



Shaping Whanganui

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Whanganui District Council District Plan Review Phase Six

Section 32 Report

Proposed Plan Change 46 Otamatea West

Prepared by:
Dated:

WDC Policy Team
August 2017

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1. INTRODUCTION

1.1 PLAN CHANGE PROCESS

Section 73 of the Resource Management Act 1991 (the RMA) provides for councils to initiate plan changes as necessary and appropriate. The process for initiating changes to a district plan is set out in the First Schedule to the RMA.

In December 2016, a Scoping Report was presented to Whanganui District Council identifying options to provide additional land for residential activities at Otamatea. Council resolved at that meeting, to commence a change to the District Plan and to complete a structuring planning exercise to inform and facilitate a change to provide additional land for residential activities at Otamatea West.

The RMA specifies that consideration of the efficiency and effectiveness of existing provisions is the first step. Section 32 of the RMA requires Council to carry out an evaluation of options before notifying a proposed plan change. The efficiency and effectiveness of the provisions in achieving the stated objectives is analysed in this report, as are the various options that were considered.

1.2 STATUTORY AND LEGISLATIVE FRAMEWORK FOR THE REVIEW

1.2.1 Resource Management Act 1991

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

Territorial authorities have the following functions under the RMA:

31 Functions of territorial authorities under this Act

1. *Every territorial authority shall have the following functions for the purpose of giving effect to this Act in its district:*
 - a. *The establishment, implementation, and review of objectives, policies and methods to achieve integrated management of the effects of the use, development or protection of land and associated natural and physical resources.*
 - aa. *the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district:*

...
 - f. *any other functions specified in this Act.*
2. *The methods used to carry out any of the functions under subsection (1) may include the control of subdivision.*

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

5(2) In this Act, “sustainable management” means managing the use, development, and protection of natural and physical resources in a way, or at a rate, which

enables people and communities to provide for their social, economic, and cultural wellbeing and for their health and safety while:

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

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

1.2.2 National Planning Standards

As a result of the 2017 RMA amendments, the Ministry for the Environment are currently preparing the National Planning Standards. Part of the standards include standardizing the zoning and overlays of District Plans.

The Plan Change has been prepared in accordance with this discussion paper on standardizing District Plans in order to reduce the need for additional Plan Changes. This has occurred by using a “Structure Plan Area” notation on the planning maps, rather than an overlay to advise the public when to consider the specific structure plan provisions.

1.2.3 National Policy Statements and National Environmental Statements

The RMA requires that district plans give effect to any relevant national policy statements or national environmental standards (NPS and NES). A NPS sets a national direction and a NES sets specific minimum standards to be enforced by each Council.

The National Policy Statement on Urban Development Capacity 2016 (NPSUDC) provides direction to Council on planning for urban environments to:

- enable urban environments to grow and change in response to the changing needs of the communities, and future generations; and
- provide enough space for their populations to happily live and work. This can be both through allowing development to go “up” by intensifying existing urban areas, and “out” by releasing land in greenfield areas.

It requires Whanganui District Council to provide within the District Plan enough development capacity to ensure that demand can be met for the next thirty years. This development capacity must be commercially feasible to develop and plentiful enough to recognise that not all feasible development opportunities will be taken up.

The purpose of this Plan change is to achieve the requirements of the NPSUDC in regards to Otamatea which has a high demand for residential lots.

The requirements of the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health (2011) were incorporated into the Plan via Plan Change 27, and will be applicable to any land rezoned as part of PC46.

1.2.4 Regional Policy Statement

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

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

Regional One Plan		Proposed Plan Change 46	
Issue	Objective	Policy	Evaluation
<p>3-3 The strategic integration of infrastructure with land use – urban development that is not strategically planned can result in the piecemeal and inefficient provision of associated infrastructure.</p>	<p>3-3 The strategic integration of infrastructure with land use – Urban development occurs in a strategically planned manner which allows for the adequate and timely supply of land and associated infrastructure.</p>	<p>3-4 The strategic integration of infrastructure with land use – Territorial Authorities must proactively develop and implement appropriate land use strategies to manage urban growth, and they should align their asset management planning with those strategies, to ensure the efficient and effective provision of associated infrastructure.</p>	<p>PC46 is consistent with the One Plan issue, objective and policy in that by creating further residential areas on land, identified as generally appropriate for that purpose and where specific impediments are proposed to be addressed (predominately through the Structure Plan) it allows for planned development, and infrastructure rather than the pressures for piecemeal development with ad hoc residential scale subdivision proposals in the Rural Lifestyle zone.</p>

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 2043¹.

