

22 August 2016

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File ref: RAI 0407
2016
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Dear Sir/Madam

HORIZONS SUBMISSION TO PROPOSED PLAN CHANGE 49

Please find attached Horizons Regional Council's submission to Proposed Plan Change 49 (Appendix G Building Design Review) to the Whanganui District Plan. Please also find attached a copy of Horizons feedback letter in reply to the draft version of this plan change, which is Annex A to this submission.

Horizons wishes to be heard in respect to this submission.

We welcome the opportunity to work with the Wanganui District Council to resolve or narrow any issues raised in our submission prior to the Hearing.

Yours sincerely



Lisa Thomas
COORDINATOR DISTRICT ADVICE

Encls. Horizons Submission on Proposed Plan Change 49
Annex A – Copy of Horizons feedback letter on the draft Plan Change

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

Resource Management Act 1991

Submission on a Publicly Notified Plan Change to the Whanganui District Plan

In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

To: Whanganui District Council
PO Box 637
Wanganui

Name: Horizons Regional Council

Contact Person: Lisa Thomas, Coordinator District Advice

Thank you for the opportunity to make a submission on Proposed Plan Change 49 to the Whanganui District Plan.

1. We **could not** gain an advantage in trade competition through this submission.
2. The specific provisions of the proposed plan change that our submission relates to are outlined below.
3. Our submission points are detailed below.
4. The decisions sought from Whanganui District Council are detailed below.
5. We **do** wish to be heard in support of this submission.
6. We welcome any opportunity to attend informal or formal pre-hearing meetings with Whanganui District Council (WDC) and other parties to discuss points of contention.
7. If others make a similar submission we **would** be prepared to consider presenting a joint case with them to any hearing.
8. **Address for Service:** Horizons Regional Council
Private Bag 11025
Palmerston North

Email: lisa.thomas@horizons.govt.nz



Signed:

Lisa Thomas
COORDINATOR DISTRICT ADVICE

Dated: 22 August 2016

BACKGROUND

1. We do not wish to comment on the substantive aspects of the Town Centre and Outer Commercial Design Guidelines as Horizons does not have a role in management of built infrastructure and urban design matters. However, we wish to provide comments in relation to considerations for buildings within flood affected areas, management of stormwater in the outer commercial zone and provision of cycle infrastructure.

ONE PLAN POLICY CONTEXT

2. One Plan Policy 9-2 generally discourages new development in areas that are at risk of flooding in a 0.5% Annual Exceedance Probability (AEP) (1 in 200 year) flood event. Where flood hazard cannot be avoided, we recommend that the flood risk be mitigated. Mitigation measures include ensuring that occupied structures have a finished floor level that includes reasonable freeboard above the 1 in 200 year flood level. The One Plan only contains flood hazard policies, not rules. Horizons' role is to provide city and district councils with useful data to help with decision making around plan changes and subdivision development. This includes information on the 0.5% AEP flood surface, which can be used to determine appropriate finished floor levels, or other flood mitigation methods, for new buildings in floodable areas.
3. Given the need to maintain visual and physical connections between the central city area and the Whanganui River and the commercial importance of riverfront development to Whanganui, an additional clause was added to Policy 9-2 of the One Plan through the Appeals process. Clause (f) of One Plan Policy 9-2 (Development in areas prone to flooding) states that:

(f) Despite Policy 9-2(d)(i) and (ii), within that part of the Wanganui central city bounded by Bates Street, Ridgway Street and Victoria Avenue, flood hazard mitigation measures will not be limited to considering flood height and flow but will include such methods as resilient construction and emergency management systems.
4. This means that new buildings and alterations to existing buildings within the central city area outlined in Clause (f) above have the option of using alternative methods to mitigate flood risk, including resilient building design that either protects buildings from inundation or allows quick recovery following inundation.

DEVELOPMENT IN AREAS PRONE TO FLOODING

5. Horizons provided feedback on the draft versions of the Town Centre and Outer Commercial Design Guidelines in March 2016. A copy of our letter is attached as Annex A to this submission. In general, we considered that more guidance on resilient building design would be of benefit to plan users and is supported by reference to such matters within the Whanganui District Plan and Policy 9-2(f) of the One Plan. We also recommended that consideration be given to including an advice note encouraging plan users to consult with Horizons with respect to flood depths and velocities, and finished floor level advice.

6. In response to this feedback, an advice note was added to the Town Centre Design Guideline, as follows:

“Where any development is proposed in areas that are at risk of flooding (refer to District Plan Maps) advice should be sort from Horizons Regional Council with respect to flood depths and velocities, and finished floor level.”

7. Horizons acknowledges WDC’s positive response to our initial feedback, but after further consideration seeks an amendment to the guidance note to ensure it is more consistent with Policy 9.2(f) in the One Plan for Whanganui central city. Horizons seeks that the reference to “finished floor level” in the advice note be replaced by “flood level”. This is because clause (f) of One Plan Policy 9-2 provides for alternative flood mitigation methods including resilient building design and emergency management systems within that part of the Wanganui central city bounded by Bates Street, Ridgway Street and Victoria Avenue. Therefore, in some instances WDC may approve the construction of new buildings that have finished floor levels below the 200 year flood surface, if alternative flood mitigation methods are employed. Reference to “finished floor level” in this advice note may have the unintended consequence of appearing to limit consideration of these alternative methods. Reference to “flood level” makes it clearer that Horizons advice may be used by WDC in deciding both floor levels and alternative flood mitigation methods when making decisions on building consents.

