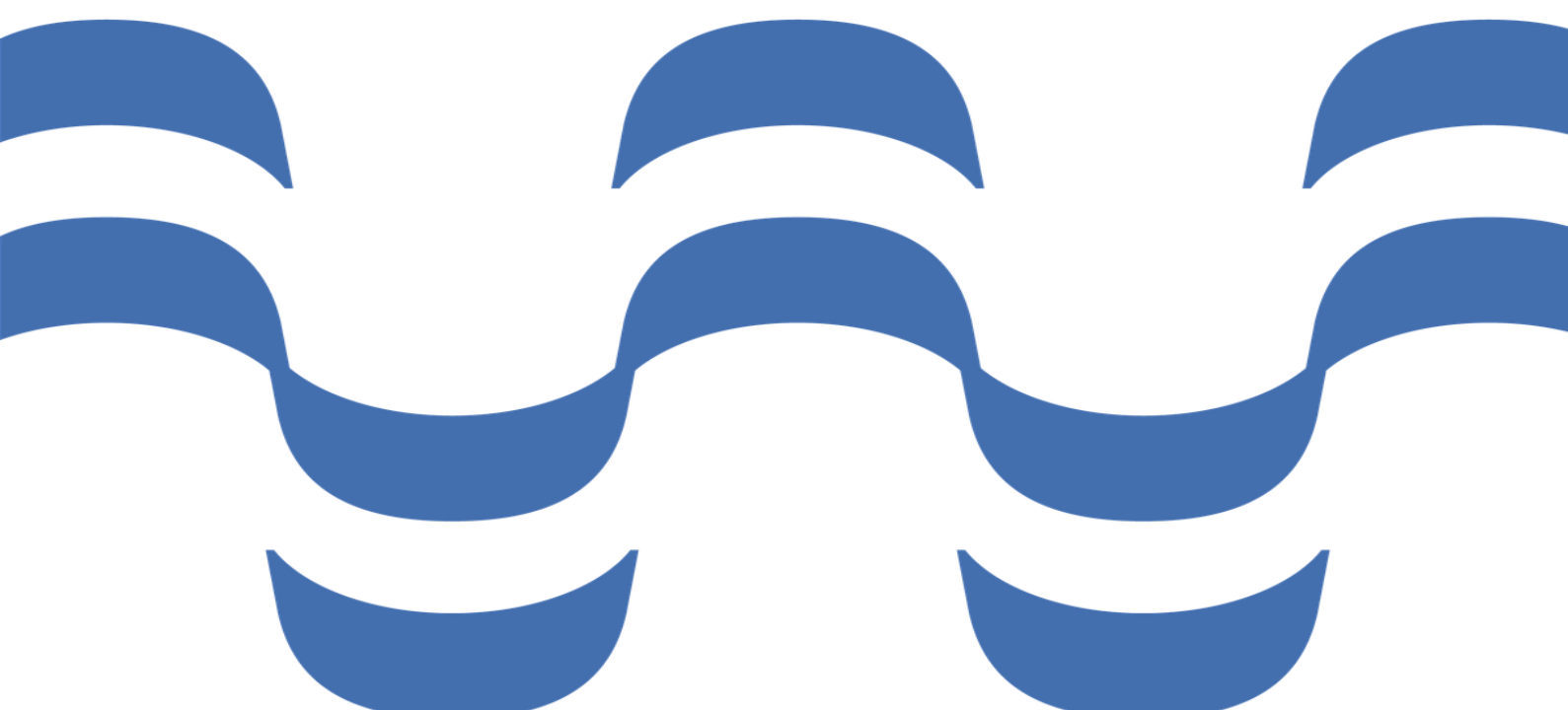




Section 32 Report

Proposed Plan Change 66

Miscellaneous 3

Date resolved: 06 August 2026

TE KAUNIHERA Ā-ROHE O
Whanganui
DISTRICT COUNCIL

Table of Contents

1.	Scope and Purpose of this Report	4
2.	Statutory Context	5
2.1	Resource Management Act.....	5
2.1.1	Plan Stop.....	5
2.1.2	Purpose and Principles of the RMA.....	6
2.2	Te Awa Tupua (Whanganui River Claims Settlement) Act.....	7
2.3	Other Relevant Legislation	7
2.4	National Instruments	7
2.4.1	National Policy Statement on Urban Development 2020	7
2.4.2	National Policy Statement for Infrastructure 2025	7
2.5	Horizons Regional Council Provisions.....	7
2.6	Other Plans and Strategies.....	8
2.6.1	Whanganui Urban Transportation Strategy.....	8
2.6.2	Regeneration Strategy for the Whanganui Town Centre.....	8
2.6.3	Ngaa Rauru Kiitahi – Puutaiao Management Plan.....	8
3.	The Issues	8
4.	Description of the Proposed Plan change	9
4.1	Background	9
5.	TRAN - Transport.....	11
5.1.	Section 32 Considerations	11
5.2.	Development of Options.....	11
6.	EW - Earthworks	14
6.1	Section 32 Considerations	14
6.2	Development of options	14
6.3	Preferred option	14
7	Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.....	17
7.1	Section 32 Considerations	17
7.2	Development of options	17