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 weeks².

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 400m².

Currently in the Otamatea area, there is a 1000m² 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 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.

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

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

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

will be managed through the application of the 'Otamatea West Structure Plan Area' to provide 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.

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

The concept of providing additional residential capacity at Otamatea has long been discussed by Council. During the first round of consultation the following occurred:

- 16 September 2015 to 28 September 2015 – phone calls to landowners directly affected by PC46, advising of the upcoming Plan change process. Issues raised related to the impact on the value of the properties, whether there would be any change in the rates, and what plans Council had for any further stormwater work in the area.
- 28 September 2015 - Council sent a letter to all landowners whose land was proposed to change zone and stakeholders with properties in close proximity giving them an opportunity to provide comments to Council by 30 October 2015.
- 28 September 2015 – A brief summary of PC46 and a copy of the map of the areas to be rezoned was placed on the Council's website (Shaping Wanganui – Phase 6 – Proposed Plan Change 46 Residential Zones Expansion) asking for feedback by 30 October 2015.

The Plan Change was then placed on hold, awaiting further infrastructure modelling, which would make the development more feasible. As a result of this, a new Structure Plan was developed, with changes to the area of re-zoning proposed.

This revised area for re-zoning was consulted on in the following manner:

- 19 May 2017 – Letter to landowners advising them of the revised Structure Plan and Plan Change.
- 26 July 2017 – Presentation to Rotary group on upcoming Plan Changes. Included Otamatea West and what was sought by the Plan Change.
- 8 August 2017 – Letter to landowners and stakeholders advising them of the completed Structure Plan and the opportunity to attend an Open Forum on 17th August. Stakeholders were also advised to ring, email or come to 101 Guyton Street if they wished to discuss the Plan Change. This was taken up by a number of stakeholders.
- 9 August 2017 – A copy of the Structure Plan and proposed District Plan text was placed online.
- 17 August 2017 – Open Forum at the Dog Park Clubrooms between 4.00pm and 6.30pm.
- 18 August 2017 - Presentation to valuers group on upcoming Plan Changes. Included Otamatea West and what was sought by the Plan Change.

- 19-20 August 2017 – Council’s stand at the Home Show contained information on the Otamatea Plan Change and Structure Plan.

Section 32(4A) of the RMA requires this evaluation report to summarise all advice concerning the Plan change received from Iwi authorities and Council’s response.

The Iwi authorities that claim mana whenua and whose rohe includes the subject area are Te Rununga O Tupoho and Ngaa Rauru Kiiitahi.

Date	Iwi involved	Activity	Response
18 May 2017	Beryl Miller on behalf of Tupoho.	Email from Council outlining the area of the Plan Change and the known archaeological sites. Requesting if Iwi wish to be engaged.	Acknowledgement of email on 18/05/2017 by Beryl Miller.
18 May 2017	Nicola Patrick on behalf of Ngaa Rauru Kiiitahi.		Verbal acknowledgement of email on 18/05/2017 by Nicola Patrick.
6 June 2017	Mahalia Tapa-Mosen on behalf of Ngaa Rauru Kiiitahi.	Emails requesting further information on the area of the Plan Change and archaeological information known to date to pass onto marae for comment.	Information provided via email.
7 June 2017	Beryl Miler, John Maihi and Marianna Waitai on behalf of Tupoho.	Meeting to discuss the scope of the Plan Change, known archaeological information and the timeframe.	Information provided and recorded in an email to parties.
27 July 2017	Mahalia Tapa-Mosen on behalf of Ngaa Rauru Kiiitahi.	Phone call from Ngaa Rauru Kiiitahi for additional information.	Spoke for 10 minutes answering questions on reasons behind plan change and how development protect archaeology.
1 August 2017	Anne-Marie Broughton on behalf of Ngaa Rauru Kiiitahi.	Letter to Council requesting a Ngaa Rauru Kiiitahi Interim Cultural Values Report, funding to carry out the assessment and additional time to complete it.	Council letter of 4 August 2017 acknowledged the request but considered cultural values could be explored in detail as development was proposed, given the 50 year horizon, and the fact that the entire area would be identified as an archaeological area,