8. Horizons requests that the advice note in section 1.0 of the Town Centre Design Guide be retained, subject to minor amendments, as follows:

“Where any development is proposed in areas that are at risk of flooding (refer to District Plan Maps) advice should be ~~sort~~ sought from Horizons Regional Council with respect to 0.5% AEP (1 in 200 year) flood water depths, and velocities, and finished floor flood level.”

9. In our feedback on the draft design guidelines, we recommended that consideration be given to adding a new section within both design guides that is dedicated to resilient building design. We considered that the District Plan definition could be used as a starting point in relation to what methods and examples could be included. In the evaluation of the how the provisions of Proposed plan Change 49 are consistent with the One Plan (refer to the table in Section 1.2.2 of the s32 Report), the officer acknowledges that *“further guidance could be provided through the District Plan on what constitutes ‘resilient building design.’ This is intended to be dealt with in a future phase of the District Plan review.”*
10. We generally support the intent of the Whanganui District Council to provide further guidance on resilient building design within the District Plan through a future plan change. However, if the Town Centre Design Guide is to be the key reference document referred to by developers and building designers when designing new buildings, we think the inclusion of advice on resilient building design would be of benefit to plan users. A possible consequence of not providing advice on resilient building design in the guidelines may be lower uptake of alternative methods than anticipated.

Decisions Sought

- That the advice note in section 1.0 of the Town Centre Design Guide be retained, subject to minor amendments, as follows:

“Where any development is proposed in areas that are at risk of flooding (refer to District Plan Maps) advice should be ~~set~~ sought from Horizons Regional Council with respect to 0.5% AEP (1 in 200 year) flood water depths, and velocities, and finished floor flood level.”

- That the Town Centre Design Guideline be amended to include advice on resilient building design.

STORMWATER MANAGEMENT

11. Management of stormwater is largely the responsibility of the Whanganui District Council. However, the One Plan does include one rule relating to stormwater (Rule 14-18). Within commercial areas, Horizons is primarily concerned with ensuring that stormwater discharges do not cause or exacerbate flooding of any other property (Condition (b) of Rule 14-18).
12. Horizons supports proposed guideline GB14 in the draft Town Centre Design Guide and guidelines CP6 and GB13 in the draft Outer Commercial Design Guide which encourage the use of permeable paving as a means of reducing storm water runoff from carparking areas. We also support guideline CP3 in the Outer Commercial Design Guide which encourages planting in car parking areas as a way of reducing storm water flow from the site. These suggested measures will help to minimise localised flooding from stormwater run-off. We request that these guidelines are retained as drafted in PC49.

Decisions Sought:

- That proposed guideline GB14 in the draft Town Centre Design Guide is retained as drafted in PC49.
- That proposed guidelines CP3, CP6 and GB13 in the Outer Commercial Design Guide are retained as drafted in PC49.

CYCLE INFRASTRUCTURE

13. Horizons supports proposed guidelines GB15 in the Town Centre Design Guide and GB14 in the Outer Commercial Building Design Guide which encourage new developments to provide cyclist parking. We request that these guidelines be retained as drafted in PC49. The provision of urban cyclist infrastructure will help give effect to Policies 3.1 and 4 of the Regional Land Transport Plan (RLTP) 2015-2025. Policy 3.1 of the RLTP requires land use planning to recognise potential impacts on existing transport systems, including by ensuring that that new development includes

provision for cycling. Policy 4 of the RLTP encourages the uptake of walking and cycling as transport modes and for recreation. The methods for achieving Policy 4 of the RLTP include providing new infrastructure where appropriate and maintaining current facilities to appropriate standards.

Decisions Sought:

- That proposed guideline GB15 in the draft Town Centre Design Guide is retained as drafted in PC49.
- That proposed guidelines GB14 in the Outer Commercial Design Guide is retained as drafted in PC49.

Thanks again for the opportunity to make a submission on proposed Plan Change 49.

Please feel free to contact me (email Lisa.Thomas@horizons.govt.nz) if you wish to discuss any of the matters raised in this submission.



Lisa Thomas
Coordinator District Advice
HORIZONS REGIONAL COUNCIL

Attachments:

Annex A – Feedback letter from Horizons on the draft Town Centre & Outer Commercial Design Guidelines

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21 March 2016

Leayne Huirua
 Whanganui District Council
 PO Box 637
 WANGANUI 4540

File ref: RAI 04 07
 2016
 LT:RP

BY EMAIL ONLY
leayne.huirua@wanganui.govt.nz

Dear Leayne

WANGANUI DISTRICT PLAN REVIEW – PLAN CHANGES 49 AND 50 – TOWN CENTRE BUILDING DESIGN GUIDELINES AND OUTER COMMERCIAL BUILDING DESIGN GUIDELINES

Thank you for notifying us of the Whanganui District Council's intention to review the Building Design Guidelines for the town centre, and to introduce guidelines for the outer commercial area.