7.3	Preferred Option.....	17
8	Appendix I – WDC Engineering Document NZS4404	20
8.1	Section 32 Considerations	20
8.2	Development of options	20
8.3	Preferred Option.....	20
9	Designations.....	23
9.1	Section 32 Considerations	24
9.2	Development of options	24
9.3	Preferred Option.....	24
10	Appendix G – Design Guidelines.....	29
10.1	Section 32 Considerations	29
10.2	Development of options	29
10.3	Preferred Option.....	29
11	Consultation	31
11.1	Iwi Authorities.....	31
11.2	Developers	32
11.3	Others.....	32

1. Scope and Purpose of this Report

This report is prepared by Whanganui District Council (Council) to fulfil the statutory requirements of section 32 of the Resource Management Act 1991 (the Act; RMA) for the proposed Plan Change 66 – Miscellaneous 3 to the Whanganui District Plan (the Plan).

The report outlines the purpose, scope, statutory context, proposed amendments to the issues and an evaluation of the proposed amendments in accordance with section 32 requirements of the Act.

The purpose of this plan change is to give effect to the plan stop exemption requirements under section 80V and 80W of the Act and to directly respond to the efficiency and effectiveness of the Whanganui District Plan (the Plan). It is not intended to undertake a substantive review of the Plan provisions, rather it is limited in scope and focused on addressing matters necessary to meet the requirements of the plan stop exemption.

The proposed plan change seeks to reduce unnecessary regulatory burdens for developers, amend plan provisions that are outdated and no longer fit for purpose, and rectify any issues that are unworkable.

The scope of the plan change is:

- Removal of the requirement of NZ firefighting water supplies Code of Practice 2008 (SNZ PAS 4509:2008) from the District Plan and rely on Building Code for fire safety regulation.
- Making earthworks associated with the erection of retaining walls, under the supervision of an engineer, a permitted activity.
- Updates to transport designations and reapplication for a lapsed designation.
- Removal of Engineering Standards from the District Plan and create a standalone document.
- Updates to the Transport chapter to better align with NZ Transport Agency Waka Kotahi (NZTA) standards and remove inconsistencies from the provisions to achieve the policy direction of the National Policy Statement – Urban Development (NPS-UD).
- Updates to the Town Centre Design Guidelines to reflect the current planning system.

s32 Requirements for preparing and publishing evaluation reports

The Council is required to undertake an evaluation of the proposed Plan Change before public notification. This duty is conferred by Section 32 of the Resource Management Act 1991 (the Act). Under this section:

- (1) An evaluation report required under this Act must—
- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and
 - (b) examine whether the provisions in the proposal 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 that are anticipated from the implementation of the proposal.
- (2) An assessment under subsection (1)(b)(ii) must—
- (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.

The evaluation report must be available for public inspection at the time the proposed Plan Change is publicly notified. This report is Whanganui District Council's response to this statutory requirement.

2. Statutory Context

2.1 Resource Management Act

2.1.1 Plan Stop

In mid-2025, the Resource Management (Consenting and Other System Changes) Amendment Act 2025 brought changes in the plan making directions to pause the review of district plans (referred to as plan stop). All plan reviews under the Act were put on hold except for those automatically exempt or granted exemption through an

application to the Minister.

An exemption application was submitted by the council on 11 December 2025, and the application was granted on 5 February 2026. The exemption decision made pursuant to the criteria under s80W(2)(a), s80W(2)(b) and s80W(2)(h) of the Act, and approved to proceed in full.

2.1.2 Purpose and Principles of the RMA

The purpose of the RMA is to promote sustainable management of natural and physical resources. 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 well-being 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 and mitigating any adverse effects of activities on the environment.*

Section 6 of the Act includes eight matters of national importance which need to be recognized and provided for. Section 7 of the Act requires particular regard to be given to a range of other matters, including:

- (f) maintenance and enhancement of the quality of the environment*

Section 8 of the Act requires the principles of the Treaty of Waitangi to be taken into account.

In addition to the above sections, in preparing a Plan Change the Council is also obliged to satisfy a number of further requirements set out in the act, including:

- Section 32 - Duty to consider alternatives, assess benefits and costs
- Section 72 - Purpose of district plans
- Section 73 - Preparation and change of district plans
- Section 74 - Matters to be considered by territorial authorities
- Section 75 - Contents of district plans
- Section 80Y- Duty on local authorities to give public notice

2.2 Te Awa Tupua (Whanganui River Claims Settlement) Act 2017

Section 15 of the Te Awa Tupua Act requires Council to recognise and provide for the legal status and associated values (Tupua te Kawa) of Te Awa Tupua in exercising or performing any function, power, or duty under the Resource Management Act 1991 that relates to:

- the Whanganui River; or
- an activity within the Whanganui River catchment that affects the Whanganui River

In undertaking these responsibilities Te Pā Auroa (the Te Awa Tupua framework set out in Part 2) is a relevant consideration (section 11), with the Council required to outline how it has fulfilled its obligations under this framework in relation to any associated decision, document or report prepared (section 15).