Date	Iwi involved	Activity	Response
			and the protection this affords.
9 August 2017	Beryl Miller, Jill Sheehy, John Maihi and Marianna Waitai on behalf of Tupoho and Mahalia Tapa-Mosen on behalf of Ngaa Rauru Kiiitahi.	Email to Iwi to advise of a public forum to discuss the Plan Change and Structure Plan. A link to the full Structure Plan and a copy of the map was attached.	Mahalia Tapa-Mosen on behalf of Ngaa Rauru Kiiitahi requested a meeting.
12 August 2017	Beryl Miller on behalf of Tupoho.	Email to Tupoho summarising the Plan Change and asking if additional consultation is required.	Email acknowledged.
14 August 2017	Beryl Miller on behalf of Tupoho and Mahalia Tapa-Mosen on behalf of Ngaa Rauru Kiiitahi.	WeTransfer link emailed to send a copy of the archaeological report and draft Plan Change text.	Confirmation from WeTransfer that documents were downloaded by both parties.
16 August 2017	Marty Davis, Mahalia Tapa-Mosen and Nicola Patrick on behalf of Ngaa Rauru Kiiitahi.	Meeting requested by Ngaa Rauru Kiiitahi to discuss a different approach.	Council agreed that it is not for Council to determine if there are cultural values to consider and have therefore agreed to a scoping report of the Cultural Values.
21 August 2017	Beryl Miller on behalf of Tupoho.	Meeting following informing Tupoho on 18 th August of the cultural scoping report.	Confirmed that Tupoho wanted a cultural scoping report also and would be working jointly with Ngaa Rauru Kiiitahi.

The outcome of consultation with Tangata Whenua is that a scoping report of the cultural values of the area will be prepared and made available to Council as a submission to PC46. The public will be able to view and comment on it as part of the further submission process and any new information uncovered by the cultural report can be considered during the hearing.

Notification of all parties required by clause 5, 1st Schedule RMA will occur following any decision of Council to notify. Notification is tentatively planned for 9 September 2017.

3. PART 2 – SECTION 32 EVALUATION

3.1 REQUIREMENT TO MAKE AN EVALUATION

The RMA requires that when a Council undertakes a plan change it must produce a report evaluating the proposed provisions. This is known as a Section 32 Report. This report contains an evaluation of the proposed Plan change, prepared in accordance with section 32 of the RMA (as amended 2017).

The evaluation examines (Section 32(1)):

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

The examination must (Section 32(2)):

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

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
Option A	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 ² minimum lot size in the Residential Zone at Otamatea.
Option 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 ² which currently applies to all other Residential zoned sites in Whanganui.

Benefits and costs of each option are considered below.

	Benefits	Costs
Option A - Maintain the Status Quo Otamatea Development Overlay is retained.	<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>Current NPS requirements to provide sufficient development capacity are not reflected in the Plan.</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>
Option B – Remove the Otamatea Development Overlay. The underlying Residential Zone density will apply.	<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>Plan Change process costs.</p> <p>Potential need to upgrade infrastructure in the area more quickly than planned.</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>	
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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

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

Options		Explanation
Option 1	Maintain the Status Quo – Consider development proposals on an ad hoc basis.	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 ² and a presumption against connections to the urban reticulated networks for stormwater and wastewater.
Option 2	Re-zone the Otamatea West study area to Residential. (no Structure Plan)	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.
Option 3	Re-zone most of the Otamatea West study area to Residential, incorporate the Otamatea West Structure Plan.	This option would zone most of the land within the study area to Residential and incorporate the Structure Plan. This would require development to take into account, and provide for the wider community values and allow Council to plan for infrastructure requirements and upgrades in a comprehensive manner.

Benefits and costs of each option are considered below.

	Benefits	Costs
Option 1 - Maintain the Status Quo 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.	Least financial cost in the short term as minimal requirement for Plan Change. Minimal short term cost for Council in terms of planning and asset management.	Current NPS requirements to provide sufficient development capacity are not reflected in the Plan. 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.

		<p>Potential for inconsistent decision making in these areas.</p> <p>Applications to develop and subdivide in this area more likely to be declined.</p>
<p>Option 2 - Re-zone the Otamatea West study area to Residential.</p> <p>(no Structure Plan)</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>	<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 400m², 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>	<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>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.</p> <p>Less protection of archaeological and cultural sites and values as only minimal provision in the District Plan.</p>
<p>Option 3 - Re-zone the Otamatea West study area to Residential and incorporate the Otamatea West Structure Plan into the District Plan.</p> <p>(minimum lot size 800m²)</p>	<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 existing Residential Zone.</p> <p>A high amenity residential environment can be developed.</p>	<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 potentiation for interim restrictions on existing development to preserve options to achieve transport network connectivity in the longer term. This will likely create some consent costs for a few landowners.</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.</p> <p>Full protection of identified and unidentified archaeological and cultural sites within the Structure Plan area.</p>	
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Option Three is the recommended option.

