

**Wanganui District Council
District Plan Review**

Section 32 Report

**Phase Two – Subdivision,
Earthworks and Infrastructure**

Documents Referred to:

<p>Legislation</p> <p>Resource Management Act 1991</p> <p>Reserves Act 1977</p> <p>Land Drainage Act 1908</p>	<p>Ministry of Health Drinking Water Standards for New Zealand 2005 (updated 2008)</p> <p>Electricity (Hazards from Trees) Regulations 2003</p>
<p>Non-statutory documents</p> <p>New Zealand Urban Design Protocol</p>	<p>Regional Documents</p> <p>Proposed Manawatu Wanganui Regional Council OnePlan</p>
<p>New Zealand Standards</p> <p>NZS 3604 2011 Timber Framed Buildings</p> <p>NZS 6803 1999 Acoustics Construction Noise</p> <p>NZECP:34 2001 New Zealand Electrical Code of Practice for Electrical Safe Distances</p> <p>SNZ PAS 4509 2008 New Zealand Fire Service Fire Fighting Supplies Code of Practice 2008</p> <p>NZS 4404 2004 Land Development and Subdivision Engineering</p> <p>NZS 4404 2010 Land Development and Subdivision Infrastructure</p> <p>National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.</p>	<p>Wanganui District Council Documents</p> <p>Wanganui District Council Ten Year Plan 2012 – 2022</p> <p>Wanganui Urban Transport Strategy</p> <p>Wanganui District Council Tree Policy 208</p> <p>Share Pathways Strategy</p> <p>Cycling Strategy</p> <p>Cycling Implementation Plan</p> <p>Wanganui District Council Land Development and Subdivision Engineering Document 2012</p> <p>Draft Otamatea Structure Plan</p>

Proposed Objectives

Infrastructure Development

O17 Infrastructure development which is coordinated, effective and efficient in the use of natural and physical resources to meet present and foreseeable future needs of the district.	
Comment	Objective 17 has only been slightly modified in that description has been removed. The Objective is still relevant in that it seeks to encourage the strategic management of infrastructure now and into the future, while balancing the needs of the natural and physical environment.
Appropriateness	As the Objective has not materially changed, no issues were raised during consultation, and that no significant adverse effects will arise, the retaining of Objective 17 is deemed appropriate.

Proposed objective	Relates to Existing Objective/s
Objective 17	Objective O1, O17

Sustainable subdivision and Infrastructure

Objective O40	<p>Sustainable subdivision and infrastructure development in the Residential areas of Wanganui that:</p> <ul style="list-style-type: none"> a. Appropriately integrates infrastructure with land uses; b. Provides a safe, healthy and livable residential environment; c. Connects infrastructure and communities together; d. Is resource and energy efficient; e. Has low environmental impact and integrates the natural environment; f. Avoids, minimises or mitigate adverse effects on historic heritage including archaeological sites.
Comment	<p>The Objective – O40, is completely new. It provides a clear direction for decision-making and reinforces that infrastructure is an important community asset. In particular, the Objective has focussed on the human aspects of infrastructure and engineering performance. This is a shift in thinking from development and infrastructure being separate, and recognises the interdependent and connected nature of the community and infrastructure.</p> <p>Letters (a) through (f) are a list of outcomes that are desired from both subdivision and infrastructure development. They represent a list of items that will ensure subdivision and infrastructure development provide for more sustainable outcomes for the environment and the community.</p> <p>In addition, in accordance with the desired outcomes of the Wanganui District Council's Family Friendly Strategy 2012-2022,</p>

	increased quality of life, or liveability is key, as is connecting infrastructure with the community.
Appropriateness	The Objective is appropriate as it is consistent with emerging practice for urban design and infrastructure, particularly with regard to low impact and flexible development. The voluntary New Zealand Standard for Subdivision and Infrastructure Development (NZS 4404: 2010), has a similar focus. While Wanganui District Council has not adopted NZS 4404: 2010, several strategies, such as the Wanganui Urban Transport Strategy 2011, have explicitly adopted these.

Proposed objective	Relates to Existing Objective/s
Objective 40	Objective O17, O41, O42

Urban Design, Subdivision and Infrastructure

O41	Subdivision and infrastructure development that demonstrates the following qualities of good urban design defined in the New Zealand Urban Design Protocol:
	<ul style="list-style-type: none"> a) Context b) Character c) Choice d) Connections e) Creativity f) Collaboration g) Crime Prevention Through Environmental Design (CPTED)
Comment	<p>The design of our towns and cities affects almost every aspect of our lives - we all live and work in buildings, and use streets, public spaces, transport systems and other infrastructure. We need to ensure that what we design meets people's needs and aspirations, and that people want to live there. The New Zealand Urban Design Protocol (the Protocol) was established as a first step towards improving the urban areas around New Zealand.</p> <p>Urban design is the name of the process that designs and promotes 'liveable' and people focused urban spaces. It is a multidisciplinary approach to getting the best quality sustainable mix of natural processes, structures, social interaction, connectedness, and people. Urban design is often referred to as 'place making'.</p> <p>The Protocol outlines the 7 C's of good urban design:</p> <p>Context: Demonstrating an understanding that subdivision, buildings, land uses, movement corridors, the natural environment and processes, and public places and spaces occur within site specific and broader</p>

	<p>Wanganui settings.</p> <p>Character: Reflecting, enhancing and protecting the distinctive natural and physical qualities within the local and broader context of Wanganui in the development proposal. This includes significant cultural and visual landscape features, the surrounding built environment, and historic heritage.</p> <p>Connections: Enhancing connectivity within multi-modal transportation networks and the links between the different transport modes (pedestrian, cycleway, street) to ensure safe and easy movement for people and the integration of the subdivision with existing and future surrounding neighbourhoods through these networks.</p> <p>Custodianship: Design that is environmentally and economically safe and accessible. Spaces that are protected as places of value by the community.</p> <p>Collaboration: Designs that acknowledge the contribution of different disciplines and perspectives, communicating and sharing knowledge for the integration of landuse, structures and networks. This includes the wider and affected communities.</p> <p>CPTED: Crime Prevention Through Environmental Design.</p> <p>The Protocol has guided a number of other documents, including the review of NZS 4404 – the voluntary National Standard for Land Development and Subdivision Infrastructure. This in turn has informed local policy such as the Wanganui Urban Development Strategy.</p> <p>During consultation the principle of Connections figured highly, along with Context. The community wanted to be connected, in the right way for convenience of movement, in the right environment. The recognition of existing character was also highlighted as an important feature of good development in the Wanganui urban area.</p>
Appropriateness	<p>The Wanganui District Council is a signatory to the New Zealand Urban Design Protocol (the Protocol) on behalf of the Wanganui Community. Therefore, Council and the community have indicated a desire for good and better quality urban. The outcomes from the Protocol are also complimentary to those sought by the Family Friendly Strategy 2012 to 2022.</p>

	<p>The government has also identified that urban design is an area that is highly importance as part of the Phase 2 reforms of the Resource Management Act. In particular, rather than rely on quality urban environments being addressed through the management of ‘physical resources’, urban design may be recognised as a ‘matter of national importance’.</p> <p>While Wanganui’s urban area generally expands incrementally and slowly, the proposed Objective is considered appropriate for the above reasons as additional urban development will continue, and such an approach will enable the provision of quality urban environments which will further enhance Wanganui as a place of high liveability.</p>
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Proposed objective	Relates to Existing Objective/s
Objective 41	Objective O17, O40

Subdivision qualities

O42	<p>Subdivision and infrastructure development that:</p> <ol style="list-style-type: none"> a. Performs its function effectively, b. Is flexible in design, c. Provides resilience to natural hazards, d. Is durable over its intended lifespan. e. Provides capacity in reticulated services for the intended future land uses in the catchment; f. Provides for ongoing maintenance; g. Achieves lifecycle costs that are affordable to the community; h. Takes into account the risk of climate change.
Comment	<p>Proposed Objective 42 is focussed on the basic fundamental functions of Subdivision infrastructure. First and foremost, it must meet its functional requirement. In other words, it must do what it is required to do for example, supply sufficient water volume and pressure over a specified period to a sufficient standard.</p> <p>Flexibility was a matter discussed during consultation and identified as being desirable by the development community. This provides for alternative solutions to infrastructure issues that enables the potential for reduced cost, unique and individual developments, more environmentally friendly and low impact development.</p> <p>Durability and resilience to natural hazards are fundamental requirements for any piece of infrastructure and have a close relationship with affordability. The community does not have the resources to continually replace unreliable or hazard prone</p>

	<p>infrastructure.</p> <p>Infrastructure development is also required to provide sufficient capacity to be constructed to meet the anticipated requirements within the servicing catchment. In particular, a catchment based approach will help to avoid issues from incremental development creating barriers to further development by created points that are anticipated to be the end of the catchment at the time of development.</p> <p>The effects of climate change have the potential to mitigate the effectiveness of infrastructure, in particular, stormwater infrastructure. Where systems are designed without factoring additional rainfall intensity and other related factors, systems could fall short in terms of levels of service and require costly Council upgrades.</p>
Appropriateness	<p>The Objective is considered appropriate as it identified and requires the basic qualities and requirements that apply to all reticulated infrastructure.</p> <p>First and foremost the most basic requirement is that it performs its basic function effectively, this ensures the health and safety of the community. In addition, flexibility in design allows a more creative and potentially efficient use of resources.</p> <p>Climate change is recognised as having an impact now, and into the future in terms of the way infrastructure systems are design and constructed. The rate and nature of changes appears to be accelerating, so planning for these effects over the lifespan of a piece of infrastructure is crucial to ensure that infrastructure maintains a suitable level of service over its intended lifespan. In addition, resilience to natural hazards is important for the same reason, as is durability.</p> <p>Infrastructure must also provide capacity in reticulated services for the whole of the catchment, not just for the development which is serves. Infrastructure networks are systems of connections and accumulation. In many instances, what happens at the top, or even in the middle, of a catchment has downstream impacts.</p> <p>Sustainable infrastructure should also be affordable to manage in the long term, and be able to be maintained for future generations to its full potential.</p>

Proposed objective	Relates to Existing Objective/s
Objective O42	Objective O17, O40

Subdivision and Network Utilities

O43 Subdivision and development in Wanganui that does not compromise the effectiveness of existing network utilities.	
Comment	<p>The term network utilities is applied to a range of structures, buildings, reticulation lines (eg, telecommunications) or spaces located on, in or over land or water.</p> <p>Network utility services support land use activities, including subdivision, and contribute to the health, safety, socio-economic wellbeing and quality of life of people and communities</p> <p>They have physical capacity limits and require on-going maintenance. The safe and efficient operation of the facilities can be adversely affected by land use activities.</p> <p>Infrastructure facilities have specific locational and operational requirements. Incompatible subdivision and land use activities can reduce the efficiency or impose constraints on the operation, maintenance, upgrading and development of these facilities. These effects can, in turn, adversely affect community health and safety.</p>
Appropriateness	Objective O43 is appropriate as it supports the health and safety benefits to the community from the operation of Network Utilities from activities that are incompatible. The wider benefits are protected from individual activities.