2.3 Other Relevant Legislation

Other relevant legislation which impacts on aspects of this plan change is:

- Local Government Act 2002
- Land Drainage Act 1908
- Building Act 2004

2.4 National Instruments

Section 75(3) of the RMA requires all district plans to give effect to any relevant national policy statements or national environmental standards. A national policy statement sets a national direction whereas a national environment standard sets specific minimum environmental standards to be enforced by consent authorities. There are eleven National Environmental Standards and ten National Policy Statements currently in force, all of which have been considered while preparing this report.

2.4.1 National Policy Statement on Urban Development 2020

PC66 includes a minor amendment that gives effect to the NPS-UD. The plan change removes provisions relating to minimum car parking requirements, thereby resolving inconsistencies with Subpart 8 (car parking requirements) of the NPS-UD.

2.4.2 National Policy Statement for Infrastructure 2025

PC66 gives effect to the NPS-I by recognizing the role and function of transport infrastructure through the District Plan's transport provisions.

2.5 Horizons Regional Council Provisions

Section 75 (3) of the act requires that a District Plan must "give effect to" the Regional Policy Statement, and it must "not be inconsistent" with any Regional Plan (75(4)). The Manawatu-Whanganui Regional Council's (Horizons) "One Plan" is a trading name for both its Regional Policy Statement and Regional Plan.

The Operative District Plan gives effect to the Regional Policy Statement and the Regional Plan Sections of the One Plan, and this miscellaneous plan change will not significantly alter that assessment.

2.6 Other Plans and Strategies

When preparing or changing a district plan, under section 74(2)(b), a territorial authority shall have regard to any management plans and strategies prepared under other Acts.

When preparing or changing a district plan, Section 74(2A) of the Act requires planning authorities to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district.

2.6.1 Whanganui Urban Transportation Strategy

The transport strategy has been considered while preparing for this plan change.

2.6.2 Regeneration Strategy for the Whanganui Town Centre

The strategy has been considered when amending provisions in the Town Centre Guidelines, even though the amendments are solely corrections to reflect current planning system.

2.6.3 Ngaa Rauru Kiitahi – Puutaiao Management Plan

When preparing or changing a district plan, section 74(2A)(a) of the Act requires planning authorities to take into account any relevant planning document recognised by an iwi authority and lodged with the territorial authority, to the extent that its content has a bearing on the resource management issues of the district. The Ngaa Rauru Kiitahi – Puutaiao Management Plan has been prepared and lodged by Te Kaahui o Rauru. The plan seeks to protect and preserve the spiritual, cultural and historic connection of the iwi to the environment and identifies that this iwi wishes to be engaged in the preparation, implementation and review of the changes to the local plan.

3. The Issues

Since the implementation of the 'plan stop', issues able to be addressed though the plan change are limited to matters that fall within the scope of the approved plan stop exemption. The issues identified in this plan change are ongoing efficiency and effectiveness review which includes outdated and unclear provisions, unnecessary regulatory barriers, and those that are not consistent with the intent and outcome of the objectives, rather than enabling substantive review of zoning or other significant changes to development capacity.

The scope of issues is subject to the Plan Stop exemption criteria under section 80W of the act. The specific issues include:

- Inconsistencies between NZTA standards and Transport standards within the plan
- Requirement of resource consent for backfilling of retaining walls when it is over 0.6m height.
- Requirement of New Zealand Firefighting water supplies code of practice 2008 (SNZ PAS 4509:2008) standards within in the plan increases the financial and regulatory burden developments.
- The District Plan's inclusion of Engineering Standards makes it unworkable to update under the RMA 1991.
- Transport designations within the plan are outdated and lapsed requiring an update.
- Town Centre Design Guidelines does not reflect the current planning system resulting in unintended urban design outcomes.

Collectively, these issues resulted in plan user uncertainties, inconsistencies, and additional time and cost associated with consenting process. Addressing these issues is necessary to keep balance between the need for a fit for purpose during transitional district plan and implementing RMA reform.

4. Description of the Proposed Plan change

This Plan Change comprises several amendments to the District Plan. The purpose of this plan change is to rectify issues that create unnecessary regulatory burdens, remove inconsistencies with the national documents, remove planning barriers that may lead to unintended outcomes and update provisions that enhance clarity and effectiveness of the District Plan. The proposed plan change ensures that the District Plan remains efficient and effective while we prepare for transitioning into the new RMA reform system.

Proposed changes include amendments to definitions, rules and standards, particularly within TRANS - Transport, EW – Earthworks, SUB – Subdivision, GIZ- General Industrial Zone and consequential amendments to rules and standards within other relevant chapters. Appendix G includes amendments to design guides, and the Appendix I is removed from the district plan with its consequential amendments to relevant chapters.

4.1 Background

The background work for plan change 66 began in early 2025 to update existing plan provisions that are no longer fit for purpose and are challenging to deliver good quality development outcomes in the district.

An initial list of issues was identified through the consenting and monitoring

processes. This was followed by early engagement with developers (which was undertaken prior to the Plan Stop announcement) to seek feedback and potential recommendations on these issues.

The issues identified through both internal processes and stakeholder engagement informed the scope and content of the plan change.

The introduction of Plan Stop in late 2025 mandated the requirement for Councils to stop all plan changes except automatically exempted or the exempt is granted by the minister. The plan stop exemption was limited to matters that could be considered by the minister.

