Act. Following careful consideration of matters raised by submission, it identifies the necessity, benefits and costs arising from this Plan change to provide for residential growth at Otamatea. The appropriateness of the current and proposed policies and methods, having regard to their effectiveness and efficiency, have also been reviewed relative to other means in achieving the purpose of the Act.

Te Kaahui o Rauru and the Whanganui Land Settlement Negotiation Trust have requested that the cultural values as outlined in the Interim Cultural Values Report October 2017, be recognised and protected. PC46 will facilitate this outcome through provision of the Heritage Alert Overlay including policy and rules to establish a clear expectation and transparent pathway for those seeking to undertake development involving land disturbance.

It is not accepted that reducing the minimum lot size would facilitate greater diversity and better provide for different residential options. Council analysis of the historic development trends in the Residential Zone at Otamatea, where until 2012 no minimum lot size existed, supports the assumption that it is unlikely that high density development would routinely occur at this edge of the urban area. The average lot size in the Otamatea area (Residential Zone) is just over 900m<sup>2</sup>. Of the 535 existing residential lots, only 5% (28) are less than 400m<sup>2</sup>.

The New Zealand Transport Agency has expressed concern that the safe and efficient functioning of the State Highway may be compromised, by the provision of four new roads to service the 209 proposed new lots in this area. As a response to this concern, other submitters objections to the location of Road 4 and recognition of recent subdivisions of rear-sections such as 193 Great North, the road layout has been amended to improve safety by relocating Road 4 to the north and removing Road 3. This will partially address potential conflicts with existing roads in the vicinity, while still achieving a relatively integrated road network.

Various Council officers and the community have been involved in undertaking 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 and additional provisions are the most efficient and effective means available to Council to provide for residential development capacity while preserving and enhancing amenity values in Otamatea.

PC46 will enable residential development to meet community needs, whilst providing for and having regard to the relationship of Maori to their ancestral lands, protecting historic heritage values, encouraging efficient and effective infrastructure services and facilitating sustainable management of subdivision and development in the Otamatea area.

# Whanganui District Council Plan Change 46 – Scoping Report



**From:** Rachael Pull, Senior Policy Planner

**Date:** August 2016

**Subject:** Otamatea West – Plan Change Options

### Executive Summary

This report summarises the need to plan for future development in the Whanganui urban area. The evidence suggests that Otamatea West is an area that Council should consider undertaking planning work to prepare for development as opposed to letting the market develop the area on an ad hoc basis.

The preferred option from a planning perspective is to re-zone the feasible development land at Otamatea West to a residential-type zoning and combine this with a development plan to facilitate staged development and infrastructure provision.

### 1. THE WIDER RESIDENTIAL DEVELOPMENT ISSUE

Recently the government released a proposed National Policy Statement on Urban Development Capacity. It indicates that Whanganui, as a main urban area not subject to high growth, must still provide for sufficient development capacity.

In this context, 'development capacity' means the capacity of land for urban development to meet demand after taking into account the zoning, objectives, policies, rules and overlays that apply to the land and the provision of adequate infrastructure.

Historical data suggests an average increase of 67-75 dwellings per year in Whanganui. Council research has determined it is reasonable and prudent to assume that this demand for residential growth will remain into the future. Current forecasts suggest a population increase of 3.89% by 2043. With the current trend of less people per dwelling and a population increase expected in the long term there is residential development pressure. It is Council's responsibility to provide guidance on where residential development should occur and to prevent ad hoc development. The key location considerations and a scenario for distribution of future housing demand were established in a desktop study in 2015. This scenario was then modelled to understand the implications for the stormwater and wastewater systems.

It is anticipated that there will be demand for 3000 new dwellings within the Whanganui District between 2016-2065. Analysis of supply of land indicates that although there are potentially 2333 new dwellings sites available, there is a significant mismatch between land supply 'location' and potential land demand

'location'. The majority of the supply locational shortfall is within the Residential Zone including the Otamatea area.

### 1.1. Otamatea Projected Growth

For the purpose of the Residential Growth Study (RGS) 2015, Otamatea is defined as the land from Otamatea Reserve to the intersection of State Highway 3 and Rapanui Road. It is focused around State Highway 3 (Great North Road) with a series of cul de sacs providing access from the Highway.

The land either side of the developed Otamatea area is called Otamatea East and West, in relation to its location to the state highway network. Over the past few years pressure has been growing including ad hoc subdivision consent applications to develop beyond the existing Residential Zone at Otamatea West.