Proposed objective	Relates to Existing Objective/s
Objective O43	Objective O1, O17

Recognition of Maori Culture and Traditions

O4 Traditional practices and beliefs in resource management are recognised and valued.	
Comment	The Objective – O4 has only been slightly modified in that the description has been removed. The Objective is still relevant in that it seeks to encourage the strategic management of infrastructure now and into the future, while balancing the needs of the natural and physical environment.
Appropriateness	As the Objective has not materially changed, no issues were raised during consultation, and that if no significant adverse effects arise, the retaining of Objective 17 is deemed appropriate.

Proposed objective	Relates to Existing Objective/s
Objective O4	Objective O4

Development and Maori values

O44 Development that avoids or mitigates adverse effects on the cultural values of items and places of significance to Maori.	
Comment	The Objective was developed as a response to the potential loss or damage to Maori cultural values as a result of development works. Specifically, earthworks are identified as a significant risk to sites or items of significance.
Appropriateness	Proposed Objective O44 is appropriate as it allows the Wanganui District Council to partially meet its obligations under Part II of the Resource Management Act. It recognises and addresses the potential impact that development works can have on items and places of significance to Maori.

Proposed objective	Relates to Existing Objective/s
Objective O44	Objective O4,

Quality earthworks development

O45 Earthworks and land modification in Wanganui that:	
<ol style="list-style-type: none"> 1. Maintains or enhances: <ol style="list-style-type: none"> a. Amenity values b. Landforms and natural processes c. The efficiency and effectiveness of infrastructure d. The safety of people and property e. The stability of soils; AND 2. Has appropriate regard to cultural heritage sites and values. 	
Comment	<p>The District Plan previously has not had a framework for managing earthworks. This is the first attempt at providing a framework. Consultation, and recent experience within Council, raised the issue of a more proactive way of managing the effects of earthworks and land modification.</p> <p>While the Objective provides for the maintenance of matters (a) to (e), there may be ties where works are required, or provide for enhancements in these areas, in particular, the stability of soils.</p> <p>The community was concerned about issues surrounding amenity effects. In particular the likes of dust and noise, and did show an interested in limited large scale modification to land features.</p> <p>Council has recently undertaken several prosecutions around the creation of significant adverse environmental effects arising from poorly managed earthworks. This highlighted the need to specifically address the matter in the District Plan.</p>

Appropriateness	Objective O45 is appropriate as it addresses matters that have been raised in Consultation with the community and internal staff in the managing of effects on natural and physical resources. In addition, the Objective addresses specific areas that have been affected by poorly managed earthworks in the Wanganui District in the recent past, past.
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Proposed objective	Relates to Existing Objective/s
Objective 45	N/a

Recognising the importance of the Electricity Transmission Network

OX1	<p>1. To recognise the importance of the national grid to the local, regional, and national social and economic well-being , including by;</p> <p>a. Providing for the sustainable, secure and efficient use and development of the electricity transmission network.</p> <p>b. Minimising risks to safety; and</p> <p>c. Preventing sensitive activities and managing the expansion of such existing activities, from locating within a transmission corridor where they would affect or be affected by the transmission line.</p>
Comment	The Objective addresses the requirements of the National Policy Statement for Electricity Transmission (NPSET), which Council is required to 'give effect to'. Its focus is on managing the existing transmission lines of the National Grid. The objective seeks to protect the network from reverse sensitivity, enable ongoing use, operation and maintenance.
Appropriateness	The Objective OX1 is appropriate as it goes part way to giving effect to the NPSET, and provides for the health, safety and economic wellbeing of the wider community.

Policies

The following existing policies are amended and new policies included as part of Phase Two of the District Plan review process as follows:

Compact urban development

Policy P1 Promote a pattern of urban development that is compact and efficient in the use of land and infrastructure services	
Relates to Objective/s: Objective 17, New Objective 40, New Objective 42	
Comment	Existing Policy P1 has been amended to focus on compact urban form and the efficient use of infrastructure. This is a change to the previous policy where the priority was to match development and the management of infrastructure. Additional policies are now proposed to achieve this function.
summary of benefits	As proposed, the policy should reduce the cost of servicing new and existing development for Council, and therefore ratepayers by consolidating rather than dispersing development. Compact places are easier to get from one point to another, are efficient with regard to the use of productive soils and can be more energy efficient with regard to transport networks.
summary of costs	There is potential for an increase in the retail cost of land for development. There is also potential to limit the choice of lifestyle/ housing choice. However, these costs are mitigated by the low or negative growth population projections for the Wanganui urban area. Further to this, the Springvale Indicative Future Development Area has identified an area of land that will accommodate any new demand for the foreseeable future, in combination with the significant amount of existing undeveloped or underdeveloped residential land.
Effectiveness	The Policy is considered to be effective in avoiding urban sprawl and reducing unnecessary spending on infrastructure.
Efficiency	The Policy promotes the efficient use of existing infrastructure, particularly in that the population of Wanganui is experiencing low or negative growth, making the development of new infrastructure inefficient.
Appropriateness	Policy P1 continues to be appropriate as Wanganui continues to experience no or low growth, and infrastructure spending is currently unaffordable to the community.
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	With low or negative population growth, inaction may not be perceived as a risk. However, with the development of households and extensions of infrastructure on the periphery of urban Wanganui, a fall in population projected, and the increasing cost of servicing

	<p>development, provide an unsustainable financial burden on ratepayers.</p> <p>The potential risk of acting is considered low as Council has identified sufficient resource to meet projected housing demand for several decades.</p>
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Development within the urban boundary

Policy P2 Require new urban subdivision and development to locate in areas within the urban boundary and where there is available infrastructure capacity or where upgrades or extensions to services have been programmed

Relates to Objective/s: Objective 17, Objective 40

Comment	<p>The Policy replaces Policy P2 in the Residential Zone and has been strengthened from 'promote' to 'require'. The intent of the policy differs from P121 which promotes consolidation, or P122 which seeks to establish a minimum level of service for residential development. Rather, the focus of P2 is requiring urban scale development within the Urban Boundary to locate where the levels of service established by P122 can be achieved. However, this is not required to be fully reticulated. Policy P143 provides for alternative solutions to meet required levels of service.</p> <p>The Policy aims to ensure that most residential development occurs within the Residential Zone where investment in services are planned for and anticipated. This enables more efficient long term planning of infrastructure development and reduces the long term costs of ad-hoc development.</p>
Summary of benefits	<p>The Policy supports the viability of the Residential Zone by focussing development in the areas that have been identified for development. This gives certainty to the community and allows growth to be better managed.</p> <p>The policy also allows Council to efficiently plan, manage and operate infrastructure in a manner that is cost effective and coordinated.</p>
Summary of costs	<p>Areas that are currently able to be developed to a residential scale and character but not within the Residential Zone may be disadvantaged with regard to the ability to develop. However, these areas have been rationalised as part of the review process to avoid the expectation of development suitability.</p>
Effectiveness	<p>The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.</p>
Efficiency	<p>The Policy is efficient as it is a slightly amended existing</p>

	Policy, and that it promotes efficient use of land with existing infrastructure investment.
Appropriateness	P2 is appropriate in that it promotes a compact urban area and efficient use of existing infrastructure investment.
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>With low or negative population growth, not acting may not be perceived as a risk. However, with development of households with fewer persons per household, even with a fall in population, and combined with the increasing cost of servicing development, may provide an unsustainable financial burden on ratepayers.</p> <p>Inaction can compromise the future viability of the Residential Zone by allowing continued dispersal of residential development in areas not intended to support a density or residential development or level of service from infrastructure.</p> <p>The potential risk of acting is considered low as Council has identified sufficient resource to meet projected housing demand for several decades.</p>

Optimal use of existing infrastructure

<p>Policy P74 Promote the optimal use of existing reticulated infrastructure by identifying and supporting areas of increased density where:</p> <ul style="list-style-type: none"> a. Infill and higher density development does not compromise environmental quality and amenity values; AND b. Suitable levels of service can be achieved. <p>Relates to Objective/s: Objective 17, New Objective 40, New Objective 42</p>	
Comment	<p>The previous policy P74 was developed as a response to the significant infrastructure renewals being undertaken at the time of the development of the District Plan. The policy sought a strategic approach to managing what was mainly replacement infrastructure. As most of these works have been completed this is no longer as relevant.</p> <p>This Policy refers to the strategic use and allocation of infrastructure resources, when it comes to identifying land and land servicing options. This provides for better strategic management of infrastructure assets.</p>

	<p>There is evidence of a lack of capacity of some services in some areas, and potentially excess in others. Development should be focussed on areas where there is existing capacity before locating in areas which capacity needs to be provided for. In addition, areas that have been allocated capacity should generally be to those who use it. Conversely, where capacity has been allocated to particular land and uses it should not be used by those, to whom it is not allocated.</p> <p>This policy supports the areas the areas that have been zoned for more intensive development and have infrastructure provided and available for the purpose.</p> <p>Rural lifestyle development in areas surrounding the Wanganui urban area has been demanding residential levels of service with regard to reticulated services. As these are intended to be serviced by on-site means, capacity that is required to service residentially zoned land is therefore taken up by areas with a lower density of users. This also increases the cost to the community as there are less people per meter of pipe' to pay for capacity and maintenance.</p>
Summary of benefits	The primary benefit of this Policy is the efficient use of existing infrastructure capacity. This will reduce the need and cost in developing additional capacity that will need to be maintained by the projected static number of ratepayers. The policy also promotes efficiency in the supply of infrastructure in that those that are allocated the resource will be getting the use of that resource. This allows for better infrastructure management and enables the fair allocation of costs between ratepayers.
Summary of costs	Areas that are not currently serviced but are identified as suitable for development that may be disadvantaged with regard to the ability to develop. However, these areas have been rationalised as part of the review process to avoid the expectation of development suitability.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P74 is efficient in that is seeks to get the optimum performance out of existing infrastructure.
Appropriateness	The Policy is appropriate as it promotes the efficient use of existing infrastructure.
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>The risk of acting is that development in new areas are discounted, forgoing growth.</p> <p>The risk of not acting is increasing costs to Council (and community) requiring</p>

	additional capital works to service development where it could have been accommodated in other parts of the existing systems.
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Infrastructure for new subdivisions

Policy P76 Ensure on-site infrastructure facilities, and the portion of the cost of providing upgrades or extensions to Council owned infrastructure, relating to growth are paid for by the developer.

Relates to Objective/s: Objective 17, New Objective 1, New Objective 10

Comment	This is an existing policy that has been amended slightly. The previous version of P76 refers to a 'significant portion' of upgrades and extensions to infrastructure should be paid by the developer. The focus has been amended slightly to require the developers of subdivisions to internalise that cost completely, but only to a level required to service that development or subdivision. This is intended to be in addition to any financial contribution required to fund any capital works to provide capacity in the broader network.	
summary of benefits	The persons who directly benefit from an increase in capacity or levels of service are those who pay. The costs are related only to those required to service a development.	
summary of costs	More costs are borne directly by the developer and not the wider community.	
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.	
Efficiency	Policy P76 is efficient as it will require payment and or upgrades in close proximity to actual additional demand.	
Appropriateness	The Policy is appropriate it provides for efficient and affordable infrastructure.	
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	The risk of acting is the increase in costs may limit development.	The risk of not acting is additional public fund and debt may used to fund and subsidise private development.

