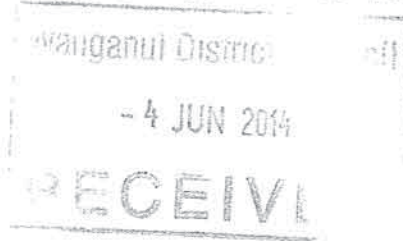


SCANNED



FORM 5

SUBMISSION ON A PUBLICLY NOTIFIED PROPOSAL FOR POLICY STATEMENT OR PLAN UNDER CLAUSE 6 OF THE FIRST SCHEDULE, RESOURCE MANAGEMENT ACT 1991

To: Wanganui District Council

Submission on: Proposed District Plan Changes 36 & 37

Name of submitter: New Zealand Fire Service Commission (the NZFS Commission)

Address for service: C/- Beca Group Ltd
PO Box 3942
WELLINGTON 6140

Attention: Alexandra Strawbridge

Phone: 04 550 5995

Email: alexandra.strawbridge@beca.com

This is a submission on Proposed Plan Changes 36 & 37 to the Wanganui District Plan.

The NZFS Commission is not a Trade Competitor to this Proposal.

The specific parts of the Proposed Plan that the NZFS Commission's submission relates to are:

- Aspects of the Proposed Plan that may impact on the operations of the NZFS Commission, including the provision of sufficient water supply for firefighting purposes, and physical access for fire appliances.

Background:

In achieving the sustainable management of natural and physical resources under the RMA 1991, decision makers must have regard to the health and safety of people and communities. Furthermore, there is a duty to avoid, remedy or mitigate actual and potential adverse effects on the environment. The NZFS Commission has a responsibility under the Fire Service Act 1975 to provide for firefighting activities in a safe, effective and efficient manner. As such, the NZFS Commission monitors development occurring under the RMA 1991 to ensure that, where necessary, a submission is made which promotes the consideration of fire safety.

The NZFS Commission's main areas of concern are the provision of a water supply and access to enable the New Zealand Fire Service (NZFS) to operate effectively and efficiently. In order to achieve this, the NZFS Commission seeks compliance with the New Zealand Standard for the provision of firefighting water supply and access, known as the *New Zealand Fire Service*



Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008 (the NZFS Code). The NZFS Code sets out standards for water supply and access design which meet the operational requirements of the NZFS for both reticulated and non-reticulated areas.

The NZFS Commission has been involved in the Wanganui District Plan Review process, as a submitter on Plan Change 27 – Subdivision, Earthworks and Infrastructure. The NZFS Commission was largely in support of the proposed provisions for the Subdivision and Infrastructure chapter. In particular it supported the requirements for lots with a connection to the reticulated water network to comply with the NZFS Code, or the ability to comply with the NZFS Code for sites without reticulated water supply. The NZFS Commission has appreciated the Council's positive position towards providing for the operational needs of the NZFS across the District with the aim of assisting the NZFS in responding to structural fire emergencies effectively and efficiently.

In this submission, the NZFS Commission raises some remaining concerns relating to the provision of adequate fire fighting water supplies in areas that cannot be connected to a reticulated water network. These concerns and requested actions are set out in detail in the sections below.

The NZFS Commission's submission is:

The specific amendments, additions or retentions sought are outlined below

1. Provision of adequate firefighting water supply in remaining Rural Zones at the point of subdivision

In its submission on Plan Change 27, the NZFS Commission supported what is now Rule 11.5.7 – Site Serviceability. This Rule requires all new allotments to connect to reticulated water services excluding the Rural B Zone which shall demonstrate the ability to comply with the NZFS Code.

In its original submission on Plan Change 27, the NZFS Commission requested that this rule be made applicable to all the Rural Zones to ensure that all non-reticulated development considers compliance with the NZFS Code at the point of subdivision. After subsequent discussions with the Council, the NZFS Commission understood that this addition would be dealt with under the Plan Change that addresses the Rural Zone (i.e. Plan Change 36).

Upon review of Plan Change 36, it does not appear that these changes have been proposed. The NZFS Commission therefore requests that the remaining Rural Zones be added to Rule 11.5.7, being Rural A, Rural C and Rural Settlement. The NZFS Commission considers that requiring all non-reticulated subdivision to demonstrate the ability to comply with the NZFS Code would provide a consistent approach (rather than this only being required for subdivision in the Rural B Zone). This approach is

especially relevant, as it is noted that, under proposed Policy 3.3.2, the Council is not considering extending urban reticulated infrastructure to any new allotments within these Zones.