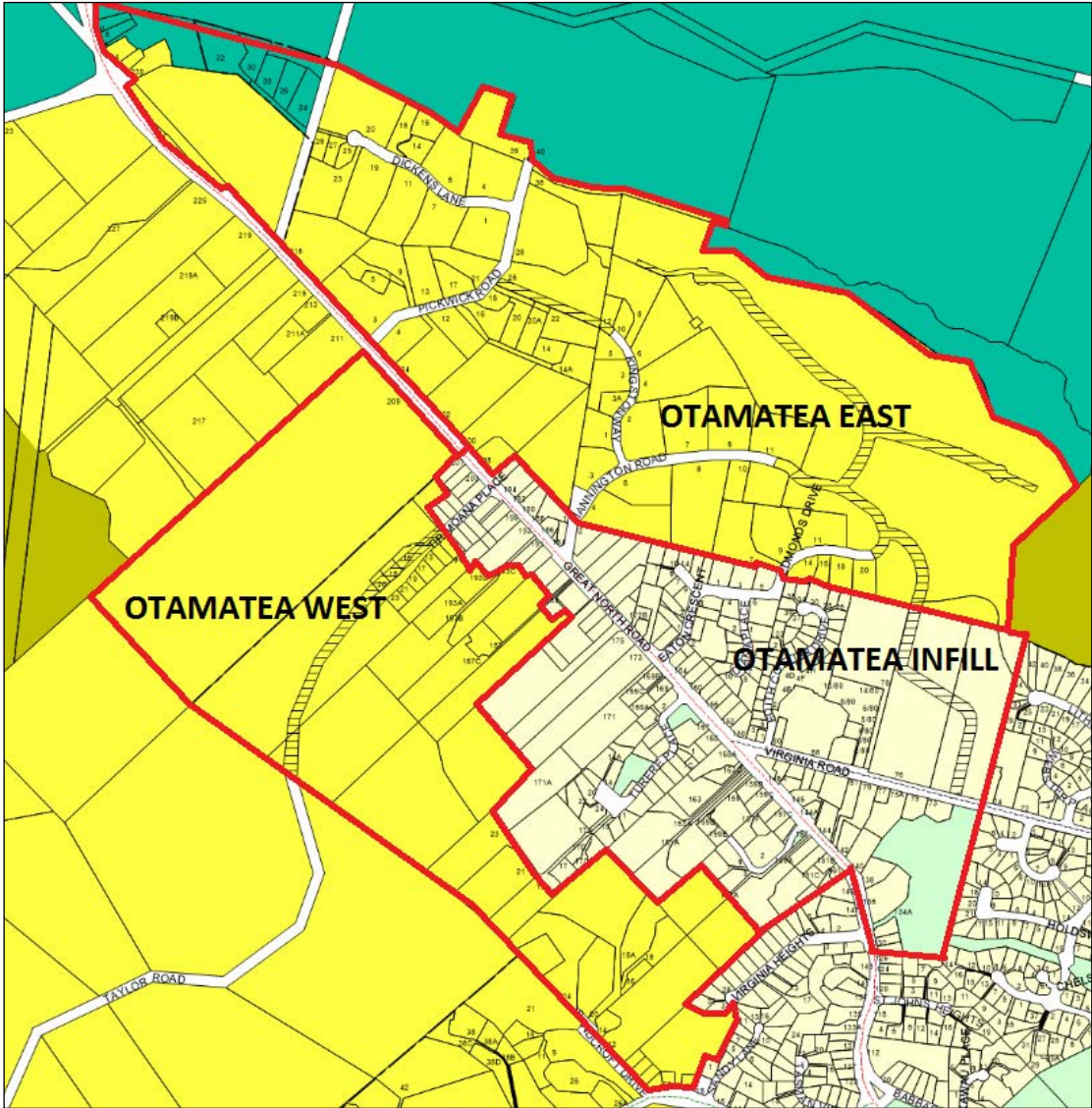


Figure 1: District Plan map showing the areas of Otamatea as defined for the RGS and the wastewater modelling.

The RGS 2015 identified that during the period 2016-2065 a further 455 dwellings (an 85% increase) could be accommodated as infill within the existing Residential Zone at Otamatea (provided the 1000m<sup>2</sup> minimum lot size constraint, the 'Otamatea

Overlay' is removed) and yet there would still be a shortfall of 335 sites within the Residential Zone, even if the land was developed to capacity.

Conversely, within the existing Rural Lifestyle Zone over the next 50 years there could potentially be demand for 195 dwellings, whereas supply is estimated at 447 dwelling sites.

This means that re-zoning some of the Rural Lifestyle land in Otamatea to Residential to provide for a higher density of development would not have any adverse effect on supply of the land for Lifestyle development and provide for the additional Residential demand in Otamatea.

**1.2. The Operative District Plan – Relevant Features**

The Whanganui District Plan is currently being reviewed. The subject land is zoned a mixture of Residential, Rural Lifestyle and Otamatea Development Overlay. There are no site specific hazards identified on the planning maps.