Protect infrastructure

Policy P80 Protect reticulated and network utility infrastructure resources in the District from the adverse effects from inappropriate land use and subdivision development which compromises operation, maintenance and upgrading.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 42, New Objective 43

Comment	Policy P80 has been retained. However, the explanation has been removed. The policy explicitly addresses both reticulated and network infrastructure, and clarifies the
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	direction is to protect their effectiveness from subdivision and development that is not appropriate.
Summary of benefits	Policy P80 ensures security and continuity of supply in infrastructure that ensures the health and safety of a wider community.
Summary of costs	Limited development opportunities for some locations and types of development.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P80 is efficient as it protects the existing investment in network utilities.
Appropriateness	The Policy is appropriate in that it protects network utilities.
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>The risk of acting may lead to broader restrictions on development where the requirements of infrastructure are larger than anticipated.</p> <p>The risk of not acting is to allow inappropriate development to interfere with the critical functions of infrastructure, potentially putting the health and safety of the community at risk.</p>

Provide for network utilities

Policy P81 Provide for the establishment, maintenance and repair of network utilities to meet the needs of the community, including at a local, regional and national scale, in a manner that enables adverse environmental effects to be avoided, remedied or mitigated, including effects on natural, cultural and amenity values.

Relates to Objective/s: Objective 17, New Objective 43

Comment	Policy P81 has been retained, but has had the commentary removed. The policy enables the development of network utilities, subject to the management of effects on the environment. The addition of levels of scale regarding utilities has been added to recognise that some networks have regional and national importance as well as significance to Wanganui.
Summary of benefits	The benefits of Policy P81 are the provision of network utilities that are critical for the health and wellbeing of the community.
Summary of costs	The costs are likely to be minimal where the effects of network utilities are internalised, and that this policy has been operative for a long period of time without significant adverse effects.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.

Efficiency	Policy P81 is efficient as it establishes the ability to provide for network utilities.
Appropriateness	The Policy is appropriate as it enables and protects network utility infrastructure.
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>The risks of acting are minimal as the effects arising from the policy are well established.</p> <p>The risks of not acting to retain the policy are the interruption of the loss of the network utility services that maintain the health and safety of the community.</p>

Residential development

Policy P121 Require new subdivision and development of residential scale, intensity, and character to locate within the Residential Zone.

Relates to Objective/s: Objective 17, New Objective 42

Comment	Policy P121 is to be viewed in conjunction with Policy P122, and P2 and aims to support a compact and resource efficient urban area that provides for residential uses. The Residential Zone has been serviced and a level of amenity provided that specifically meets the requirements for residential activities, and is therefore the most suitable location for consolidated residential activities. The policy is not intended to limit the provision of lifestyle development in the Proposed Rural B Zone where density is more intensive than one allotment per 5000m ² or net site area and serviced on-site. The minimum allotment size gives effect to the requirements of the Manawatu Wanganui Regional Council's OnePlan.
summary of benefits	Provides certainty in investment for developers and capital investment in services, avoids reverse sensitivity effects.
summary of costs	Limited flexibility in terms of where residential development may occur in the future.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	The Policy is efficient in that it is clear what is intended, and promotes the use of existing infrastructure investment.
Appropriateness	Policy P21 is appropriate as significant investment is made in reticulated infrastructure to service residential development, and avoids urban sprawl. Land is also allocated into 'zones' to support the needs and requirements of the particular uses they provide for. Activities of a residential scale may produce unintended effects in other locations, including reverse sensitivity to the activities that were intended to be established.
Risk of acting or not acting if there is uncertain or insufficient information about	The risk of not acting is the continued sporadic, spread out, and disjointed

the subject matter of the policies, rules, or other methods	<p>development that currently occurs around the periphery of the urban area surrounding Wanganui.</p> <p>The risk of acting is limiting the opportunities for development where people wish to live.</p>
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Residential levels of service

Policy P122 Require new residential subdivision and development to locate in areas where there is a suitable level of service from reticulated infrastructure available.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 41

Comment	Policy P122 is part of a suite of Policies, including Policy P121 that seeks to manage the relationship between development and infrastructure. The Policy seeks to establish an appropriate standard to which residential areas can and should be serviced. In this instance, the suite of provisions and documents including the District Plan, NZS 4404 2004, and the Wanganui District Council Land Development and Subdivision Engineering Document 2012 determines what suitable levels of service for infrastructures are. . However, this does not discount the subdivider providing that level of service, nor is it intended to preclude alternative infrastructure solutions. The policy should be read in conjunction with the other policies that manage development and infrastructure.
summary of benefits	Policy 122 promotes a compact urban area, certainty in private and public investment in services, supports the efficient use of existing infrastructure resources, and reduces the need for additional capital expenditure on reticulated services.
summary of costs	The Policy may reduce the flexibility in terms of where new development may located.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	The Policy is efficient as its requirements are clear.
Appropriateness	Policy P122 is appropriate in that it ensures residential subdivision and development are provided with sufficient levels of infrastructure to maintain health, safety and amenity.
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>The risk of not acting is continued sporadic development which is disjointed and requiring additional capital expenditure in order to service, and an inefficient use of existing infrastructure resources.</p> <p>The risk of acting is the limitation of</p>

	market demand in the locations in which the community wish to develop and live in Wanganui.
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Allocated infrastructure

Policy P123 Avoid subdivision and land use development that utilises infrastructure capacity allocated for other identified areas or uses.	
Relates to Objective/s: Objective 17, New Objective 40, New Objective 42	
Comment	Policy 123 seeks to ensure that land zoned for development retains that ability by maintaining the servicing capacity that is anticipated to provide for it within the infrastructure networks.
summary of benefits	This policy provides certainty for those who have invested in land identified as being suitable for development. This enables straightforward financial planning around the costs of providing suitable levels of servicing to development.
summary of costs	The main costs are flexibility and the opportunity cost of developing in other areas that are not planned to be serviced. However, when viewed in conjunction with Policy P2, these areas should only be within the Urban Boundary and may be the result of development intensity exceeding what is anticipated by the existing network. However, Policy P143 provides flexibility in enabling alternative servicing solutions within the bounds of Policy P2.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	The Policy is efficient as areas that have been allocated servicing infrastructure are able to use it and additional infrastructure to service that area is avoided.
Appropriateness	Policy 123 is appropriate as it supports planned infrastructure allocation and investment.
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>The risks of not acting are relatively low in that growth pressures in the Wanganui urban area are low. However, with some parts of the urban area experiencing limited capacity, the allocation of servicing infrastructure to other areas may render some land un-developable, or more expensive to develop.</p> <p>The risk of acting includes the potential to stifle development in some areas over others. In particular where the market may demand as opposed to where infrastructure capacity has been allocated.</p>

Reduction in residential allotment size

<p>Policy P124 Provide for a reduction in minimum allotment size in the residential zone where the entire infrastructure catchment can support both:</p> <p>a. The level of service required by the proposed development, AND;</p> <p>b. The proposal will not reduce the ability of the catchment to provide for development in any other location for which it is intended to service.</p>	
<p>Relates to Objective/s: Objective 17, New Objective 40, New Objective 42</p>	
Comment	<p>Plan Change 27 proposed a minimum allotment size of 450m² where previously the Operative Wanganui District Plan had no minimum. While most development currently sits within a regular size of approximately 450m² to approximately 700m², recent development, particularly in the Otamatea area, has begun to reduce minimum site sizes. Statistics suggest that, given Wanganui's ageing population, this trend is likely to continue. There is only limited capacity in reticulated services. However, Policy P124 seeks to enable intensive development where there is suitable capacity. It is envisaged that this policy can work in conjunction with both P123 so other land will not have its developable potential limited, and P143, which enables alternative infrastructure solutions. There is limited knowledge of the abilities of the reticulated services catchments to sustain allocations of use. The draft Otamatea Structure Plan included an assessment of services capacity that has identified deficiencies.</p>
summary of benefits	<p>Policy 124 ensures that reticulated infrastructure systems are not over allocated, avoiding health and safety costs, capital expenditure by Council, while enabling more intensive development to meet market demand, and demand in locations that may be under serviced.</p>
summary of costs	<p>Additional costs may be borne by the developer in ascertaining catchment capacity and providing alternative servicing solutions.</p>
Effectiveness	<p>The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision consents.</p>
Efficiency	<p>The Policy is efficient as it enables maximum use of allocated infrastructure and development.</p>
Appropriateness	<p>Policy P124 is appropriate as it it promotes sustainable use and development.</p>
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules,	<p>The risk of not acting is the potential over allocation of reticulated infrastructure. The risk of acting is providing a</p>

or other methods	disincentive for more compact development.
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Quality Infill development

<p>Policy P125 Promote infill subdivision and development that:</p> <ul style="list-style-type: none"> a) Complements the character of the area in which it is located b) Is located in an area that has capacity for reticulated services c) Provides on-site amenity d) Enables continued solar access. <p>Relates to Objective/s: New Objective 40</p>

Comment	Policy P125 refers to infill development which is the intensifying of development in existing areas of development, as opposed to new or undeveloped areas. The focus of the policy is the provision of quality infill development that provides good places to live, that can be serviced, and compatible with the surrounding amenity.
Summary of benefits	Provides high quality in-fill development, makes use of existing infrastructure, within and complementing existing areas of development.
Summary of costs	Additional assessment of subdivision quality for developers.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision consents.
Efficiency	Policy P125 is efficient in that it provides a clear direction in terms of what outcomes are required.
Appropriateness	The Policy is appropriate as it promotes sustainable and low impact subdivision.
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>The risk of acting is the limitation of the potential for sites to be able to be utilised for efficient infill development.</p> <p>The risk of not acting is ad-hoc development of subdivision in residential areas that may singularly or cumulatively reduce the amenity qualities of a neighbourhood.</p>

Rural B Zone connections

<p>Policy P126 Avoid connections to, and extensions of, the reticulated infrastructure network in the Rural B Zone.</p> <p>Relates to Objective/s: Objective 17, New Objective 40, New Objective 42</p>		
<table border="1"> <tr> <td>Comment</td> <td>Policy P126 sits along side the Objectives and Policies within the Rural B Zone in avoiding the expansion of reticulated infrastructure into this zone. The focus is on maintaining a rural residential type feel and on-site servicing. In that regard this policy works in conjunction with P142. The Policy also</td> </tr> </table>	Comment	Policy P126 sits along side the Objectives and Policies within the Rural B Zone in avoiding the expansion of reticulated infrastructure into this zone. The focus is on maintaining a rural residential type feel and on-site servicing. In that regard this policy works in conjunction with P142. The Policy also
Comment	Policy P126 sits along side the Objectives and Policies within the Rural B Zone in avoiding the expansion of reticulated infrastructure into this zone. The focus is on maintaining a rural residential type feel and on-site servicing. In that regard this policy works in conjunction with P142. The Policy also	

	seeks to manage unnecessary and expensive expansion of infrastructure.
summary of benefits	The benefit of Policy P126 is that it consolidates residential services and allows infrastructure to be more appropriately allocated to higher density development.
summary of costs	The costs of Policy P126 include reducing the amount of development possible in the zone.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P126 is efficient in that it allows the urban services to be allocated to urban uses, and that all services can and should be carried out on site, and therefore should not need urban services.
Appropriateness	The proposed Policy P126 is appropriate as it promotes an efficient use of infrastructure resources.
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>The risk of acting is preventing development which may have otherwise occurred.</p> <p>The risk of not acting is additional urban sprawl and extensions of urban services, with less ratepayers to pay for capital works and maintenance.</p>