The NZFS Commission therefore requests that additions be made to the following provision of the District Plan:

- Proposed Plan Change 36: Rural – Chapter 11: Subdivision and Infrastructure – 11.5: Performance Standards-Subdivision - Rule 11.5.6: Site serviceability:

"a. Each new allotment shall connect to reticulated water services (sewer, stormwater and water supply) excluding the Rural A, Rural B, Rural C and Rural Settlement zones which shall be required to demonstrate it can provide those services within the proposed allotment.

...

d. For sites in the Rural A, Rural B, Rural C and Rural Settlement zones applications shall:

i. Provide secure suitable non-reticulated levels of service for potable water supply.

ii. Demonstrate the ability to comply with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008."

2. Provision of adequate firefighting water supply to developments that do not involve subdivision

With the addition of the requested additions above, the NZFS Commission is satisfied that its operational requirements will be considered in all areas of the District at the point of subdivision.

However, the NZFS Commission is also concerned with development that may take place separately to the subdivision process in areas of the District with no connection to a reticulated water supply. This includes the construction of dwellings and other commercial and industrial structures with a high occupancy (but excluding uninhabitable rural farm and horticultural structures etc.) that may take place in the Rural Environment (the NZFS Code can be applied to all these types of structural development).

While the NZFS Commission is concerned with all new development in non-reticulated areas, the type of development allowed through Plan Change 37 (Papakainga) is an example of a situation where potentially extensive development could take place which is not caught under Rule 11.5.6 (above). These types of development (as well as other non-reticulated development) are therefore not currently required to demonstrate the ability to comply with the NZFS Code.

The NZFS Commission is not opposed to Plan Change 37 to allow for Papakainga developments; however, in order to promote the protection of lives, property and the surrounding environment, it requests that additions be made to the following proposed provisions of the Rural Environment chapter:

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.5 Performance Standards (*Rural A Zone*) – 3.5.5 Structures:

(e) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.7 Performance Standards (*Rural B Zone*):

3.7.8 Structures:

(a) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.9 Performance Standards (*Rural C Zone*) – 3.9.5 Structures:

(e) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.

- Proposed Plan Change 36: Rural – Chapter 3: Rural Environment – 3.11 Performance Standards (*Rural Settlement Zone*) – 3.11.5 Structures:

(j) All new habitable structures to be used for residential, commercial or industrial purposes shall be provided with a fire fighting water supply and access to this supply in accordance with New Zealand Fire Service Fire Fighting Water Supplies Code of Practice 2008 SNZ PAS 4509:2008.

The NZFS Commission understands that, while the intention of Plan Change 37 is to make Papakainga development more allowable, the development is still required to comply with the Performance Standards of the relevant zone. Where these developments are to be located within any Rural Zone, the NZFS Commission then understands that the rules referred to above would still apply to Papakainga development.

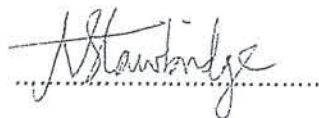
The NZFS Commission seeks the following decision from the consent authority:

That, if Proposed Plan Change 36 is approved, the above additions requested by the NZFS Commission be included in the final wording (which would also address the concerns of the NZFS Commission relating to Plan Change 37).

The NZFS Commission has qualified staff, experienced in all aspects of this submission, and would be happy to assist and/or advise in any way possible.

The NZFS Commission wishes to be heard in support of their submission.

The NZFS Commission is not prepared to consider presenting a joint case at the hearing.



*(Signature of person authorised to
sign on behalf of New Zealand Fire
Service)*

3/6/14

Date

SCANNED 69



Resource Management Act 1991
Submission on a Publicly Notified Plan Change
To The Wanganui District Plan

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



4 JUN 2014
RECEIVED

TO: Wanganui District Council, PO Box 637, Wanganui

Name: (print in full) Ridgway Trust

This is a submission on Plan Change No. 36 to the Wanganui District Plan.

Closing Date: 04/06/14

- (a) I could/~~could not~~ gain an advantage in trade competition through this submission. (*please delete one).
- (b) I ~~am~~/am not* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:

Restrictions on subdivision of titles on land of Class 1 and Class 2 soil as specified.