Section 80W (2) outlines the list of criteria for an exemption that would –

- (a) better enable the local authority to provide, operate, or maintain municipal drinking water, stormwater, or wastewater in accordance with the Water Services Act 2021:
- (b) rectify any provisions in a plan or policy statement that have had unintended consequences, are unworkable, or have led to inefficient outcomes:
- (c) respond to changes made to this Act:
- (d) better enable climate change to be managed:
- (e) support the transition of high-risk land so as to better manage the risk of erosion:
- (f) better enable any relevant Treaty of Waitangi settlement Act or deed of settlement, and the Crown's obligations under that settlement, to be upheld:
- (g) enable a response to be made to a recommendation from the Environment Court:
- (h) enable work to be progressed that, for any other reason, the Minister considers appropriate.

Of all the issues identified earlier in 2025, only those that fell within the criteria were applied for and granted an exemption.

On 5 February 2026 the Minister responsible for RMA Reform approved the plan stop exemption application for Proposed Plan Change 66 – Miscellaneous 3. This plan change is now proceeding in accordance with the exemption application approval.

5. TRAN - Transport

Proposed PC66 amends the definition for vehicle crossing to give effect to the National Policy Statement – Urban Design (NPS-UD). Policy 11 and clause 3.38 of the NPS-UD require tier 1, 2 and 3 territorial authorities to remove minimum car parking rate requirements, other than for accessible car parks. As a tier 3 territorial authority, Whanganui District Council is required to give effect to these provisions. While minimum parking requirements have largely been removed from the district plan, the current definition and associated standards for vehicle crossings may, in some circumstances, indirectly require the provision of on-site parking for residential development. This outcome is inconsistent with the intent of the NPS-UD and the national direction to remove parking requirements.

Proposed PC66 also addresses several provisions that are inconsistent with the corresponding ePlan map. In particular, the terminology used to determine the transport routes are not consistently applied between the district plan provisions and the route identified with the ePlan map. Therefore, the plan change will address these inconsistencies, resulting in greater clarity and consistency for plan users when interpreting and applying the rules.

5.1. Section 32 Considerations

The table below provides an analysis of the costs and benefits of the proposed amendments. This analysis enables an assessment of the efficiency, effectiveness and appropriateness of the proposed Plan Change. The plan change updates the transport rules without altering the objectives and policies.

5.2. Development of Options

In the preparation of PC66 the following options have been identified:

Option 1 – do nothing/retain the status quo.

Option 2 – full update to all the transport standards as per NZTA design standards and One Road classification for classifying routes.

Option 3 – partial update to transport standards that are currently not fit for purpose.

Preferred option

The preferred option is Option 3 – a Partial update to transport standards that are currently not fit for purpose.

Table 1: Summary of Analysis

Options	Efficiency and effectiveness of provisions in achieving the objectives	Benefits	Costs
Option 1 – Do nothing/retain status quo	Not the most effective or efficient means of achieving the transport objectives. While the provisions can continue to manage established transport effects, they are unlikely to fully achieve the objectives over long-term.	• Environmental benefits - Continued reliance of the effects management approach rather than proactive network planning. • Economic benefits - No additional cost for undertaking plan change process. • Social benefits - No risk of unintended regulatory consequences from new provisions.	• Environmental Cost - Missed opportunities to improve transport provisions through more targeted and consistent approach. Potential inefficiencies may develop as the corresponding NZTA standards update in future. • Non-compliance with the NPS-UD. • Economic cost – None identified • Social cost – none identified
Option 2 – Full Update to Transport Standards	The overall effectiveness of the full update of transport provisions will be high however in the context of miscellaneous PC, efficiency is low given the remaining life of current RMA system.	• Environmental benefits - Fully aligned with NZTA standards and internally consistent. • Economic benefits – Aligns with future development of combined	• Environmental cost – none identified • Economic cost - Comprehensive redrafting of objectives, policies, rules and standards. Cost

		engineering standards. • Social benefits – none identified	associated with seeking expert advice. Wasted effort and time Risk of redundancy under the new RMA system. • Social cost – high. Suboptimal social outcomes may arise if the plan is not interpreted correctly.
Option 3 – Partial Update to Transport Standards (Preferred)	The option is more efficient and fit for purpose in achieving the objective. It is more efficient than undertaking a full chapter review due to time constraints and scope of the plan change, which is being progressed under a plan stop exemption. The plan change is able to specifically focus on updating those provisions that are outdated and do not achieve internal consistency within district plan and national standards.	• Environmental benefits – Reduced risk of inappropriate development results resulting from inconsistent application of transport standards. • Economic benefits – improved efficiency for consent planners through clearer road classifications and associated rules, reducing the time required to determine which provisions apply. • Social benefits – improved certainty and clarity for plan users.	Environmental Cost – none identified Economic Cost – lesser cost to complete the review of the provisions compared to option 2 Social cost – low.

6. EW - Earthworks

Under the Earthworks Standard (EW-S1), the rule interpretation with text does not fully reflect the intent of the illustration in EW-S1 standard diagram. As a result, planners end up applying a blended interpretation of Earthworks standard 1 and Earthworks standard 2 when assessing retaining walls.