This option maximises the potential returns for developers and Council by focusing on land that is feasible to develop 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.

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 the entire structure plan area as a potential archaeological site.

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.

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.

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.

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 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.
- Insert and amended version of Figure 12 of the Otamatea West Structure Plan report as Appendix L to the District Plan and show as a layer on the 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 on the District Plan maps. Identify them as indicative roads.
- 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 (2015).
- Archaeological Assessment for Otamatea West Structure Plan Area, Whanganui, Archaeology North Ltd (August 2017)
- Otamatea West Structure Plan, Opus Consultants Ltd (August 2017).

3.2.5 Appropriateness of the Plan Change

Whether or not the Plan change is necessary or appropriate is directly linked to sections 6, 7 and 8 of the Resource Management Act 1991. This Plan change is considered necessary to achieve the purpose and principles of the RMA because it assists Council to meet the following:

6 Matters of national importance

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall recognise and provide for the following matters of national importance:

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

7 Other matters

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall have particular regard to—

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

(c) the maintenance and enhancement of amenity values:

8 Treaty of Waitangi

In achieving the purpose of this Act, all persons exercising functions and powers under it, in relation to managing the use, development, and protection of natural and physical resources, shall take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Plan Change 46 plays an important supporting role in ensuring that Council meets its obligations under Sections 6, 7 and 8 of the Resource Management Act.

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 are the most efficient and effective means available to Council to achieve its obligations as set out in the RMA.

Chapter 3 RURAL ENVIRONMENT

3.6 RULES – RURAL LIFESTYLE

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 the Otamatea West Structure Plan.

Council restricts its discretion to the following matters:

- i. Implementation of the Otamatea West Structure Plan.

3.7 PERFORMANCE STANDARDS – Rural Lifestyle

3.7.1 Amenity.

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

Chapter 4 RESIDENTIAL ENVIRONMENT

Structure Plans have been developed for Springvale and Otamatea West to facilitate high quality residential by managing the location, form and scale. This provides for sustainable development and future growth.

4.1 ISSUES

4.1.6 Otamatea West has been experiencing residential development pressures. Adhoc development made without consideration of an overall land use framework to guide and direct growth can result in inappropriately located and designed activities.

4.3 POLICIES

4.3.9 Residential development at Otamatea West shall ensure quality urban design outcomes and efficient infrastructure provision, with particular regard given to achieving consistency with the indicative roading layout, three water infrastructure, historic heritage features and landscaping.

4.3.10 Development which propose to vary from the Otamatea West Structure Plan are encouraged provided the following key criteria to ensure quality urban design outcomes and efficient infrastructure provision are adhered to, by requiring that development:

- a. Creates purposeful linkages for vehicles and for active modes of transport which are safe, pleasant and work with the natural landform;
- b. Establishes road linkages to existing residential development adjacent to the Structure Plan area and achieves quality road linkages in all four directions as currently proposed.
- c. Manages 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. Ensures residential development and associated infrastructure are designed to work with the natural landscape as far as possible.
- e. Avoids lengthy private rights of way where a road access to serve rear sections is appropriate.
- f. Enhances stormwater management and cycle/pedestrian networks to facilitate the potential for ecological corridors through the Structure Plan area.

4.4 RULES - RESIDENTIAL ZONES

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 400m² except that;

- within the Otamatea West Structure Plan (pink shaded area) the minimum lot size is 800m².

f. Structures located on or within 5 metres of the indicative road identified in the Otamatea West Structure Plan.

Council restricts its discretion to the following matters:

- Implications for implementation of the Otamatea West Structure Plan.

4.5 PERFORMANCE STANDARDS – Residential

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 the Otamatea West Structure Plan.

4.5.5 Amenity.

a. Minimum net site area is 400m² per dwelling, except that within the Otamatea West Structure Plan (pink shaded area) the minimum net site area per dwelling is 800m².

Chapter 13 SUBDIVISION AND INFRASTRUCTURE

13.3 POLICIES

Development and Structure Plans

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.