Servicing information

Policy P127 **Ensure adequate information is provided prior to the granting of subdivision or land use consent to demonstrate that there is provision for additional connections to reticulated infrastructure and network utilities to all allotments to a suitable standard.**

Relates to Objective/s: Objective 17, New Objective 40, New Objective 42

Comment	<p>The Policies above are part of a framework that requires the identification of suitable levels of service up front as part of the application, and the actions that are required when suitable levels of service or infrastructure are not available. However, it should be noted that the intent of these Policies is on the services that are required for the particular project, and not intended to require developers to pay or fix existing deficiencies in the network/s.</p> <p>Council in its Draft 2012 to 2022 Long Term Plan has identified funding for modelling of its reticulated network over this period. Anecdotally, there are areas in the reticulated systems that are over allocated or close to capacity. However, the exact location and nature of these is not yet fully understood.</p>
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	The Policies apply equally to land use and subdivision in the Residential Zone. However, the methods used to implement the policy may differ.
Summary of benefits	Primarily these Policies allow key issues to be identified early on in the development process. The Policy also enables development to proceed without full information on capacity or where capacity is exceeded where suitable alternative methods can be found.
Summary of costs	The costs are primarily located at the beginning of the subdivision process where an applicant may be required to identify the ability of a proposal to be serviced by reticulated infrastructure. However, as this is likely what would have occurred previously, the policy is in effect just entrenching this practice.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision consents.
Efficiency	Policy P127 is efficient in that it promotes the provision of sufficient information at the beginning of the consent process and may avoid delays.
Appropriateness	The Policy is appropriate as it ensures that sufficient information is available for applications to meet the Objectives of the Plan.
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>The risk of not acting may include considerable delays in the processing of subdivision and resource consents arising from a lack of clarity over what is expected from the servicing requirements of development. Delays in processing consents add to the costs borne by developers. Outlining clear expectations will limit uncertainty and should reduce processing times. There is also potential for inconsistent levels of service provided. In particular, over allocation of capacity in reticulated services.</p> <p>The risk of acting is that some development may be restricted where imperfect information is available. This may place additional costs to the developer where they choose to proceed with a development and provide that level of service (either by way of new or alternative infrastructure provision) as a part of a proposal.</p>

Infrastructure qualities

<p>Policy P128 Require Infrastructure design, construction, operation and maintenance to be:</p> <ul style="list-style-type: none"> a. Effective in meeting its functional purpose b. Able to be maintained in an efficient manner. c. Cost effective and affordable. d. Durable. e. Integrated with other infrastructure and land uses. f. Responsive to local conditions. g. Compatible with network utilities and other reticulated infrastructure, h. Designed and constructed taking into account the effects of climate change. i. Resilient to natural hazards. 	
<p><u>Relates to Objective/s:</u> Objective 17, New Objective 40, New Objective 42</p>	
Comment	Policy 128 is a direct response to the functional requirements of Objective O42. The policy sets the minimum performance qualities that are required of all infrastructure, and is seen as the headline policy providing the bottom-line in this area. The policy is also intended to work with a number of other policies to achieve flexibility and be enabling.
Summary of benefits	The benefits are the provision of suitable, sustainable, and quality infrastructure assets to the community and to those who will benefit from it. Policy 128 also provides certainty in terms of what is to be expected from developers. The focus is on affordable quality and effectiveness.
Summary of costs	The costs potentially arising from P128 may fall on developers who will be required to provide a more suitable level of infrastructure quality instead of the community who would otherwise be required to pay for repairs or replacements.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P128 is efficient in that it promotes efficient infrastructure that meets a range of requirements to provide a suitable level of service at an affordable cost.
Appropriateness	The Policy is appropriate as it promotes the qualities desired from subdivision infrastructure.
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	The risk of acting is creating additional requirements and costs for developers to meet in servicing subdivision development.

	The risk of not acting is allowing lesser quality infrastructure serve the community.
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Reticulated catchment requirements

Policy P129 Require the design of new reticulated wastewater and stormwater infrastructure to take into account:

- a) The relevant upstream and downstream capacity and restrictions in the servicing catchment when land in the catchment is fully developed to a level anticipated by the District Plan.
- b) The future anticipated servicing demand of the proposed development when completed.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 42

Comment	Policy 129 promotes a ‘whole of catchment’ approach to infrastructure use and development. This approach is promoted in NZS 4404: 2010 as a means of managing infrastructure resources. This is particularly important where the capacity within some reticulated services in parts of the urban area of Wanganui have limited information around their performance and capabilities.
Summary of benefits	The benefits of Policy P129 include the incorporation of future development needs within a catchment, avoiding an under provisioning of network capability and costly upgrades. The other primary benefit is that downstream capacity is assessed and addressed. In particular, the costs of providing upgrades to the network will likely fall on those who directly benefit.
Summary of costs	Costs from Policy P129 will most likely fall on developers in terms of determining capacity, and who are likely to be required to contribute or fund the cost of capital works in the catchments in order to provide for their development.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P129 is efficient as the policy enables the development of land that is zoned for development and potentially constrained by deficiencies in existing stormwater, water, and wastewater infrastructure.
Appropriateness	The Policy is appropriate in that it assists in ensuring capacity in infrastructure catchments.
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>The risk of acting is to place additional costs on developers in funding research and capital works to address deficiencies in servicing catchments.</p> <p>The risk of not acting is inadvertently stressing downstream parts of the</p>

	servicing network and placing the costs on upgrades or mitigation works on the community rather than those who benefit.
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Connectivity of reticulated services

Policy P130 Require connectivity and compatibility between existing and new reticulated infrastructure.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 42

Comment	<p>Policy P130 focuses on the connectivity of both reticulated and roading infrastructure. Reticulated services in that not only pipes and the like are required to physically join, but modes of servicing need to be compatible. For example, low impact stormwater devices may be required to discharge into the reticulated network by way of pipe at some point.</p> <p>Roading connectivity provides efficiency in vehicle movements and ease of access to a public spaces, work, and housing areas.</p>
summary of benefits	The benefits from P130 include more efficient development, reduced costs, and improved travel times for transport infrastructure.
summary of costs	Development will be required to take a more strategic view, potentially costing time and money researching appropriate options, routes and connections.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P130 is efficient as it promotes connectivity .
Appropriateness	Proposed Policy P130 is appropriate in that it achieves good quality urban design outcomes, and contributes to low impact development.
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>The risk of acting can include increased costs of development in order to provide for connectivity where services will only achieve this outside the foreseeable future.</p> <p>The risk of not acting includes the additional cost of connecting new and existing infrastructure. With regard to transport, the risk of not acting is inefficient roading layouts, separating the community from public spaces, and an inefficient use of land.</p>

Appropriate level of infrastructure

<p>Policy P132 Require all new residential subdivision to connect to an appropriate level of infrastructure and network utilities prior to the issue of a certificate pursuant to Section 224 of the Resource Management Act 1991.</p>	
<p>Relates to Objective/s: Objective 17, New Objective 1, New Objective 10</p>	
<p>Comment</p>	<p>Policy P132 directs when servicing connections to reticulated and network infrastructure is required as opposed to P122 which establishes a requirement for a level of performance/service. The current provisions of the District Plan are ambiguous in that single allotment subdivisions are currently not required to provide connections, but are intended to do so.</p> <p>Connections are intended to be present at the time of completion of subdivision so development on an allotment can proceed immediately and without hidden investment required by the development of the allotment. This does not limit the ability to bond certain works by the subdivision developer.</p> <p>The level or quality of infrastructure is determined by a combination of the performance requirements of the District Plan, NZS 4404 2004, and the Wanganui District Council Land Development and Subdivision Engineering Document 2012. Compliance with these documents is deemed a suitable level of service.</p>
<p>Summary of benefits</p>	<p>The main benefit from Policy P132 is that all allotments should be serviced and ready for development prior to the completion of subdivision.</p>
<p>Summary of costs</p>	<p>Cost will mainly fall on subdivision developers in ensuring sites are development ready when completed.</p>
<p>Effectiveness</p>	<p>The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision consent.</p>
<p>Efficiency</p>	<p>Policy P132 is efficient as it incorporates connections into the subdivision process and avoids additional works after completion.</p>
<p>Appropriateness</p>	<p>The Policy is appropriate in that it ensures suitable levels of service for land use activities.</p>
<p>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>	<p>The risk of acting is negligible.</p> <p>The risk of not acting is that some sites are created without suitable servicing, and some are. This can send mixed messages to the property market in terms of price, and can unexpectedly add significant costs to the development of</p>

	an allotment.
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Subdivision and Infrastructure – Transport

Integrated streets

Policy P133 Promote street design streets that integrate transport functions with adjoining lands uses in a manner that is appropriate for surrounding environment.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42

Comment	Policy P133 aligns with the philosophy of urban design and the New Zealand Urban Design Protocol. Principally, the policy promotes transport infrastructure to be designed to meet its functional purpose in the roading hierarchy, but also reflect the environment in which it locates and the surrounding uses.
Summary of benefits	The primary benefit from Policy P133 is the integration of transport infrastructure with the environment. This allows more tailored and flexible designs.
Summary of costs	The additional choice can be confusing for developers in choosing the most appropriate transport corridor design.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P133 is efficient as new roads will be constructed in a more appropriate manner and not require additional works for mitigation works or works to make them more appropriate to their setting, uses and environment.
Appropriateness	The policy is appropriate as it integrates infrastructure with land uses and the environment.
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>The risk of acting is the wrong transport corridor typology is still used.</p> <p>The risk of not acting is transport corridors do not reflect their function and, surrounding uses and environment. This can provide a disconnect between the corridor and the community.</p>

Liveable streets

Policy P134 Encourage the development of liveable streets that contribute to a sense of place, safety and positive community interaction by enabling activities that integrate transport corridors with adjoining land uses.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42

Comment	Policy P134 seeks to develop more liveable environments through a range of uses of the transport corridor, including for 'place making' purposes. This may include street furniture,
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	differing allocations of space/uses within a corridor cross section. This policy is intended to be complementary to Policy P133 in that this policy enables uses, and P133 guides what is an appropriate design in terms of the surrounding environment, uses, and road function.
Summary of benefits	The benefits of P134 include increased liveability, connecting the community with infrastructure, enabling land uses, and providing flexibility in corridor design.
Summary of costs	The potential cost of P134 may be additional cost of design, less certainty, and potential for additional costs of construction. However, this may not be the case, particularly as the policy only seeks to 'encourage' not 'require'.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy 134 is efficient as it enables uses on existing infrastructure to create liveable streets.
Appropriateness	The Policy is appropriate in that it promotes liveability and integrates infrastructure and the community.
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>The risks of acting include the loss of development due to uncertainty in terms of design expectations.</p> <p>The risk of not acting is the lost opportunity to enhance the liveability of Wanganui's urban areas.</p>

Roading hierarchy

Policy P135	Require new transport corridors to be designed, constructed, and operated in accordance with their intended function in the Roding Hierarchy.
Maintenance of Land Transport Networks	
PXX4	Maintain the ability of land transport networks to efficiently and safely move people and goods through and within the District.
Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42	
Comment	Policy P135 works with Policy P133 in that it aids in defining what the function of the transport corridor is. In addition, Policy PXX4 seeks to maintain their functional purpose. The Roding Hierarchy has also been updated in accordance with the recommendations of the Wanganui Urban Transport Strategy.
Summary of benefits	The benefit from Policy P135 is that it supports the investment in transport corridors.
Summary of costs	The policy may restrict some land uses that are in conflict with the status of a transport corridor in the roading hierarchy.

Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P135 is efficient as new roads will be constructed in a more appropriate manner and not require additional works for mitigation works or works to make them more appropriate to their setting, uses and environment.
Appropriateness	The Policy is appropriate in that it enables the transport network to be effective.
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>The risk of acting is to limit the roading designs unnecessarily and not allow for changes in transport corridors function in the roading hierarchy.</p> <p>The risk of not acting is that the function of the road is compromised by poor design.</p>

Multimodal connectivity

Policy P136	Require the connectivity of new streets and public accessways with existing infrastructure, in a logical progression and in a manner that does not compromise future subdivision or development of surrounding sites at the time of subdivision.
Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42	
Comment	Policy P136 seeks to promote connectivity in all forms of transport, in a manner that looks to the future. Development trends have promoted the use of cul-de-sac type roading layouts which can be inefficient, poor in terms of connectivity, and separate the community. Connectivity, either by way of road, cycleway, or walkway, improves access to areas of work, living, and play.
Summary of benefits	The benefits of Policy P136 are that it promotes a more strategic forward looking approach to road corridor layout design, promotes the efficient use of resources, and connects communities.
Summary of costs	There is a possibility that additional costs may fall on the developer where additional roading construction may be required to enable connectivity.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P136 is efficient as it promotes new infrastructure to provide connectivity, which is less expensive in the long term than connecting infrastructure after land has been fully developed.
Appropriateness	The policy is appropriate as it integrates infrastructure with land uses and the environment and connects people and infrastructure.

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>The risk of acting is that finding and creating connections could be expensive and cost prohibitive to develop in Wanganui.</p> <p>The risk of not acting is that the transport network becomes more disaggregated and communities less connected.</p>
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Legal and physical access

Policy P137 Require new allotments to have legal and physical access to a formed legal road.	
Relates to Objective/s: New Objective 40,	
Comment	Policy P137 puts in place a basic requirement for subdivision of new allotments to gain access, and relates to requirements under Section 106 of the Resource Management Act.
Summary of benefits	The benefits of the policy are that new allotments will have a suitable level of service for access.
Summary of costs	The costs of Policy P137 are the costs of acquiring and constructing access.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision consents.
Efficiency	Policy P137 is efficient in that what is expected is clear.
Appropriateness	The Policy is appropriate as it addresses safety and health.
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>The risk of acting is negligible.</p> <p>The risk of not acting is sites or activities that do not require access are required to do so.</p>

Low impact stormwater management

Policy P138 Encourage the use of low impact stormwater management in subdivision and development Zone where ground conditions are suitable.	
Stormwater mitigation	
Policy P139 Require the use of low impact stormwater management where downstream capacity in the reticulated system likely to be exceeded and ground conditions are suitable.	
Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42	
Comment	The policies above recognise that there are a number of benefits from using low impact stormwater solutions, and also that there are some circumstances where these approaches are necessary.

	<p>Low impact stormwater approaches provide opportunities to provide environmental benefits beyond the transportation and disposal of stormwater. They can more effectively manage contaminants, detain overland flows, reduce pressure on reticulated infrastructure, provide design elements to neighbourhoods, and even create recreation opportunities.</p> <p>There are a number of places within the urban areas of Wanganui that are thought to be at, or have already exceeded, capacity with regard to stormwater. Modelling is proposed in the 2012-2022 Long Term Plan to be undertaken in 2013, 2014, and 2015 in order to determine the level of capacity within Council's stormwater infrastructure.</p> <p>The policy works in conjunction with Policy P2 in that where full capacity is provided as part of a development proposal it will not be 'required' to provide low impact stormwater solutions, but they are still 'encouraged'.</p>
Summary of benefits	The use of low impact disposing, detaining or detaining of stormwater by means other than reticulated infrastructure can increase the life of existing services, while enabling development to continue.
Summary of costs	The use of low impact stormwater approaches can add complexity to subdivision development, and potentially additional maintenance costs over and above 'pipe and discharge' methods. However, this may not always be the case.
Effectiveness	The Policies are considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	P138 and P139 are efficient as the policies enable the development of land that is zoned for development and potentially constrained by deficiencies in existing stormwater infrastructure.
Appropriateness	The policies are appropriate in that it enables flexible and low impact infrastructure.
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>The risks of acting may include establishing a system of treatment that is expensive to maintain.</p> <p>The risks of not acting include preventing land that can not or will not be serviced by reticulated stormwater infrastructure.</p>

Reticulated wastewater

Policy P140	Require new allotments within the urban boundary to connect to the reticulated wastewater network, excluding lots for network utilities.
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<p>Reticulated water Policy P141 Require new allotments within the Urban Boundary to connect to reticulated potable water network, excluding lots for network utilities.</p> <p>Relates to Objective/s: New Objective 40,</p>	
Comment	This Policy is a basic requirement for the health and safety of the community. In particular, the Policy requires connection to the reticulated system.
Summary of benefits	Efficient and effective method for managing the wastewater demands of the district.
Summary of costs	The costs of Policy P140 and P141 are the costs of acquiring and constructing connections to the network.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision consents.
Efficiency	Policy P140 and P141 is efficient in that what is expected is clear.
Appropriateness	The Policy is appropriate as it addresses safety and health.
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>The risks of acting are negligible.</p> <p>The risk of not acting is the potential health and safety effects arising from on-site disposal of effluent, and an increase in site size required to process effluent on site, and potential health and safety effects arising from a lack of a reliable source of potable water.</p>

On-site services

<p>Policy P142 Require new allotments in the Rural and Rural B Zone to provide for wastewater and stormwater disposal onsite, and sufficient non-reticulated potable and fire fighting water supply.</p> <p>Relates to Objective/s: New Objective 40,</p>	
Comment	This policy works in conjunction with Policy 126 which avoids reticulated servicing being provided. Together, they reinforce that, outside the urban area, all activities need to provide for on-site servicing.
Summary of benefits	The benefits of Policy P142 include that non-reticulated sites are serviced, less pressure on Council's reticulated systems, and health and safety is maintained.
Summary of costs	In some instances, the costs of producing individual on-site systems are significant.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision

	consents.
Efficiency	Policy P137 is efficient in that what is expected is clear.
Appropriateness	The Policy is appropriate as it addresses safety and health and efficient use of infrastructure.
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>The risk of acting is potentially an increase in adverse effects arising from poorly functioning onsite services.</p> <p>The risk of not acting includes a reliance on expensive extensions to Council's reticulated infrastructure.</p>

Alternative infrastructure design

Policy P143 Enable the use of quality alternative infrastructure solutions where they are in accordance with industry best practice, quality urban design and infrastructure design principles where approved by the Manager, Infrastructure Services.

Assessment of alternatives

Policy P144 Require the assessment for the approval of alternative infrastructure solutions to be processed through the Alternative Design Procedure and meet the assessment criteria for quality urban design and infrastructure.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42

Comment	<p>The level or quality of infrastructure is determined by Policy P132 through a combination of the performance requirements of the District Plan, NZS 4404 2004, and the Wanganui District Council Land Development and Subdivision Engineering Document 2012. Compliance with these documents is deemed a suitable level of service.</p> <p>Policy P143 enables alternative solutions, and Policy P144 provides a process for providing servicing solutions to that level of service by alternative means. While the Plan currently accepts that there may be other solutions available other than what is specified from Council, a process and method of assessment has not been provided.</p> <p>This approach is promoted in NZS 4404 : 2010 as a method of provided for solutions that are more sustainable and cost effective.</p>
Summary of benefits	The benefits of Policy P143 and P144 are that they provide for and enable alternative and potentially more sustainable and cheaper servicing solutions. Establishing a process also brings certainty and transparency to alternative solutions.
Summary of costs	The policies do impose a process, which may potentially add

	cost in terms of delay and require specialist engineering input.
Effectiveness	The Policies are considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policies P143 and P144 are efficient in that it establishes a process for developing flexible infrastructure design solutions.
Appropriateness	The policies are appropriate in that it enables flexible, affordable, and quality infrastructure development.
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>The risk of acting is to cause delays in proposing alternative solutions.</p> <p>The risk of not acting is losing the opportunity for low impact and more sustainable solutions, or developers not proceeding as there is no guidance on other sustainable or affordable solutions.</p>

Quality urban design

<p>Policy P145 Promote subdivision and infrastructure development that demonstrates the New Zealand Urban Design Protocol qualities of good urban design.</p>	
<p>Relates to Objective/s: New Objective 41,</p>	
Comment	<p>The Wanganui District Council is a signatory to the New Zealand Urban Design Protocol, and is therefore committed to promoting good urban design outcomes.</p> <p>The Protocol contains the 7 C's of good urban design:</p> <p>Context Character Choice Connections Creativity Collaboration Crime Prevention Through Environmental Design (CPTED)</p> <p>Urban design processes are increasingly being recognised as good planning practice in creating liveable environments and is being implemented increasingly through statutory and non-statutory documents. Existing Council policy such as the Wanganui Urban Transport Strategy already incorporates the ideas and philosophies of the Protocol.</p>
Summary of benefits	<p>There are a range of benefits that can be attributed to good urban design. These include safer and liveable environments, energy efficient transport layouts, better engaged and connected communities, more choice, integrated landuses and infrastructure, low impact development, and increased</p>

	levels of amenity.
Summary of costs	The Policy is considered to be effective in that it is useful when assessing applications for subdivision and land use consents.
Effectiveness	The Policy is considered to be effective in that it is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P145 is efficient as it promotes quality urban development.
Appropriateness	The Policy is appropriate in that it promotes the qualities of good urban design.
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>The risk of acting is that the cost of developing allotments may increase and not meet the demands of the market. However, some development may be less expensive, or the market may lift to meet the price of a good quality product.</p> <p>The risk of not acting is that the urban areas of Wanganui do not reflect good urban design qualities and are not as liveable as could be anticipated.</p>

Low impact development

<p>Policy P146 Promote the integration of natural processes, including solar energy, landforms, land features, and overland flow paths into subdivision and infrastructure design and construction where appropriate.</p> <p>Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42</p>	
Comment	Policy P146 seeks to provide opportunities for subdivision and infrastructure development to incorporate more sustainable outcomes. This may include solar orientation to take advantage of the free heat energy from the sun, or incorporate natural overland flowpaths as both infrastructure and as a point of interest for amenity purposes, without the cost of construction associated with contemporary infrastructure. This policy is in addition to Policy P155 which promotes low impact approaches to earthworks and land development.
Summary of benefits	The benefits of Policy P146 are that developments can make the most of 'free' natural processes/resource to facilitate good and more sustainable outcomes from a subdivision development.
Summary of costs	In some instances lesser allotment yields may result from integrating natural processes.
Effectiveness	The Policy is considered to be effective in that is useful when

	assessing applications for subdivision and land use consents.
Efficiency	Policy P146 is efficient in that it enables the uses of natural processes to provide treatment for stormwater or potential energy sources.
Appropriateness	The Policy is appropriate in that it promotes the efficient use of natural resources, low impact development, and flexible infrastructure design.
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>The risk of action is that where reticulated services are provided they are not utilised.</p> <p>The risk of inaction is the creating of unnecessary reticulated infrastructure, missed opportunities around sustainable uses of free natural processes, and not enabling some land to be developed where there are capacity issues within the urban boundary.</p>

Crime Prevention Through Environmental Design (CPTED)

Policy P147 Consider the principles of Crime Prevention Through Environmental Design (CPTED) when incorporating public open space into subdivision including passive surveillance, definition of public and private spaces, and access management.