Currently, the EW-S1 text permits the construction of retaining walls with a maximum height of 1.5m, measured vertically from ground level. However, the EW-S1 diagram illustrates additional control, backfilling up to 1.5m, no surcharge, and that cuts shall not occur on slopes exceeding 20°, which is currently not reflected in the EW-S1 text.

The Earthworks Standard (EW-S2) specifically sets requirements for permitted land disturbance during the formation of building platforms. The provision for cutting and fill under this standard have created confusion and have been incorrectly applied for the assessing the retaining walls, due to the absence of corresponding cut and fill requirements in the EW-S1 text.

The proposed PC66 will update the text for the Earthworks Standard 1 to improve consistency and clarity for permitted retaining walls.

6.1 Section 32 Considerations

The table below provides an analysis of the costs and benefits of the proposed amendments.

This analysis enables an assessment of the efficiency, effectiveness and appropriateness of the proposed Plan Change. The plan change does not alter the objectives and policies of the earthworks provisions.

6.2 Development of options

In the preparation of PC66 the following options have been identified:

Option 1 – do nothing/retain the status quo.

Option 2 – amend the rule text to achieve the consistency between EW-S1 text and corresponding diagram.

Option 3 (non-regulatory) – prepare a practice note to assist planners with guidance for interpreting retaining wall provisions during assessment.

6.3 Preferred option

The preferred option is Option 2 – amend the rule text to achieve the consistency between EW-S1 text and diagram.

Table 2: Summary of Analysis

Options	Efficiency and effectiveness of provisions in achieving the objectives	Benefits	Costs
Option 1 – Do nothing/retain status quo	The efficiency and effectiveness of objective is not achieved if the plan is interpreted incorrectly. Retaining the existing rules will continue to lead to inconsistent decision-making	• Environmental benefits – none identified • Economic benefits – no cost to carry out plan change • Social benefits – none identified	• Environmental Cost – none identified • Economic Cost – increased time and resources spend on resolving issues rather than assessing, potential regulatory risk may discourage development. Potential for legal dispute. • Social cost – reduced certainty for plan users, negative impact on council-public relationship
Option 2 – amend the rule text to achieve the consistency between EW-S1 text and corresponding	Efficiency and effectiveness of objective will be achieved if the rule is amended to reflect the intent of the provision. The update to the Earthworks provisions will ensure consistent application of the rules by planners	• Environmental benefits – no risk of unintended environmental outcomes • Economic benefits – no vulnerability to legal dispute • Social benefits – improved	• Environmental Cost – no cost identified • Economic Cost – cost associated with processing a plan change. • Social cost – no social cost

diagram (Preferred)	as well as the other plan users.	certainty and clarity for plan users	identified.
Option 3 (Non-regulatory) – Prepare a practice note for Planners to guide with interpreting retaining wall rules.	Efficiency and effectiveness may be partially achieved through planners' interpretation of the provisions; however, this approach does not provide the same level of clarity for all plan users.	• Environmental benefits – no risk of unintended environmental outcomes • Economic benefits – no cost associated with plan change. • Social benefits – immediate and improved consistency with the interpretation of the rule.	• Environmental Cost – Practice note does not have legal status for enforcing the rule consistency. The practice will not only improve consistent application of rules internally. • Economic Cost – lesser time and no cost associated with preparing the practice note. • Social cost – no cost

7 Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008

Plan Change 54 added the SNZ PAS 4509:2008 standard for firefighting water supply into the District Plan. The inclusion of this standard has resulted in unintended consequences for developers, as the standard must be complied with. The options available to achieve compliance with the standards are financially unviable for developers, leading to delays in project developments.

A firefighting engineering study was conducted to review the efficiency and effectiveness of the PAS 4509:2008 in the district plan. The outcome of the study recommends the removal of the standard from the district plan given the PAS 4509 is a non-mandatory code of practice that primarily addresses property protection rather than life safety outcomes and may bring costs to development that are disproportionate to its benefits. Incident response data from Fire and Emergency New Zealand was obtained through an Official Information request to inform the study and decision-making.

The proposed plan change 66 will remove the requirement of this standard and enable voluntary use of this standard on the basis of developer's decisions and risk appetite.

7.1 Section 32 Considerations

The table below provides an analysis of the costs and benefits of the proposed amendments.

This analysis enables an assessment of the efficiency, effectiveness and appropriateness of the proposed Plan Change. The amendments to this plan change include changes to the policies and rules.

7.2 Development of options

In the preparation of PC66 the following options have been identified:

Option 1 – do nothing/retain the status quo.

Option 2 – Remove the firefighting water supplies requirement from all zones in the plan.

7.3 Preferred Option

The preferred option is Option 2 – remove the firefighting water supplies requirement from all the zones in the district plan.

All the options considered are Regulatory methods.