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) 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 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.

[Renumber the remaining policies]

13.4 RULES

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:

- iii. Implications for the implementation of the Otamatea West Structure Plan.

13.4.3 Discretionary Activities.

The following are discretionary activities:

- c. Subdivision in the Residential zone that does not meet the minimum net allotment size of:
 - i. 400m² (excluding sites within the Otamatea West Structure Plan pink shaded area)
 - ii. 800m² on sites within the Otamatea West Structure Plan pink shaded area
- d. Subdivision not in accordance with the Otamatea West Structure Plan.

13.5 PERFORMANCE STANDARDS – SUBDIVISION

13.5.4 Allotment size.

- a. New allotments, including balance allotments, shall meet the requirements of the following table:

Zone	Allotment Size Requirements - Net Site Area – Metres ² (m ²) or Hectares (ha)
Residential (excluding Otamatea West Structure Plan pink shaded area)	Minimum 400m ²
Residential (Otamatea West Structure Plan pink shaded area)	Minimum 800m ² ,

13.5.10 Transport.

- a. Any applications for subdivision shall not include the creation of segregation strips or any other mechanism that:
- b. Prevents connectivity or connections to a proposed road in the Springvale Indicative Future Development Area or the Otamatea West Structure Plan Area (OWSPA), or;

13.5.15 Stormwater.

- f. Low impact stormwater treatment.
 - ii. Where low impact stormwater approaches including swales, rain gardens, and other mechanisms are proposed or required, these shall:
 - Be required to be approved by the Alternative Design Procedure, excluding the construction of the swale in the Springvale Indicative Future Development Area or the stormwater detention areas identified in the Otamatea West Structure Plan.

APPENDIX K - ARCHAEOLOGICAL and OTHER ITEMS

Note: To avoid confusion, numbers without items are marked as Blank

Note**: Sites without an indicated Buffer shall default to an estimated buffer of 50m . These rural sites have not been specifically researched. The Historic Places Act applies regardless of any District Plan Buffer specified so care should be taken beyond any buffer also.

List No.	NZAA NO.	Description	Longitude	Latitude	Comments	Buffer	WDC No.	Urban Map No.	Rural Map No.
325	R22/544	Midden , fire cracked rock and possible pit	2682049.09 2682050	6142113.39 6142119.4	WRSR	25		Urban 8	Rural 18
326	R22/540	Pits – nine pits and possible terracing on sand ridge	2682252.02 2682251	6142143.39 6142141.3	Location good	100x20		Urban 8	Rural 18
327	R22/539	Pits – at least five pits and possible terracing	2682122.04 2682124	6142153.36 6142147.4		50		Urban 8	Rural 18
328	R22/541	Pits – two well defined pits on sand ridge end	2682357.09 2682364	6142204.27 6142197.3	WNP	15		Urban 8	Rural 18
329	R22/542	Pits and Midden –two shallow pits	2682425.04 2682429	6142269.24 6142269.2	WNP	15		Urban 8	Rural 18
330	R22/543	Midden , fire cracked rock and probable pits, terraces and borrow holes	2682084.09 2682084.1	6142283.36 6142285.4	WNP?	150x25		Urban 8	Rural 18
983		Historic house site	2682144.2	6142535.3	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18
984		Midden	2682006.2	6142560.4	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18
985		Fire cracked rocks - haangi	2681924.2	6142445.4	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18
986		Midden	2682164.1	6142389.3	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18
987		Fire cracked rocks - haangi	2682224.1	6142401.3	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18
988		Midden	2681979	6142111.4	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18
989		Midden	2681797.1	6142215.5	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18
990		Midden	2681807.1	6142185.5	Indicative location only	Otamatea West Structure Plan Area		Urban 3 Urban 8	Rural 18

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 archaeological sites known about, the removal of the Otamatea Development Overlay and identifying the entire area affected by the Structure Plan.

Summary of benefits	<p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p> <p>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.</p>
Summary of costs	<p>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.</p> <p>Economic - Some developers and owners will be restricted due to the location of the indicative roads.</p> <p>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.</p> <p>Social/Cultural – some cultural values or archaeological sites will be disturbed and potentially destroyed.</p>
Effectiveness	<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. This provides increased certainty to developers and ratepayers, while keeping the provisions flexible enough to consider alternative solutions.</p> <p>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.</p>
Efficiency	

	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	<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> <p>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.</p>

4. Conclusion

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.