Relates to Objective/s: New Objective 40, New Objective 41,

Comment	This policy is consistent the New Zealand Urban Design Protocol, to which the Wanganui District Council is a signatory. The way in which public space is integrated into the private realm (and vice versa) can significantly affect the perception of safety. This is best addressed at the subdivision stage where suitable provisions can be applied to ensure a suitable interface and layout.
Summary of benefits	In particular, the policy provides for increased perceptions of safety and community vitality. Reduction in criminal activity.
Summary of costs	Costs potentially arising from the Policy include more time spent on the design process. Additional resource may be required for measures such as additional lighting or increased access widths for pedestrian access.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications and setting conditions for subdivision consents.
Efficiency	Policy P147 is efficient as the actions it requires is more affordably integrated at the subdivision stage.
Appropriateness	The Policy is appropriate as seeks to achieve safe and good quality subdivision.
Risk of acting or not acting if there is	The risk of acting is that designs may be

uncertain or insufficient information about the subject matter of the policies, rules, or other methods	of poor quality and contribute to crime or antisocial behaviour. The risk of not acting is that spaces are created that form or exacerbate antisocial or criminal behaviour.
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Site suitability

<p>Policy P148 Require subdivision creating additional allotments intended to support building development to provide safe and stable building platforms suitable for development.</p> <p>Engineered building platforms</p> <p>Policy P149 Avoid the creation of new residential allotments that require significant additional engineering works to provide for building development.</p> <p>Relates to Objective/s: New Objective 40</p>	
Comment	Historically the District Plan has been silent on what is expected from building platforms. Policy P148 sets down clear requirements. NZS 3604 2011 provides a basic standard for ground conditions for timber framed buildings, and therefore provided a useful reference point. Policy P149 supports P148 in that it wishes to prevent the creation of allotments that are complicated to build upon, or that require expensive and/or intricate engineering mitigation.
Summary of benefits	The benefits of Policy P148 is that allotments are made available that are easily developed and safe for residential land use. The benefits of Policy 149 are that sites that are complicated or unsafe to build upon are avoided.
Summary of costs	Some sites that are less suitable or complicated and/or expensive to build upon may no longer be able to be developed.
Effectiveness	The Policies are considered to be effective in that is useful when assessing applications and setting conditions for subdivision consents.
Efficiency	Policies P148 and P149 are efficient as suitable sites are identified early in the development process, as opposed to issues arising at the land use development stage.
Appropriateness	The Policies are appropriate as safe and suitable building conditions will be provided.
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	The risk of acting is that sites that can be built upon are removed from the market. The risk of not acting is the creation of uncertainty in terms of a suitable standard for allotments to build upon, the creation of unsuitable or unsafe building

	platforms, or requiring significant and expensive works to provide suitable ground conditions.
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Telecommunication, electricity and gas networks

<p>Policy P150 Ensure that applications for subdivision and intensified land use activities:</p> <p>a. Can achieve an appropriate level of service for Telecommunication, electricity and gas networks for that allotment and/or use prior to the granting of subdivision consent, AND</p> <p>b. That any specific technical requirements to achieve (a) are considered prior to the issue of a Certificate pursuant to Section 224 of the Resource Management Act.</p>
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Relates to Objective/s: Objective 17, New Objective 43

Comment	Network utilities are critical elements for the health, safety and prosperity for the community. Discussions with network utility operators have indicated that there is a need to determine available supply early in the process. In particular, where service upgrades are required to meet new demand. The policy assists in establishing the availability and any additional restrictions or requirements with regard to the connection and reticulation of network utilities early in the development process so that any requirements can be factored in by developers and network utility operators.
Summary of benefits	The benefits of Policy 150 are that it identifies prospective issues with the supply of network utility capacity early in the development process and encourages forward planning and joint approaches towards resolving any issues.
Summary of costs	The costs of Policy P150 may include any additional cost associated with any required upgrades to utilities by the developer where they are identified as being deficient in capacity to service a development.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P150 is efficient in that it is less costly and complicated to identify the needs for network utilities early in the development process.
Appropriateness	The Policy is appropriate as is ensures safe and quality urban environments.
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>The risks of acting may include the loss of development due to the identification of a lack of capacity in a utility.</p> <p>The risks or not acting may include a utility being compromised by additional development and failing.</p>

Springvale indicative Development Area

Policy P151 Require all subdivision and development to be generally in accordance with the provisions of the Springvale Indicative Future Development Area to proceed generally in accordance with the provisions of the Springvale Indicative Development Plan to ensure that:

- a. Stormwater is managed comprehensively and not in an ad-hoc manner;
- b. The transport network is consistent with the Wanganui Urban Transport Strategy, 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 design and located as shown on the Springvale Indicative Development Plan.

Conflict with Indicative Plan

Policy P152 Avoid development within the Springvale Indicative Future Development Area that:

- a. Is in conflict with the indicative transport layout and the stormwater management infrastructure, including ponding areas shown on the Springvale Indicative Development Plan;
- b. Results in ad-hoc, unconnected, and piecemeal infrastructure development.
- c. Proceeds in advance of a comprehensive plan for managing infrastructure in the Springvale Indicative Development Area.

Limited Development

Policy P153 Enable limited development within the area identified as within the Springvale Indicative Future Development Area that is zoned Rural B only where:

- a. It directly adjoins existing areas of residential density development and gains access directly or indirectly from Kelsi Street;
- b. Servicing capacity has been identified as sufficient to service the scale of the proposed development;
- c. The development is generally in accordance with the provisions of the Springvale Indicative Development Plan.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42,

Comment	Policies P151, P152 and P153 are complementary in that P151 sets minimum matters that must occur from development, P152 is about avoiding activities that will
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	<p>compromise outcomes in the Springvale Indicative Future Development Area, and P153 enables the continuation of existing development, but within specific parameters. Policy P151 sets down what is expected from all development in the area, P152 what is explicitly to be avoided, and P153 what is currently enabled.</p> <p>The project managing the potential for future development within the Springvale area has not yet been completed. Significant additional work around the identification, funding, and provision of infrastructure is still to be finalised. Therefore, development has not been generally enabled within the Springvale Indicative Future Development Area.</p> <p>However, it is recognised that there is currently small scale and incremental development within the Springvale Indicative Future Development Area that may be accommodated by existing infrastructure. Therefore, this development may continue where the matters in both policies are met.</p>
Summary of benefits	The main benefits from Policies P151, P152, and P153 are that extending existing development is enabled, but only to a degree that the outcome from any future development is not compromised and without committing Council to investing in significant infrastructure upgrades over and above what is already available.
Summary of costs	The costs associated with the Policies are the forgoing of potential development opportunities, and the cost of investigations to meet the requirements of P151, P152, and P 153.
Effectiveness	The Policies are considered to be effective in that it is useful when assessing applications for subdivision and land use consents.
Efficiency	Policies P151, P152, and P153 are efficient as they protect planned and potential infrastructure to service the Springvale Indicative Future Development Area.
Appropriateness	The Policies are appropriate in that they achieve quality and efficient infrastructure and protect future connectivity of services.
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>The risk of acting is that capital works to service the Springvale Indicative Development Area may not proceed.</p> <p>The risk of not acting is that development proceeds at a scale or a manner that compromises the ability of the servicing corridors in the Springvale Indicative Development Plan to be</p>

	implemented in the future.
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Springvale infrastructure allocation

Policy P154 Avoid any land use and/or subdivision development that allocates reticulated infrastructure intended to service the Springvale Indicative Future Development Area to other areas.

Relates to Objective/s: Objective 17, New Objective 40, New Objective 41, New Objective 42

Comment	Policy P154 is in addition to Policy P123 in that the Springvale Indicative Future Development Area is proposed to have specific infrastructure designed to meet the needs of the existing and future development area in Springvale, in particular a swale. This needs to be protected to enable the Springvale community to get the full benefit from it.	
Summary of benefits	The benefits of Policy P154 include certainty in investment and supply of infrastructure to the Springvale area.	
Summary of costs	Any perceived spare capacity may not be reallocated to other parts of the District which may be able to use it.	
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.	
Efficiency	Policy 154 is efficient as it protects planned and potential infrastructure to service the Springvale Indicative Future Development Area.	
Appropriateness	The Policy is appropriate in that it protects the serviceability for the area and protects infrastructure investment.	
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	The risk of acting is some development may be prevented.	The risk of not acting is capacity is used for other areas or activities not anticipated and additional investment is required to serve the Springvale area.

Low impact earthworks and land modification

Policy P155 Promote low impact earthworks and land modification that results in minimal modification to landforms and overland flow paths.