Table 3: Summary of Analysis

Options	Efficiency and effectiveness of provisions in achieving the objectives	Benefits	Costs
Option 1 – Do nothing/retain status quo	Does not achieve the intended outcomes of the objectives in the plan. The standard may deem obsolete, and which will continue to reference to the older standards.	• Environmental benefits – continue to align with existing subdivision and development expectations. • Economic benefits – no additional plan change cost. • Social benefit – none identified	• Environmental cost – none identified. • Economic cost – none identified • Social cost – developers are strictly required to comply with the standards which makes it financial unviable. Reduced delivery of development opportunities.
Option 2 – Remove firefighting water supplies standards from all zones (Preferred)	Removing the firefighting standard from the district plan is the most appropriate way to achieve the desired outcome for the plan's efficiency and effectiveness. Removing the firefighting standards from district plan would remove unnecessary duplication,	• Environmental benefits – none identified • Economic benefits – simplifies consenting process, reduces time delays. • Social benefits – reduces barriers to development and supports the economic	Environmental cost – none identified. Economic Cost – cost to process plan change and seek expert advice to support the decision-making. Social Cost – reduced community resilience to fire emergencies, inequitable outcomes

	provide greater clarity between regulatory planning and building code requirements, and streamline consent processes.	development in the district.	
--	---	------------------------------	--

8 Appendix I – WDC Engineering Document NZS4404

The District Plan, which became operative in February 2017, incorporates the Engineering Document 2016 and NZS4404 through direct reference. This document is now nearing the point where a review is required particularly considering changes associated with the transition to the joint water services entities.

As Engineering Standards are directly referenced in the district plan and any update would need to be undertaken through a full Schedule 1 process under the Act. Due to insufficient time available to complete it within the current RMA transition period, it is more efficient for the Engineering Standard to be removed from the district plan and instead managed as a standalone document under Local Government Act 2002, where it can be updated and maintained.

The intent of this plan change is to remove the reference of Appendix I (Engineering Standards) from the district plan and make it a standalone document, without altering the technical provisions of the Engineering Standards. The Engineering Standards will continue to be applied for relevant infrastructure design, construction and maintenance purposes.

While the Engineering standards will no longer be directly incorporated within the district plan rules, they will continue to be implemented through the matters of control and matters of discretion. This approach enables Council to have regard to and require compliance with the current Engineering Standards when assessing consents.

The Whanganui District Council Land Development and Subdivision Engineering document 2016 is available on the Whanganui District Council website under [Information for Property Development](#).

8.1 Section 32 Considerations

The table below provides an analysis of the costs and benefits of the proposed amendments. This analysis enables an assessment of the efficiency, effectiveness and appropriateness of the proposed Plan Change.

8.2 Development of options

In the preparation of PC66 the following options have been identified:

Option 1 – do nothing/retain the status quo.

Option 2 – Remove the Engineering Standards from the District Plan and make it a standalone document.

8.3 Preferred Option

The preferred option is Option 2 – Remove the Engineering Standards from the District Plan and make it a standalone document.

Table 4: Summary of Analysis

Options	Efficiency and effectiveness of provisions in achieving the objectives	Benefits	Costs
Option 1 – Do nothing/retain status quo	Does not achieve the efficacy of the objectives in the plan as the standards become outdated and lot of time delays are associated with updating the engineering standards in the plan to reflect changes in practice.	• Environmental benefits – enforceable protection of natural systems through consistent infrastructure quality across developments. • Economic Benefits – statutory certainty for developers • Social benefits- none identified	• Environmental cost – risk of standards becoming outdated relative to industry practice. • Economic cost – high plan change cost to update engineering standards within the plan. A full plan change under RMA 1991 will not be able to keep pace with implementation timeframe. • Social cost – none identified
Option 2 – Remove the Engineering Standard from the Plan (Preferred)	Achieves the efficiency and effectiveness of the subdivision and transport objectives through updating the standards timely and delivering quality developments.	• Environmental benefits - timely response to the changing environmental conditions. Faster updates and better alignment with industry practice. • Economic benefits – low	• Environmental cost – engineering solutions may become technically compliant but environmentally suboptimal.

		administrative and plan change associated cost. • Social Benefits – long-term improved infrastructure outcome for public safety and wellbeing.	• Economic cost – working • Social cost – less say for public in public associated infrastructure designs
--	--	---	--

9 Designations

Designation is the formal process for the requirement of land for public work (such as a road or telecommunications facility, school or prison). It is the equivalent of a land use consent application for a public project or work of a network utility.

Plan Change 66 seeks to review existing transport designations within the Whanganui District Plan to ensure they remain current, are efficiently administered, and accurately reflect the requiring authorities' intentions. In particular, the review responds to requests from NZ Transport Agency Waka Kotahi (NZTA) to review State Highway designations, and the need for Whanganui District Council (WDC) to address outdated or lapsed designations, and to provide for new roading requirements.

The District Plan currently includes a number of designations for transport infrastructure held by both NZTA (for State Highways 3 and 4) and WDC (for local road purposes). Over time, some designations have become partially implemented, lapsed, or no longer reflect current infrastructure planning and management practices. In addition, the statutory framework under the Resource Management Act 1991 requires the Requiring Authorities to either give effect to their designations or allow them to lapse after five years unless given effect to or extended.

Whanganui District Council Lapsed Designations

There are 86 Whanganui District Council designations showing on the operative District Plan, of which 33 lapsed in 2019. These are showing in the Plan as 'not yet implemented'

The Transportation Manager and Whanganui Alliance Performance Manager reviewed the lapsed designations to identify which were not budgeted for in the Long-Term Plan or Asset Management Plan and therefore would not need to have a further application for a Notice of Requirement.

It is proposed to remove lapsed designations from the District Plan where the prescribed lapse period has expired and no extension has been sought or works given effect to.