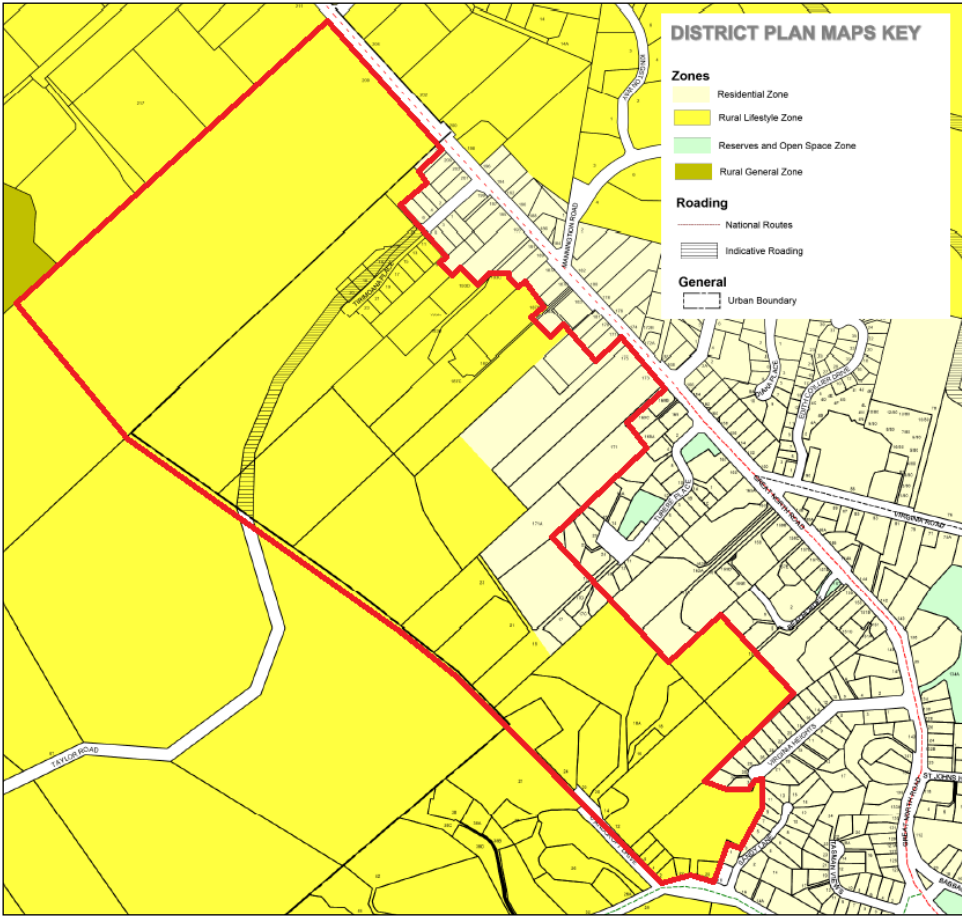
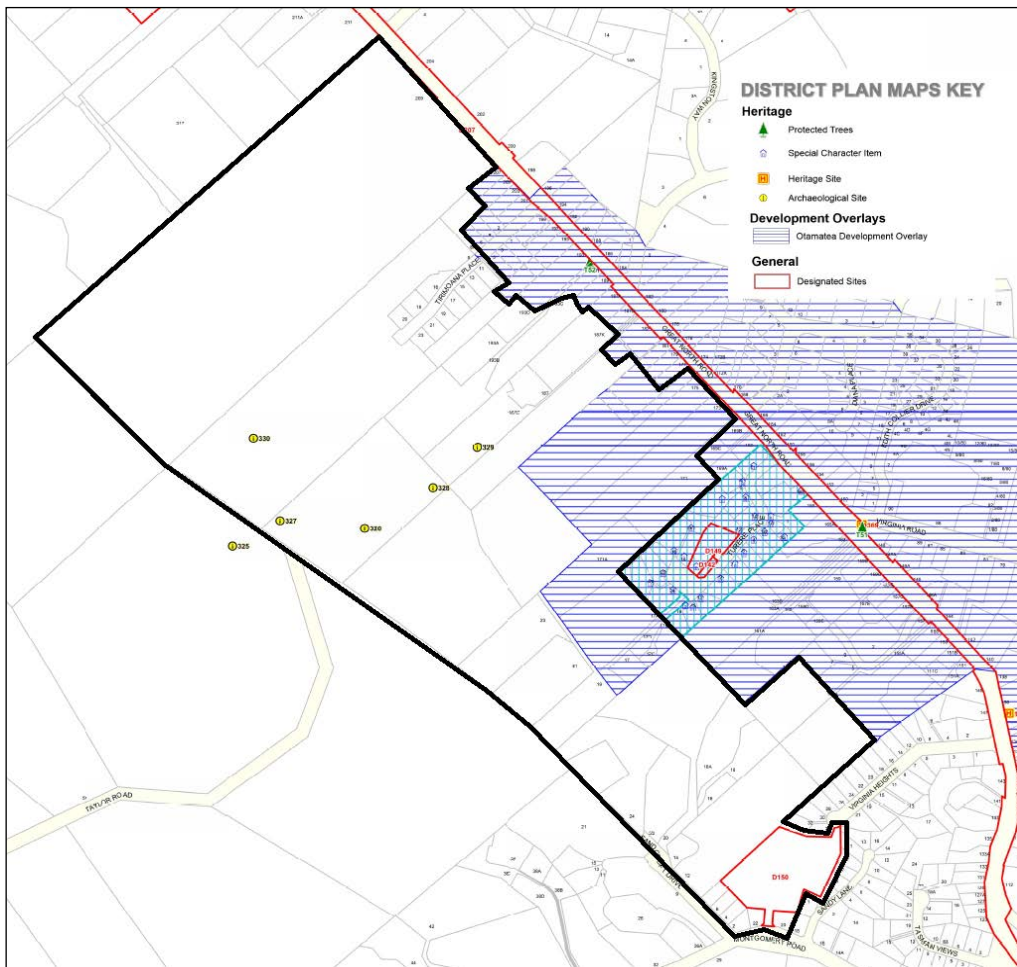