Relates to Objective/s: New Objective 40, New Objective 41, New Objective 45

Comment	There have been issues in the recent past around the effects of poorly managed earthworks and land modification. Policy P155 addresses this in part, and also follows emerging best practice around minimising the amount of works and integrating natural features and processes into development. This policy is in addition to P146, which also promotes low impact approaches to infrastructure and subdivision development.	
Summary of benefits	The benefits of Policy P155 are that natural systems can be	

	retained, the cost of development may be reduced through the use of those natural systems, and a reduction in the cost arising from minimising the need for earthworks.
Summary of costs	The potential cost from Policy P155 may be a reduced lot yield from subdivision, However, this may not necessarily be the case.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P155 is efficient as it minimises the amount of earthworks required for subdivision and land development.
Appropriateness	The policy is appropriate in that it achieves low impact development and earthworks.
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>The risk of acting is low in that it requires less work from developers. However, where allotment yields are reduced, there may be less incentive to develop.</p> <p>The risks of not acting are also adding additional costs to subdivision development by requiring significant earthworks. Further to this, additional capital expenditure may be required to be replicated or address changes to natural processes such as overland flows.</p>

Effects of earthworks

Policy P156 Avoid earthworks and land modification that results in damage to property, network utilities or significant nuisance effects.	
Relates to Objective/s: New Objective 40, New Objective 41, New Objective 45	
Comment	Earthworks and land modification have the potential to create a range of property damage, damage to network utilities (above and below ground) and nuisance effects. These have occurred within the urban areas of Wanganui in the recent past. Policy P156 seeks to avoid the more significant effects of earthworks, as, in many instances, earthworks may be necessary. Included in the Plan is a reference to NZS 6803: 1999, a National Standard around appropriate management of noise associated with earthworks and land modification.
Summary of benefits	The benefits of Policy P156 are that earthworks are still provided for, but damage to third parties property and the creation of significant nuisance effects are avoided.
Summary of costs	The likely costs of Policy P156 are potentially investing in new practices to manage the effects arising from earthworks.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P156 is efficient as it provides a means to manage

	effects before they arise.
Appropriateness	The policy is appropriate in that it achieves low impact development and earthworks.
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>The risk of acting is that additional costs are added to development.</p> <p>The risk of not acting include ambiguity over what is expected from works, enforcement can only be taken after the fact, further loss of amenity and/or property.</p>

Maori values and earthworks

<p>Policy P157 Enable the incorporation of Maori cultural values and practices into large scale earthworks and land modification, and within areas of cultural significance.</p> <p>Relates to Objective/s: Objective O4, New Objective 40, New Objective 41, New Objective 44 and New Objective 45</p>	
Comment	Policy P157 seeks to enable Maori and Maori cultural values and practices to be provided for where large scale earthworks are proposed, particularly in areas that are likely to be sensitive.
Summary of benefits	The benefits of Policy P157 are that Maori are enabled to practice their traditional beliefs and become more involved with the resource management process. It is also possible that unknown archaeological sites may be identified prior to works beginning, therefore minimising any delay that may arise from gaining archaeological authority.
Summary of costs	There is potential for delays for development in more sensitive areas.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy P157 is efficient as it provides a means to manage effects before they arise.
Appropriateness	The Policy is appropriate in that Maori cultural values are recognised.
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>The risk of acting is that areas more likely to be sensitive to development are avoided by perception as opposed to any identified issue.</p> <p>The risk of not acting is that the matters in Part II of the Resource Management Act regarding Maori are not adequately addressed, and sites of significance and Maori beliefs and practices are compromised.</p>

Cultural Heritage and Development

PXX1	Ensure subdivision, infrastructure and earthworks are respectful of historic and cultural heritage, including archaeological sites.
PXX2	Promote Historic Heritage Promote the Identification and protection of areas and values relating to historic heritage, including archaeological sites.
PXX3	Identification and Protection of Historic Heritage Ensure subdivision, infrastructure and earthworks recognise and provide for the identification and protection of historic heritage, including archaeological sites
Relates to Objective/s: New Objective 40, New Objective 41, New Objective 45	
Comment	Policies PXX1, PXX2, and PXX3 collectively seek to identify, promote, protect, and appropriately manage cultural heritage sites, items and values. These are seen as complementary to the provisions of the Historic Places Act and powers given to the Historic Places Trust.
Summary of benefits	The provisions that a collaborative approach is undertaken in order to assess, identify and manage cultural heritage sites, items and values.
Summary of costs	Given that assessments are required on discovery of archaeological sites which, apart from built heritage, require assessment through the provisions of the Historic Places Act, any additional costs are not likely to be significant.
Effectiveness	The policies will address the requirements of Objective O40.
Efficiency	The proposals are efficient as they identify suitable issues at the beginning of the process rather than relying on a reactive approach after the grant of consent.
Appropriateness	The policies are appropriate in that they provide for the social and cultural wellbeing of the community.
Risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the policies, rules, or other methods	While the provisions are closely aligned with those of the Historic Places Act, the provisions assist in finding measures to protect sites of significant heritage elements. The risk of not acting is that the risk of damage through accidental discovery is increased.

Subdivision, Use and Development within Transmission Line Corridors

PXX5	To provide for subdivision, use and development within electricity transmission corridors located within the Residential and Rural B Zones that achieve the following: (a). Does not compromise the safe and efficient operation, maintenance and upgrading of the transmission network, including by:
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- i. Ensuring security of supply and integrity of transmission assets;
- ii. not compromising existing access to conductors and support structures for maintenance and upgrading works;
- iii. Not foreclosing operation and maintenance options, or the carrying out of planned upgrade works.
- iv. Preventing new incompatible built development in close proximity to the support structures and/or under the area of conductor swing during every day wind.
- v. Enabling the alteration to and/or extension of existing development already under the area of conductor swing during every day wind where any restrictions or impediments created by that existing development are not further compromised.

(b) Ensure electrical safe distances are maintained.

(c) Manages sensitive activities to avoid exposure to risk and minimise exposure to nuisance and to avoid, remedy or mitigate adverse effects on amenity. Where built development already exists under a particular line span or around an electrical substation, enables additions and/or expansions to such development only where this does not increase, or where it reduces the existing degree of risk or exposure to nuisance and where amenity is maintained or enhanced.

(d) to assist in achieving (a) – (c) above, and to facilitate good amenity and urban design outcomes, takes the proximity of transmission assets into account at the design stage of subdivision including whereby:

- i. the ability to maintain and inspect transmission assets is protected, including ensuring for access;

- ii. The potential intensity of incompatible development under and in close proximity to a line is minimised and measures are taken to prevent building within the area of conductor swing during every day wind, including that:

- a. A suitable building platform and, where appropriate, curtilage area is identified on each new developable lot, having regard to the range of activities that are likely to be subsequently established; and

- b. Measures are taken to prevent building within the area of conductor swing during every day wind

- iii. A good level of amenity is achievable.

Relates to Objective/s: OX1.

Comment

The Policy seeks to, in part, give effect to the provisions of the National Policy Statement on Electricity Transmission.,

	which Council is required to 'give effect to'. Its focus is on managing the existing transmission lines of the National Grid. The objective seeks to protect the network from reverse sensitivity and enable ongoing use, operation and maintenance.
Summary of benefits	The Policy goes partway to ensuring Council complies with the NPSET. More importantly, it protects the long term sustainability of the Nation Grid from incompatible uses, thereby maintaining, social and economic wellbeing and health and safety of the wider community.
Summary of costs	The main result will be the possibility that buildable areas on sites within a transmission corridor will be reduced.
Effectiveness	The Policy is considered to be effective in that is useful when assessing applications for subdivision and land use consents.
Efficiency	Policy PXX5 is efficient as it provides a means to manage effects before they arise.
Appropriateness	The Policy is appropriate in that it gives effect to the NPSET and manages the effects of non-compatible activities on the national grid.
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>The risk of acting is that additional costs are added to development and there is a reduction in land available on some properties to develop.</p> <p>The risk of not acting could be that activities occur that have the potential to affect the ability of the grid to operate and be maintained, leading to supply failures.</p>

Proposed Rules

Subdivision and Infrastructure

The following methods have been identified as being suitable for achieving the relevant objectives and policies for the Residential Phase of the Plan Review.

Rules

The following outlines proposed changes to rules for Subdivision. Some of the rules will remain unchanged. These rules have proven to be effective in the past in achieving the relevant objectives and policies and it is anticipated that they will continue to do so in the future.

Controlled Activities - Rules

R260 Controlled Activities:	
The following are controlled activities in all zones:	
<ul style="list-style-type: none"> a. Boundary adjustments, subject to meeting the Performance Standards for the relevant zone. b. Conversion of cross lease allotments to freehold. 	
Council retains control over following matters:	
<ul style="list-style-type: none"> 1. The extent to which the amenity values of the surrounding areas are affected and compliance with the general subdivision Standards. 	
Note: Applications subject to this rule shall be considered without service, public notification or written approvals from affected persons.	
Comment	Rule R260 specifies that activities provided for as a controlled activity but that fail to meet one or more of the performance standards, will be considered as a Discretionary Activity. This rule differs considerably from the Operative District Plan in that all subdivision was a Controlled Activity.
Summary of benefits	Simple and uncomplicated process for low risk activities.
Summary of Costs	Limited scope for managing unusual or out of the ordinary applications that fall under the Rule.
Effectiveness	Rule R260 is effective and enables applications to be measured against the specific expectations outlined by the Plan.
Efficiency	Rule R260 is efficient as it clearly outlines the requirements, with minimal scope which applicants have to address.
Appropriateness	The rule is considered to be appropriate as it meets the basic requirements set down by the Objectives and Policies.

Restricted Discretionary Activities – Rules

<p>R261</p>	<p>Restricted Discretionary Activities: The following are restricted discretionary activities:</p> <p>a. Subdivision in the Residential Zone, Rural B Zone, Neighborhood Commercial Zone, and Reserves and Open Space Zone unless otherwise stated.</p> <p>Council restricts its discretion to the following matters:</p> <ol style="list-style-type: none"> 1. the ability of a proposal to comply with the relevant Subdivision and Infrastructure Performance Standards, Policies. 2. the ability of the proposal to meet the relevant General Urban Design Criteria, Subdivision General and Infrastructure Assessment and performance Criteria. <p>Note: Applications subject to this rule shall be considered without service, public notification or written approvals from affected persons.</p>
<p>Comment</p>	<p>Rule R261 specifies that subdivision, other than boundary adjustments and conversions from cross lease to freehold titles, are provided for as a Restricted Discretionary activity, subject to meeting the relevant performance standards. This rule differs considerably from the Operative District Plan, which provided for most subdivision, as a Controlled Activity.</p>
<p>Summary of benefits</p>	<p>The benefits of Rule R261 Include:</p> <ul style="list-style-type: none"> • Limited and more specific scope of matters to be addressed. • Flexibility in terms of outcomes for the developer and Council. • Retention of a process where no third parties or notification is required. • Conditions may be imposed to ensure outcomes are in specific areas. • Inappropriate applications that can not be amended to avoid significant adverse effects on the environment can be declined.
<p>Summary of Costs</p>	<p>The potential costs of Rule R261 include:</p> <ul style="list-style-type: none"> • A slight increase in uncertainty. • Applications may be declined.
<p>Effectiveness</p>	<p>Rule R261 is effective as it provides the scope through the activity status, associated standards and assessment criteria, and the built in flexibility to meet the outcomes desired by the Objectives and Policies of the Plan.</p>
<p>Efficiency</p>	<p>Rule R261 is efficient in that a consent is required as stipulated by the RMA, and the scope and matters which are required to be addressed are restricted.</p>

Appropriateness	The rule is considered to be appropriate as the range of matters desired by the Objectives and Policies of the Plan can be achieved.
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Discretionary Activities – Rules

R262 Discretionary Activities:	
<p>The following are discretionary activities:</p> <ul style="list-style-type: none"> a. Any subdivision or infrastructure development that results in non-compliance with any Performance Standard or Standards unless otherwise stated. b. Subdivision within the Springvale Indicative Future Development Area, including boundary adjustments; in general accordance with the key infrastructure linkages and indicative roading layout, detailed in the Springvale Indicative Development Plan that gains access from Kelsi Street. c. Subdivision in the Residential Zone that does not meet the minimum net allotment size of 450m². d. Subdivision in Otamatea Development overlay that does not meet the minimum net allotment size of 1000m². 	
Comment	<p>Given the Restricted Discretionary activity status for subdivision, failure to comply with any Performance Standards has been made a Discretionary Activity.</p> <p>It is noted that there is an existing area of development within the Springvale Indicative Future Development Area. This has been determined to be of small scale and can have any risk managed through consent. This has been accommodated.</p> <p>Rule R262 also identifies the status of subdivision where they fail to meet the minimum net allotment area in the Residential and Otamatea Development Overlay.</p>
Summary of benefits	<p>The benefits of Rule R262 Include:</p> <ul style="list-style-type: none"> • Existing development is enabled. • Flexibility in terms of outcomes for the developer and Council. • Conditions may be imposed to ensure outcomes are specific areas. • Inappropriate applications that can not be amended to avoid significant adverse effects on the environment can be declined. • Development density can be increased where an infrastructure catchment can accommodate development.
Summary of Costs	<p>The costs of Rule R262 Include:</p>

	<ul style="list-style-type: none"> • Higher consenting requirements in terms of information and cost. • No certainty in terms of outcome.
Effectiveness	Rule R262 is considered effective as it directly manages the matters that the Objectives and Policies seek, particularly in sending the message through statute that those activities are not desirable.
Efficiency	Rule R262 is efficient as it enables existing development, and provides for additional development density where systems or solutions allow.
Appropriateness	The Rule is appropriate as it manages the infrastructure allocations, and assists in promoting the optimal use of infrastructure.