A Notice of Requirement (NoR) for a new or updated roading designation to ensure appropriate statutory protection for planned road infrastructure has been initiated. This NoR will be processed in accordance with section 168A and clause 4(6) of the First Schedule of the Resource Management Act 1991.

Designations relating to the following purposes will be completely removed from the District Plan text and maps:

- Service land extension (St Hill Street)
- Proposed service land (Wicksteed Street)
- Road widening (Cnr Victoria Avenue and Dublin Street)
- Road widening (St Hill Street)

- Road widening (Cnr Wilson and Ingestre Streets)
- Road widening (Mosston Road)
- Proposed service land (Churton Street)
- Road widening (Heads Road, Guyton Street to Liffiton Street)
- Proposed road (land between either end of Nathan Street)

Details of these deleted designations are shown in the Marked-Up text appendix.

NZTA Designations (State Highways 3 and 4)

NZTA has requested that the existing designations for State Highway 3 and 4 be rolled over into the updated District Plan. The rollover will include amendments to update designation mapping for accuracy and ensure consistency with statutory and policy frameworks.

9.1 Section 32 Considerations

The table below provides an analysis of the costs and benefits of the proposed amendments.

This analysis enables an assessment of the efficiency, effectiveness and appropriateness of the proposed Plan Change. Instead of assessing all cases individually, a cost/benefit and appropriateness assessment has generally been undertaken for each subject group.

9.2 Development of options

In the preparation of PC66 the following options have been identified:

Option 1 – do nothing/retain the status quo.

Option 2 – Update the designations that are lapsed and outdated through plan change process

Option 3 - Update designations through – notice of requirement under Resource Consent Process

9.3 Preferred Option

The preferred option is Option 2 – Update the designations that are lapsed and outdated through plan change process.

The proposed amendments to transport designations are considered the most appropriate way to achieve the purpose of the RMA. They ensure that the District Plan accurately reflects current and future transport infrastructure requirements, while improving plan efficiency and providing certainty for both requiring authorities and the community.

Table 5: Summary of Analysis

Options	Efficiency and effectiveness of provisions in achieving the objectives	Benefits	Costs
Option 1 – Do nothing/retain status quo	• Outdated or inaccurate designations may persist, reducing plan integrity and creating implementation issues; • Lapsed designations may continue to appear operative, causing confusion and potential inefficiencies; • Future roading projects may lack statutory protection, increasing uncertainty and potential delays.	• Economic benefits - ○ No immediate costs associated with GIS correction or plan drafting. ○ Administrative simplicity in the short-term. ○ Reduces the risk of challenge through submissions and appeals. • Social benefits – none identified. • Environmental benefits – None identified.	• Economic cost - ○ Ongoing administration costs with staff time dealing with designation inconsistencies, interpretation issues and section 176 approvals. ○ May require a more complex and costly future plan change. ○ Reduced efficiency for development with uncertainty about designation boundaries and potential delays due to clarification. • Social cost - Potential for inconsistent decision-making and ambiguity in consenting decisions.

			• Environmental cost – Poor infrastructure protection.
Option 2 – Update the designations through plan change process (Preferred)	The rollover of the NZTA designations with amendments is an efficient method of maintaining existing operational corridors while ensuring provisions are up to date. It avoids the needs for entirely new designation processes while still achieving improved clarity and functionality. Removing lapsed designations improves the efficiency of the District Plan by eliminating redundant provisions that may otherwise create uncertainty for landowners and plan users. It ensures the Plan reflects only those designations that have legal effect. The use of Notices of Requirement for new WDC roading designations is the most effective statutory mechanism to secure land and provide for future transport infrastructure. This approach ensures robust assessment,	• Economic benefits – ○ Improved accuracy and usability of the District Plan; ○ Enabling of future roading infrastructure through appropriately tested NoRs. • Social benefits – Greater certainty for landowners and infrastructure providers; • Environmental benefits – ○ Removal of unnecessary planning constraints associated with lapsed designations; ○ Continued protection of critical State Highway corridors;	• Economic Cost – ○ Administrative costs associated with updating and processing designation changes; ○ Resource costs associated with NoR processes. • Social cost – Potential impacts on affected landowners where new or amended designations apply; • Environmental cost – none identified.

	including consideration of environmental effects, alternatives, and consultation.		
Option 3 – Update designations through notice of requirement under Resource Consent Process	Using individual Notices of Requirement to update existing designations would be less efficient than incorporating the changes through a district plan review process where the changes are largely administrative in nature (eg. Rollovers, removal of lapsed designations). For NZTA, requiring new NoRs to replace existing State Highway designations would duplicate assessment processes for infrastructure that is already established and operational. The rollover (with amendments) approach is more efficient as it retains the existing legal effect while enabling targeted updates. For WDC, the removal of lapsed designations cannot be achieved through a NoR process and is more efficiently addressed through a plan change. Similarly, minor	• Economic Benefit - Provides a robust, project-specific assessment framework, including alternatives analysis and detailed effects assessment. • Social benefit - Enables direct engagement with affected parties on specific infrastructure proposals; • Procedural benefit - Ensures strong statutory weight and clarity for new or significantly altered designations.	• Economic cost – ○ Higher administrative and procedural costs, including preparation of assessment of environmental effects (AEE), hearings, and potential appeal costs; ○ Longer timeframes compared to plan change amendments for largely administrative updates; ○ Duplication of effort where designations are already in place and functioning; • Social cost - Potential uncertainty for requiring authorities and landowners during the process. • Environmental Cost- none identified.