Figure 2 (Above): Map A of the District Plan with the preliminary Otamatea West area outlined in Red.

Figure 3 (Below): Map B of the District Plan with the preliminary Otamatea West area outlined in Black.



- i. The Otamatea Development Overlay was inserted into the District Plan as part of Plan Change 26 in 2014. The overlay addressed a *“lack of quantifiable information regarding the performance and capacity of the reticulated services network... This Committee agrees that the modelling exercise will allow more specific and better informed management of subdivision including minimum allotment sizes. This will result in a re-examination of the appropriateness of the subdivision framework, and where necessary, result deemed in the future changes to the District Plan.”*

This modelling has now been completed and with some upgrades to the wastewater system. The overlay is no longer required at a 1000m<sup>2</sup> minimum density. A Plan change is required to reflect this.

- ii. Another issue is the indicative road from the subject area. The purpose of the indicative road is to give a general sense of how the road might be formed and promote linkages. The indicative road currently in the District Plan crosses a slope over 20 degrees, a significant overland flow path and archaeological sites. This could be removed as part of developing a cohesive design for the area, which would also retain the promotion of road linkages.
- iii. There are several archaeological sites shown on the Planning Maps, although the locations are indicative only. Any development of this area will necessarily have to be alert for potential archaeological sites as well as consult with local hapu and

Heritage New Zealand as to how to treat development around known and potential sites.

- iv. While not shown on the Planning Maps, part of the subject area contains topography with a slope over 20 degrees. This will subject some development to additional costs of more onerous engineering standards and harder to achieve compliance with the height recession plane. This will reduce the potential development feasibility based on current market returns.
- v. The Urban Boundary runs through this area. This is the indicative line around the urban area used in bylaws to separate urban and rural activities. Ideally urban expansion should be contained within this area.
- vi. The subject area shows a designation identified as D150. The purpose of this designation is a detention area for stormwater and is managed by Council. The detention area and designation may need to be expanded as a result of re-zoning Otamatea West.
- vii. There is potentially a lack of recreation reserve land in this area. While Council has no specific policy on how close reserves should be to residential developments, it is generally understood in Council's documents that as new residential areas are developed, an assessment of the availability of suitable reserve land will be required.

### **1.3. Conclusion**

After reviewing the existing zoning and future demand, it is concluded that it would be prudent to zone additional land at Otamatea for residential development. This should be combined with a development/structure plan to stage infrastructure works in a cost effective manner for Council and developers, and provide performance standards that are specific to that area as required (e.g. a potentially larger lot size or alternative infrastructure solutions).

## **2. GREENFIELD DEVELOPMENT AREAS**

### **2.1. Otamatea East**

Detailed modelling of stormwater patterns and consideration of the significant natural constraints to management of stormwater was undertaken. It was concluded that the existence of extensive closed stormwater catchments across the eastern side of Otamatea makes this area unlikely to be feasible for a higher density of residential development. Retention of the Rural Lifestyle zoning (5000m<sup>2</sup> minimum lot size serviced onsite) is appropriate.

Infrastructure constraints have contributed to a fundamental decision not to explore further residential zoning in this eastern area of Otamatea.

### **2.2. Otamatea West**

The stormwater constraints do not exist to the same level in Otamatea West. The cost of servicing and providing suitable building platforms is significantly lower. Otamatea West will be the focus for future provision of residentially zoned land to meet the projected shortfall in demand of 335 dwelling sites required by 2065. Consideration of how best to integrate adjoining residentially zoned land and a review of the necessity for retention of the Otamatea Overlay should also occur at the same time, to ensure that the best design outcomes are achieved.

There are currently 18 households in the proposed Otamatea West area<sup>5</sup> which is bounded by the existing Residential Zone and the Urban Boundary as defined on the District Planning Maps. The largest blocks are held by five property owners.