Non-Complying Activities – Rules

R263	<p>Non-Complying Activities:</p> <p>The following are non-complying activities:</p> <ol style="list-style-type: none"> All other subdivision in addition to R262(b) in the Springvale Indicative Future Development Area. Subdivision in the Rural B Zone, excluding allotments within the Springvale Indicative Development Area that proposes to connect to or extend reticulated infrastructure including water, wastewater, and piped stormwater drains. Any subdivision or development that fails to comply with any Performance Standard and is not specified as provided for as discretionary activities.
Comment	<p>There are three parts to R263, the Springvale Indicative Future Development Area, subdivision in the Rural B Area and non-compliance with specific Standards.</p> <p>The Springvale Indicative Future Development Area has much complexity involved with the provision of services. While a draft Springvale Structure Plan has been developed, this has not been discussed with the public, or adopted by Council. In particular, there are significant capital works required. However, there is funding set aside for the development of the drainage swale and extending Fitzherbert Avenue. This investment can be compromised by the provisions in the Operative District Plan, where there is no development density requirement.</p> <p>In addition, the costs of servicing and extending new infrastructure in a low growth environment, with a low 'pipe to property' ratio, and over such a broad area are not sustainable, particularly where servicing can be achieved on-</p>

	site.
Summary of benefits	The benefits of Rule R263 Include: <ul style="list-style-type: none"> • An application would need to pass stringent tests to be granted. • Inappropriate applications that can not be amended to avoid significant adverse effects on the environment can be declined. • A clear message is sent that the types of activities proposed are generally not appropriate.
Summary of Costs	The cost of Rule R263 is that areas that may have been developed previously may be delayed until servicing is provided, or, in the case of the Rural B Zone, not to the density it may have been previously.
Effectiveness	Rule R263 is effective as it provide a clear Rule at an appropriate level of activity status to address the most high risk applications.
Efficiency	With regard to efficiency, R263 is efficient as it is unambiguous and sends a clear message that it is likely that applications that fall under this Rule are not expected to occur.
Appropriateness	Rule R263 is appropriate as it ensures a compact and affordable urban area with regard to infrastructure, and protects investment in infrastructure and allocations of infrastructure servicing and spending.

Subdivision and Infrastructure Standards

	<ul style="list-style-type: none"> - Subdivision <ul style="list-style-type: none"> • Utilities • Transportation • National Environmental Standards • Subdivision Engineering Basis • Allotment adjustments, easements and sizes • Allotment Suitability • Allotment Serviceability • Network Utilities • Subdivision Earthworks • Allotment Access - Infrastructure <ul style="list-style-type: none"> • Servicing capacity • Alternative Solutions • Catchment Management basis • Transport • Stormwater, Water and Wastewater
Comment	The subdivision standards include all the fundamental requirements to ensure that allotments are fit for purpose and comply with national level regulatory requirements. This includes servicing with regard to Council reticulated services, telecommunications and other services, suitable conditions to

	enable anticipated building development, and safe and suitable vehicle access.
Summary of benefits	The benefits Include: <ul style="list-style-type: none"> • Explicit requirements for compliance, giving certainty. • Promotion of identified flexibility. • Enable alternative solutions • Safe, serviceable and suitable allotments are created.
Summary of Costs	Additional level of information required from applicants
Effectiveness	Each of the standards give effect to the Objectives and Policies of the Plan. In particular with regard to addressing known deficiencies in information regarding the capacity in council's reticulated services, providing flexibility and improving subdivision quality.
Efficiency	The standards are efficient as they are unambiguous and send a clear message in terms of what is required.
Appropriateness	The standards are appropriate as they ensure a compact and affordable urban area with regard to infrastructure, and protect investment in infrastructure and allocations of infrastructure servicing and spending.

CONCLUSION

None of the methods will singularly achieve the objectives and policies but rules clearly are the most appropriate in establishing controls to manage the adverse effects of activities reviewed as part of Phase Two of the District Plan review. A combination of the rules and non-regulatory method is likely to contribute to the control of adverse effects of activities.

Earthworks

The following methods have been identified as being suitable for achieving the relevant objectives and policies for the Residential Phase of the Plan Review.

Rules

The following outlines propose changes to rules for earthworks. The District Plan has previously been silent on land use rules for earthworks and land modification. Therefore, all of the provisions are new to the Plan.

Permitted Activities – Rules

R274 Permitted Activities:

The following are Permitted Activities:

- a. Earthworks in the Residential, Rural B, Neighbourhood Commercial and Reserves and Open space Zones, subject to meeting the Performance Standards.
- b. Earthworks required for piling, road maintenance or widening, trenching and back filling ancillary to the installation of network utilities and connections to water services.
- c. Earthworks for the establishment of water and effluent tanks, effluent disposal fields, domestic gardening and landscaping subject to the finished ground levels remaining the same.

Note: Works in close proximity to any electricity line or support structure can be dangerous. The Electrical Code of Practice for Electrical Safe Distances 34 : 2001 may apply and should be referred to. This Code is enforced by the Ministry of Economic Development, and compliance is mandatory.

Comment	The presumption in Rule R274 is that all earthworks are initially permitted, and will therefore not require consent. However, this is subject to compliance with a range of Performance Standards. Specifically, matters such as domestic gardening and infrastructure are permitted also, but in some instances will not have the same range of Performance Standards to comply with.
Benefits	The benefits of Rule R274 Include: <ul style="list-style-type: none"> • Rule R274 is enabling, but does address key issues where necessary. • Provides control through Performance Standards as opposed to Rules.
Costs	Some activities will require resource consent where they do not comply with specific standards.
Effectiveness	Rule R274 is considered effective as it clearly articulates the expectations of the Plan.
Efficiency	The provision is efficient as it provides for good general information. In addition, no changes or additional

	requirements to the NES are proposed.
Appropriateness	Rule R274 is appropriate in that it meets provisions set above the District Plan.

Restricted Discretionary Activities – Rule

R275 Restricted Discretionary Activities:

The following are restricted discretionary activities:

- a. Earthworks in the Residential Zone and Rural B Zone that do not comply with a Performance Standard unless otherwise stated.

Council restricts its discretion to the following matters:

1. Discretion will be restricted to the ability of a proposal to meet all the relevant Policies, Performance Standards and Assessment Criteria.

Comment	Rule R275 generally applies to all Performance Standards except where there are effects on reticulated infrastructure. Given that the non-compliance may be specific, or within specific areas Restricted Discretionary as an activity status was considered appropriate.
Summary of benefits	The benefits of Rule R275 Include: <ul style="list-style-type: none"> • Limited and more specific scope of matters to be addressed. • Flexibility in terms of outcomes for the developer and Council. • Retention of a process where third parties or notification is still an option where the proposal requires it. • Conditions may be imposed to ensure outcomes are specific areas. • Inappropriate applications that can not be amended to avoid significant adverse effects on the environment can be declined.
Summary of Costs	The benefits of Rule R275 Include: <ul style="list-style-type: none"> • Limited and more specific scope of matters to be addressed. • Inappropriate applications can be declined.
Effectiveness	Rule R275 is considered effective as it enables specific areas of concern to be addressed, particularly where identified by key policies in the Plan.
Efficiency	Rule R275 is considered efficient as discretion in assessing and setting conditions is restricted to matters of non-compliance.
Appropriateness	The rule is considered to be appropriate as it promotes low impact and safe development as a result of earthworks as anticipated by the Objectives and Policies of the Plan.

Non-Complying Activities - Rule

R276 Non-Complying Activities:

The following activities are non-complying activities:

- a. Earthworks that do not comply with a Performance Standard or Standards that specifically states failure to meet that standard is a Non-Complying Activity.

Note: Quarrying is excluded from the provisions of this section.

Comment	There is only one Performance Standard to which Rule R276 relates. This refers to the discharge or materials either on to, or in to, infrastructure.
Summary of benefits	The provision protects infrastructure from damage by poorly controlled earthworks, and provides a tool for enforcement. Rule R276 also places trust in those who are carrying out works in the first instance that compliance will be achieved without first requiring consent.
Summary of Costs	Rule R276 may require additional mitigation works are required to ensure that, as a result of works, earthworks do not damage infrastructure.
Effectiveness	The provision is effective in protecting infrastructure in that there is a rule that is enforceable.
Efficiency	Rule R276 is efficient as it allows development to proceed without consent, until such time as an issue evolves.
Appropriateness	Rule R276 is appropriate as it protects the effectiveness of infrastructure from the adverse effects of inappropriate activities.

Earthworks Standards

<p>- Earthworks</p> <ul style="list-style-type: none"> • Scale of works • Earthworks Standards 	
Comment	The provisions are the first time earthworks have been regulated in the District Plan where as in the past the way earthworks were treated was ambiguous. This has been done for various reasons including for the promotion of low impact development. These are some basic requirements for earthworks based around risk management.
Summary of benefits	The benefits of the standard are that clear benchmarks are put down in terms of expectations, removing ambiguity. There are also benefits regarding the health and safety of people and property.
Summary of Costs	Some activities that were previously unregulated are now required to apply for consent and may require expert input in

	order to prove their safety and suitability.
Effectiveness	Each of the standards gives effect to the Objectives and Policies of the Plan. In particular with regard to addressing known deficiencies in information regarding the capacity in council's reticulated services, providing flexibility and improving subdivision quality.
Efficiency	The standards are efficient as they are unambiguous and send a clear message in terms of what is required.
Appropriateness	The provisions are appropriate in that they ensure the health and safety of the community are maintained from inappropriate and poorly planned/managed earthworks.