	corrections or administrative updates are more effectively achieved through the plan review process rather than initiating multiple NoR procedures. However, for new or substantially changed roading designations, the NoR process is the most effective method, as it ensures a comprehensive assessment of environmental effects, alternatives and consultation in accordance with Part 8 of the RMA. This aligns with WDC's approach of initiating a NoR for a new roading designation.		
--	---	--	--

10 Appendix G – Design Guidelines

The proposed plan change updates outdated design guideline references to align with the current plan structure and removes the mandatory requirement for Urban Design Panel involvement, making it an optional process.

The Town Centre Design Guidelines and Outer Commercial Design Guidelines currently reference chapter numbers and provisions that exist prior to the implementation of the National Planning Standards (NPS). The NPS implementation restructured the numbering of plan provisions, while Appendix G remained unchanged. As a result, the design guides are now outdated in the current planning system.

Additionally, Appendix G triggers mandatory involvement of the Urban Design Panel for a range of activities under COMZ-P21. While this requirement is mandatory within the plan's provisions, the Urban Design Panel is not fully established and is applied inconsistently in practice. COMZ-P21 will therefore be amended to change the wording from mandatory requirement to an optional approach.

10.1 Section 32 Considerations

The table below provides an analysis of the costs and benefits of the proposed amendments. This analysis enables an assessment of the efficiency, effectiveness and appropriateness of the proposed Plan Change.

10.2 Development of options

In the preparation of PC66 the following options have been identified:

Option 1 – do nothing/retain the status quo.

Option 2 – update the Town Centre Design Guide document.

10.3 Preferred Option

The preferred option is Option 2 – update the Town Centre Design Guide document.

Table 6: Summary of Analysis

Options	Efficiency and effectiveness of provisions in achieving the objectives	Benefits	Costs
Option 1 – Do nothing/retain status quo	Efficiency and effectiveness of achieving the plan objectives will be reduced due to inconsistent and unclear interpretation of plan and rules and design guideline intent.	• Environmental benefits – none identified • Economic Benefits – no cost associated with reviewing the design guide document • Social benefits- none identified	• Environmental costs – None identified. • Economic costs – no cost to carry out plan change process. • Social costs – None identified.
Option 2 – update the Town Centre Design Guide document (preferred)	Updated design guidelines will reflect the efficiency and effectiveness of the plan objectives and achieve high-quality design outcomes.	• Environmental benefits – consistent and high-quality design outcomes for Town Centre and Outer Commercial Zones • Economic Benefits – increasing certainty reduces processing time delays, and compliance cost • Social benefits- improved clarity for building owners. Fair decision making.	• Environmental costs – None identified. • Economic costs – cost to review the design guide through plan change process. • Social costs – None identified.

11 Consultation

11.1 Iwi Authorities

Clause 3(1)(d) of Schedule 1 of the RMA requires that during the preparation of a proposed plan, the local authority shall consult with the tangata whenua of the area who may be so affected, through iwi authorities.

In accordance with clause 3B of Schedule 1 of the Act, for the purposes of clause 3(1)(d), a local authority is to be treated as having consulted with iwi authorities in relation to those whose details are entered in the record kept under section 35A, if the local authority –

- (a) considers ways in which it may foster the development of their capacity to respond to an invitation to consult; and
- (b) establishes and maintains processes to provide opportunities for those iwi authorities to consult it; and
- (c) consults with those iwi authorities; and
- (d) enables those iwi authorities to identify resource management issues of concern to them; and
- (e) indicates how those issues have been or are to be addressed.

Under Clause 4A of Schedule 1 of the Act, planning authorities are required to:-

- provide a copy of any draft policy statement or plan to any iwi authority previously consulted under clause 3 of Schedule 1 prior to notification;
- allow adequate time and opportunity for those iwi authorities to consider the draft and to supply advice; and
- have particular regard to any advice received before notifying the plan.
- as an extension of this, s32(4A) requires evaluation reports prepared in relation to proposed policy statements and / or plans to include summaries of:
- all advice received from iwi authorities concerning the proposal; and
- the response to that advice, including any proposed provisions intended to give effect to the advice.

Pre-notification consultation on the proposed Plan Change has been undertaken with Council's tangata whenua partners, with no further major issues or objections raised. These partners are:

- Nga Tangata Tiaki o Whanganui;

- Te Rūnanga o Tupoho;
- Te Rūnanga o Tamaupoko;
- Ngaa Rauru Kiitahi;
- Te Rūnanga o Ngā Wairiki Ngāti Apa.

11.2 Developers

As part of the pre-consultation and engagement process, developers were contacted and had opportunity to discuss and provide feedback on the proposal.

11.3 Others

Fire and Emergency New Zealand (FENZ), through Beca as the point of contact, was notified of the review of the efficiency and effectiveness of the firefighting standards in the district plan and invited to provide feedback during the pre-consultation stage.