Not all this land identified in Figure 4, is feasible for residential use, some areas have been included in the study area as they may be at least partially required as stormwater detention areas, necessary to service any development in this area.

### **2.3. Designation of Stormwater Detention Area**

No matter how broad the land area or extent of the Otamatea West rezoning to Residential, it will be necessary to identify and safeguard an area to the south where the stormwater naturally drains to and is detained. The extent of the area to be designated may vary depending on the extent of the area chosen for rezoning to Residential.

The advantages of a common detention area to service the wider development area has benefits to each landowner, as each site will not be required to detain its stormwater onsite. It provides more certainty and surety to Council that the issues will be appropriately and comprehensively addressed, rather than in an ad-hoc site by site manner as largely occurs at present. Other advantages include:

- The stormwater detention would be designated which would enable equitable distribution of costs.
- Council will be responsible for timing and construction of detention area, but would retain the option to require developers to complete work to a Council standard for the major portion of the detention area.
- Facilitates orderly development of the wider area in stages, and thus a more efficient provision of services which will be more cost effective for developers and Council.

It is recommended that a designation for stormwater purposes including secondary flow paths be included as an integral and essential component of any Plan change that proposes to expand the Residential Zone or similar zone at Otamatea West.

## **3. OPTIONS FOR LAND AREA - IDENTIFICATION AND EVALUATION**

Several planning options exist to facilitate development within the Otamatea West area. The main options are:

- Re-zone the entire Otamatea West area to Residential.
- Re-zone only feasible development sites in Otamatea West Residential.
- Status Quo – consider development proposals on an ad hoc basis.

The benefits and costs for each option are discussed below.

### **3.1. Option 1: Re-zone Entire Otamatea West Area**

This option would zone all land to the west of Great North Road between Sandcroft Drive northwards to Pickwick Road (including part of 209 Great North Road) as a Residential Zone as indicated in Figure 4 This would enable development at a

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<sup>5</sup> StatsMaps – 2013 Census Map

residential density with connections to the urban reticulated system. The approximate area of Otamatea West is 66 hectares.



*Figure 4: The preliminary area identified as Otamatea West outlined in black. Any planned development on this area would also include land zoned Residential between Otamatea West and the State Highway.*

### **Option 1 Evaluation**

Of the three proposed options, this one provides the largest total area of land for residential development. However much of it is not developable due to topography, infrastructure constraints and existence of archaeological sites.

The advantages of this option include:

- The largest number of potential transport connections.
- This option provides for the largest amount of land, meaning the development plan could provide for large lot sizes similar to the surrounding area while still achieving the required number of residential lots.
- Rezoning of a larger area provides scope for additional provision of stormwater detention and/ or a recreation reserves to benefit the wider residential area.

This disadvantages to this option include:

- Servicing difficulties exist for areas to the south, which would be costly to remedy.
- The sites to the south are also low lying and damp, and considered less desirable for residential purposes.



- The potential for oversupply of residentially zoned land, much of which may be unsuitable for residential development. Accurate calculation of the required infrastructure capacity would be difficult to gauge, as provision would need to be made for all residentially zoned land to be serviced. However in reality, only the most feasible land would ever likely be developed. This would likely reduce contributions from developers towards the cost of service provision for the area and increase the total cost to Council over the long term.
- Once the most favourable and feasible sites are developed, developers will look at other areas for feasible sites and would only choose to develop difficult sites if they become feasible due to changes in the market or technology. .