We do not wish to comment on the substantive aspects of the guidelines as Horizons does not have a role in management of built infrastructure and urban design matters.

We do however wish to provide some feedback in relation to considerations for buildings within flood affected areas and management of stormwater in the outer commercial zone.

Building Design in Floodable Areas

The draft guidelines for the town centre and the outer commercial area do not identify those areas at risk of inundation in a 0.5% AEP flood event, or how buildings can be designed to mitigate this risk. We consider that more guidance on resilient building design would be of benefit to plan users and is supported by reference to such matters within the Whanganui District Plan and Policy 9-2(f) of the One Plan. We also recommend that consideration be given to including an advice note encouraging plan users to consult with Horizons with respect to flood depths and velocities, and finished floor level advice.

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

As shown on District Plan Map U22, parts of the Town Centre and Outer Commercial area have been modelled as likely to flood in a 1% Annual Exceedance Probability (AEP) (1 in 100 year) and 0.5% AEP (1 in 200 year) flood event. Figure 1 below is copied from District Plan Map U22. The dark blue jagged line shows the 1% AEP flood level and the green line shows the 0.5% AEP flood level. Land between the Whanganui River and these lines is considered flood prone.



Figure 1: Extract of Planning Map U22 showing the 1% and 0.5% AEP modelled flood extents

One Plan Policy 9-2 generally discourages new development in areas that are at risk of flooding in a 0.5% AEP (1 in 200 year) flood event. Where flood hazard cannot be avoided, we recommend that the flood risk be mitigated. Mitigation measures include ensuring that occupied structures have a finished floor level that includes reasonable freeboard above the 1 in 200 year flood level.

Given the need to maintain visual and physical connections between the central city area and the Whanganui River and the commercial importance of riverfront development to Whanganui, an additional clause was added to Policy 9-2 of the One Plan through the Appeals process. Clause (f) of One Plan Policy 9-2 (Development in areas prone to flooding) states that:

- (f) *Despite Policy 9-2(d)(i) and (ii), within that part of the Wanganui central city bounded by Bates Street, Ridgway Street and Victoria Avenue, flood hazard mitigation measures will not be limited to considering flood height and flow but will include such methods as resilient construction and emergency management systems.*

This means that new buildings and alterations to existing buildings within the central city area outlined in Clause (f) above have the option of using alternative methods to mitigate flood risk, including resilient building design that either protects buildings from inundation or allows quick recovery following inundation.

The District Plan also includes a definition of “resilient building methods,” as follows:

Resilient building methods: *means methods that will, where appropriate to the building and nature of the hazard, limit damage and aid recovery from a flood event. Such methods include, but are not limited to, raising floor or foundation levels, surrounding a building with flood proof materials, sealing all openings below flood levels, elevating electrical systems, and providing flood water passage.*

The performance standards for new structures in the Riverfront and Arts and Commerce Zones reference Chapter 11 (Natural Hazards) in relation to flood hazard mitigation requirements. Objective 11.2.3 requires Riverfront development to mitigate flood hazard from the Whanganui River and Policy 11.3.7 refers to utilisation of alternative flood hazard mitigation techniques within the Arts and

Commerce and Riverfront zones. The performance standards for new structures within the Arts and Commerce zone and Riverfront Zone (11.7.1) require new buildings and additions to be designed to either:

- a. *Be protected from inundation; or*
- b. *Be able to recover efficiently following inundation.*

The One Plan and the Whanganui District Plan both acknowledge the importance of considering resilient building design methods and emergency management systems for structures in within the floodable area of the town centre and outer commercial zone. However, the design guidelines do not currently include any guidance on possible methods that could be utilised. It is recommended that consideration be given to adding a new section within both design guides that is dedicated to resilient building design. The District Plan definition can be used as a starting point when considering what methods and examples could be included.

It also may be useful to include a map of the floodable area and an advice note encouraging plan users to consult with Horizons with respect to flood depths and velocities, and finished floor level advice.

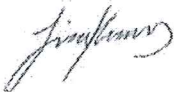
Stormwater Management in the Outer Commercial Zone

Management of stormwater is largely the responsibility of the Whanganui District Council. However, the One Plan does include one rule relating to stormwater (Rule 14-18). Within commercial areas, Horizons is primarily concerned with ensuring that stormwater discharges do not cause or exacerbate flooding of any other property (Condition (b) of Rule 14-18).

Horizons supports CP5 and CP6 in section 5.0 (Car Parking) of the Draft Wanganui Outer Commercial Building Design Guidelines, namely the suggestion to use planting areas and permeable paving to reduce stormwater run-off from car-parking areas. These measures will help to minimise localised flooding from stormwater run-off.

Please feel free to contact me (email Lisa.Thomas@horizons.govt.nz) if you wish to discuss any of the matters raised in this letter.

Yours sincerely



Lisa Thomas

COORDINATOR DISTRICT ADVICE