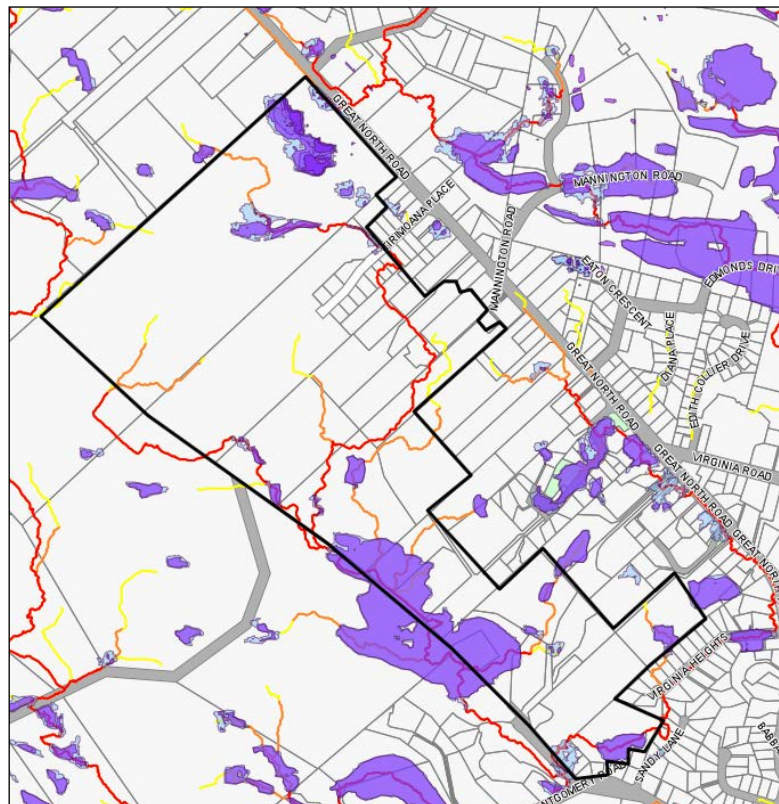


Figure 5: The subject area highlighted in black showing the extent of the overland flow paths and water detention areas already existing.

### Recommendation

This is a least preferred option from a planning perspective as much of the land identified is not easy or attractive for residential development and living. The area to the south and west would likely remain undeveloped as there will likely always be more attractive and cost effective development sites elsewhere in Whanganui.

To zone land physically unsuitable for residential density may lead to over design of services on the basis that maximum density permitted will be over time, achieved. This is unlikely to be cost efficient for Council or developers. There would be servicing constraints and a residential zoning would put increased pressure on Council to resolve because the zoning 'may create unrealistic landowner expectation. A Residential Zone applied to areas not easily serviced using standard infrastructure methods and to less attractive areas from a market perspective will likely create increased costs to Council, unrealistic landowner expectations and may lead to pressure for Council to resolve issues or reduce development standards.

### 3.2. Option 2: Rezone Most Feasible Residential Areas of Otamatea West

This option would focus on re-zoning land that is feasible for residential development and leave the remaining land as Rural Lifestyle Zone. This would result in a mixed density urban area with connections to the reticulated system. An area would be designated for stormwater detention and include overland flow paths/walkways similar to Figure 7 below. This area would run from 209 Great North Road and end next to (not including) 17A Turere Place.



Figure 6: The potentially feasible areas identified at Otamatea West outlined in black. Some of this area is already zoned Residential. There are also pieces of land outside the identified area that may be required for stormwater detention.



*Figure 7: An extract from the Tirimoana Place Structure Plan (2011) that shows a possible mixed density layout for the area.*

## **Option 2 Evaluation**

This option provides for residential development as well as increased access to landlocked parcels of rural lifestyle land that could be developed to capacity. By providing integrated solutions to infrastructure issues like access and stormwater, the overall development can achieve a higher amenity and less cost per site.

The advantages of this option include:

- Plenty of scope for sensible integrated transport connections.
- Minimum lot sizes could retain flexibility and provision for larger section residential section and still meet housing demand to 2065, with section sizes similar to existing adjoining Residential Zone.
- Provides for mixed density and a range of living options.
- Provides scope and options for recreation reserve/stormwater detention.
- Reduces the amount of land that is unsuitable for development by providing for larger lot sizes.
- Provides for a more realistic total number of dwellings likely to be developed and require urban reticulated services as it focuses primarily on zoning feasible land for residential development.
- Facilitates orderly development of the wider area in stages, and thus a more efficient proportion of services which will be more cost effective for developers and Council.
- The stormwater detention would be designated which would enable equitable distribution of costs.
- Council will be responsible for timing and construction of detention area, but would retain the option to require developers to complete work to a Council standard for the major portion of the detention area.

This disadvantages to this option include:

- Some developers will be restricted on the timing of their development as they would not be able to develop feasibly until an adjoining site's infrastructure is completed.
- The only option to create the detention pond and recreation area/overland flow path would be by designation (as opposed to easements or developer agreements) as these lots would not be developed as their zoning would not be changed.

## **Recommendation**

This option maximises the potential returns for developers and Council by focusing on land that is feasible to develop (and therefore likely to be attractive to the market). This maximises the lots that are likely to be developed, which reduces the cost per unit of development, also improves attractiveness and will potentially reduce the return period on infrastructure costs.

The land located at the rear of Turere Place and south to Montgomery Road is excluded from this assessment due to its lack of market demand for low lying, steep damp sites and the infrastructure costs required to service these areas.

Within this option, there is the potential to exclude or include 209 Great North Road. This is the last large (28ha) undeveloped lot in the area and bounded by 2ha lots to the north and 1000m<sup>2</sup> lots to the south. It is reasonably flat and easy to develop land that could be used for either rural lifestyle or residential development. However if it is part of this re-zoning option, then it could be connected to Tirimoana Place and there could be efficiencies in serving this area jointly as opposed to a standalone development. 209 Great North Road is just outside the urban boundary, however the boundary's legislative weight is used to define urban/rural activities for by-laws and therefore it would be reasonable to change this should the area be re-zoned Residential.

### 3.3. Option 3: Status Quo

This option would leave the existing District Plan provisions as they currently are, meaning that the majority of the area remained zoned Rural Lifestyle with a minimum lot size of 5000m<sup>2</sup> and no guarantee of connections to the wastewater network. This option relies on infill within the existing Residential Zone.



Figure 9: Aerial photography of the subject site with lodged subdivision applications highlighted in blue.

#### Option 3 Evaluation:

This option identifies no additional land for residential development. The result is likely to be more ad hoc development in the area with individual subdivisions occurring with no integrated planning for transport or infrastructure systems. This encourages piecemeal asset management that is not sustainable in the longer term.

The advantages to this option (over the other options) include:

- Minimal short term cost for Council in terms of planning and asset management.

This disadvantages to this option include:

- Potential long term costs for infrastructure due to piecemeal development.

- Unequal distribution of costs and risk of greater portion of costs covered by ratepayers.
  - Uncertainty for developers as to what would be acceptable to Council.
  - Potential shortage of available suitable land for residential development.
  - Lack of connectivity between subdivisions resulting in more cul de sacs.
  - Loss of amenity due to excessive use of right of ways to access back sections.
  - Consent process will continue to be more costly for applicant and ratepayer due to lack of supportive regulation.
  - Potential for inconsistent decision making in these areas.
- Applications to develop and subdivide in this area more likely to be declined.

### **Recommendation**

This option leaves the major decisions for amenity, connectivity and density in the hands of the market and the individual land owners who would be unlikely to consider benefits to the wider area and development without clear guidance from Council. Developers will forgo opportunities to optimise returns due to the pressure to handle the stormwater onsite and an increased roading requirement as they will not be able to connect to their developments.

## **4. FEASIBLE LAND FOR RESIDENTIAL DEVELOPMENT**

Each of these options contain different restrictions that limit the amount of land that can be considered feasible for development. While almost anything can be built anywhere if a customer is willing to pay for it, it is unrealistic to expect that all land will be developed when the cost of development would exceed a reasonable profit, especially in Whanganui where there is no shortage of affordable options.

Typical restrictions that can limit the feasibility of a development include:

- a. Physical Feasibility – development constraints, site amalgamation
- b. Economic Feasibility – development costs, government taxes & levies, property market
- c. Forecast Feasibility – demand, depreciation
- d. Regulatory Feasibility – District Plan, regional plans, national environmental standards

These are discussed below:

### **4.1. Physical Feasibility**

The southern and western sectors of the Otamatea West study area comprises constraints which influence construction costs. Conversely, leaving such land vacant has several benefits for the development of the wider study area including:

- Preserving overland flow paths;
- Retaining a view of the city, river and ocean for adjoining residential developments;
- The potential to create an amenity area and linkages within the study area;

- Use the area for stormwater detention;
- The preservation of known archaeological sites which are largely within the area; and
- Low-lying land to the south or hilly land may be less desirable to the market (usually due to increased engineering costs for drainage and less sunlight).

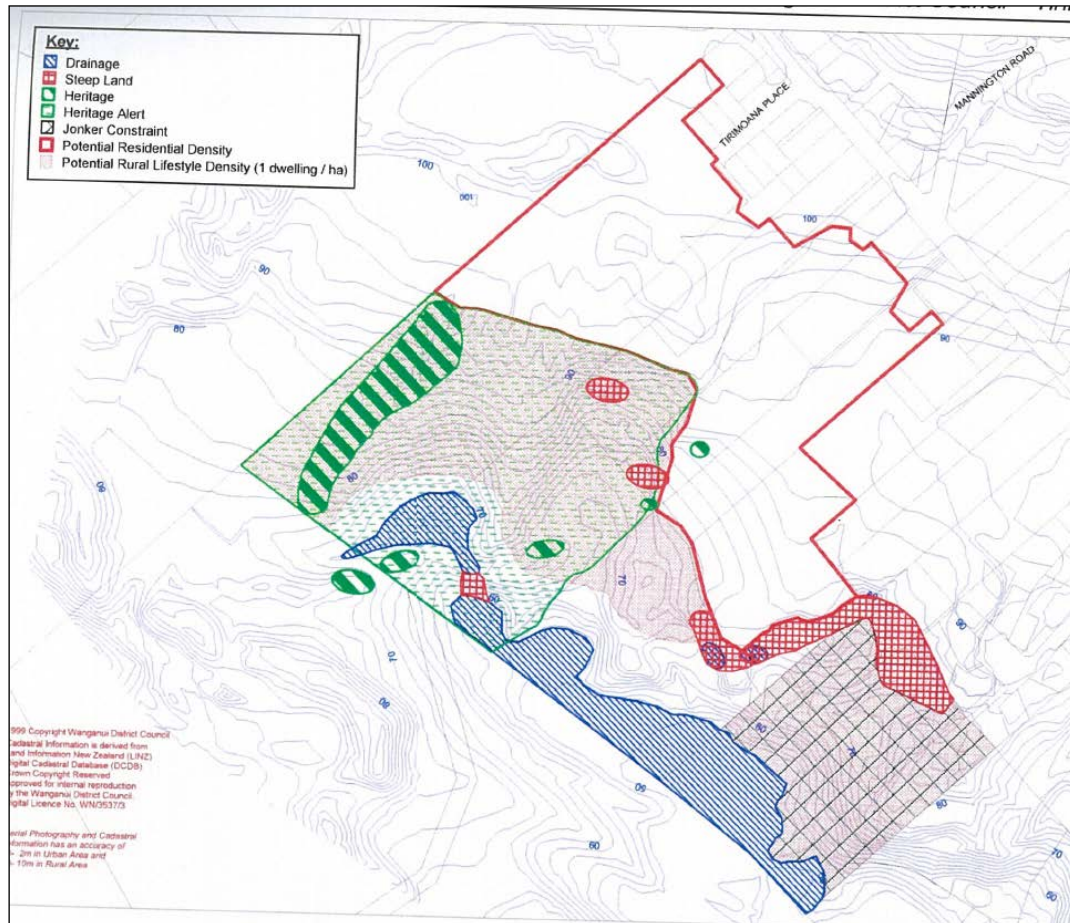


Figure 10: An example from the 2011 Structure Plan highlighting the physical constraints in the study area.

## 4.2. Economic Feasibility

The type and extend of physical constraints strongly influences the potential costs of construction. With land being very affordable in Whanganui, this means that the site development costs are an important determination to economic feasibility for developers in this District. Land is affordable and does not vary in price markedly within the District.

## 4.3. Forecast Feasibility

As mentioned earlier in the report, there is current and forecasted demand for residential land in Otamatea. Orderly development to facilitate efficient, integrated and cost effective development to a wide area is achieved by managing the release

of land to the market. Feasible land only should be zoned for residential development or this will distort costs and reduce the ability to achieve quality developments. It is intended that the supply can be controlled by the market demand by releasing the land in stages once a certain percentage of the adjoining land has been sold.

#### **4.4. Regulatory Feasibility**

This will be set by the proposed provisions developed for any Plan Change and potential development plan for the area. It will likely include regulation of lot sizes and facilitate the staging of development areas. The regulatory planning framework can be utilised to guide development location, integration of design and services, density of development and quality of urban design. Local and national legislation will guide safety and cost distribution. These can also influence the feasibility of development.

### **5. SHORTFALL OF RESIDENTIAL LAND**

The RGS forecast indicated a shortfall of 667 dwellings, 335 of those in Otamatea. The status quo does not achieve the required number of dwellings. Both options 1 provide 2 provide too much potential housing supply at a 400m<sup>2</sup> minimum lot size, which is the existing Residential Zone minimum. Current market trends indicate that 800-1200m<sup>2</sup> are the typical lot sizes demanded in this area. Subdivisions completed in the last five years in the vicinity indicate an average section size of 1100m<sup>2</sup> is preferred by developers, who are in turn influenced by the market. Typically lots at the edge of the urban area will be larger than those closer to the centre. Combined with the infill from the larger lots within Otamatea, either option would resolve the potential housing demand shortage.

It is also important to note that using maximum density analysis is not an accurate tool. It is an estimate of the maximum number of houses only. It is not what will happen and does not consider market constraints.

### **6. RECOMMENDATION AND NEXT STEPS**

It is in the community's best interest for Council to be proactive and plan for increased residential development at Otamatea. After considering the options, Otamatea West is the best option for feasible development and Option 2 will open up the maximum feasible land without overloading the land or infrastructure's ability to deal with the stormwater or wastewater generated by the potential residential activities.

In order to achieve the objective of a sufficient development capacity within the area that the market demands, a Plan change combined with a structure plan to stage and control the placement of essential infrastructure would be the most efficient and effective use of resources. An overarching framework should be used to guide the framing of such a structure plan and should draw from the following sources:

- Whanganui Leading Edge Strategy (2015)
- Whanganui District Council's Engineering Code for Land Development and Subdivision Engineering (2012)
- Asset Management Plans (various)

#### **Next Steps**



This scoping report has been reviewed internally by the Infrastructure Team and if the recommendations are supported by the ELT, we will proceed with a Plan change. This will commence with:

1. Formulation of an Engagement Plan (for internal and external stakeholders).
2. We would approach directly affected landowners as soon as practical to introduce the broad proposal, identify any particular issues or development plans already being contemplated.
3. A second priority would be to socialise the broad rationale for a Plan change with potentially affected stakeholders.
4. Complete an update of the Tirimoana Structure Plan 2011 to provide a development structure plan appropriate for the Plan change and expanded subject area.
5. Draft Plan provisions in liaison with Infrastructure and stakeholders.