The proposed 'set-back' provisions for trees

Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

As attached, and summarized within

Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

Attached

Use additional pages if required

5. I do/~~do not~~ wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I ~~will~~/would not* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:

C/- A. R. Taylor
28 Bluekin Road
R.D. 1

Signature: [Signature]

(Person making submission or person authorised to sign on

Day time phone No: 027-348-9684 (behalf of person making submission)

Email: ridgway@inspire.net.nz Date: 03-06-2014

Alternatively you can collect a submission form from the Customer Services Desk at the Wanganui District Council, 101 Guyton Street, the public libraries, or online at www.wanganui.govt.nz/shaping

08/10/1928

RIDGWAY TRUST



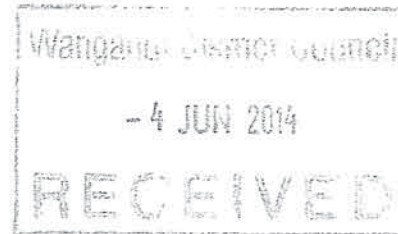
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c/- A&B Taylor
28 Blueskin Road
RD 1, Wanganui, 4571
New Zealand

Phone: 027 348 9684
Email: ridgway@inspire.net.nz

2 June 2014

Kevin Ross
Wanganui District Council
PO Box 637
Wanganui 4540



Submission on Proposed Plan Change 36 – Rural Zones

Ridgway Trust (“The Trust”) is grateful for the opportunity to submit its comments on Proposed Plan Change 36 – Rural Zones, Wanganui District Council (“PPC 36”).

The Trust strongly supports PPC 36, but asks for minor modifications.

The Trust is a family operated, medium scale, cropping and livestock business with a turnover in excess of \$500,000. 90 percent of its operation is conducted within Wanganui District and 80 percent of the land it operates on lies within the boundaries of the proposed changes linked to Class 1 and Class 2 soils. We are subject to PPC 36.

The Resource

Wanganui’s land resource is largely rolling-to-steep in topographical terms with most of its soils being of moderate to low fertility. There are, however, inliers of high quality (Class 1 and Class 2) soils. These comprise just two percent of the total. Wanganui District is blessed with a temperate climate suitable for growing a wide range of food and fibre. The combination of this climatic regime and these high quality soil types is unusual in New Zealand.

History

The Trust (and its family forbears) has farmed land affected by PPC 36 since European agriculture began in Wanganui in the 1840s. This land is recognised as being particularly fertile, possessing excellent natural drainage, and with sound soil structural properties. Indeed, wheat was grown on, and even exported from, these soils before its potential in Canterbury was evident.

While the inevitable trend is for good soil resources to shrink as humans construct buildings over them and otherwise degrade them, the last half century has witnessed an acceleration of this. Objective analysis of this trend over the past two decades in the Westmere area demonstrates that

the trend toward more subdivision and increased housing density is exponentially accelerating the loss of this resource to productive agriculture (see *Wanganui's Agricultural Economy*, below).

The Wanganui Economy

Wanganui is not faring well economically by national standards. Wanganui District Council (WDC) is aware that opportunities must be capitalised upon to improve the District's wealth. Wealth is based on the interaction of resources. Wanganui's economic wealth will be linked to the way in which its human and physical resources combine to produce exportable value. This process is not entirely land dependant but for Wanganui much of it will be.

Currently, 15 to 20 percent of Wanganui's Gross Domestic Product (GDP) is derived from our agricultural resources and the potential for the largest increases in this lies with better use of, and more intensive and valuable production from, our best soils. The Wanganui Rural Community Board, supported by WDC, has shown faith in this concept through the initiation and progressive support of the Rural Enterprise Project (see Wanganui Rural Community Board submission to PPC 36).

This is where a large part of the untapped wealth of Wanganui District lies.

Why is Proposed Plan Change 36 essential?

1) *Wanganui's Agricultural Economy*

John Dymond (Landcare Research senior scientist) has warned against further fragmentation of rural landholdings (p.13, *The New Zealand Farmers Weekly*, February 4, 2013). "Fully one-tenth of New Zealand's most productive land has already been converted to lifestyle sections and this has increased rapidly in the last 10 years." This trend is acknowledged in the Wanganui District Council study of the Westmere case (2014).

Dymond goes on to say "Smallholders overall did not engage in high levels of production...Once subdivided, the land was generally unlikely to return to economic food production." Dymond's thesis is that the smaller lots become, the less productive they tend to be. As counterintuitive as that may seem, his case is supported by empirical analysis. He further notes that New Zealand is losing more good land to rural subdivision than to urbanisation.

There is no reason to suggest that Wanganui has bucked this trend. In fact, information supplied by planning professionals suggests that these effects are more severe here (WDC DP Review Phase 5, 2.2.1. Background Research).

There is abundant observational and anecdotal evidence of the negative impact of rural subdivision on our good soils.

Abandoned orchards, empty fields and unused buildings are present within the Class 1 and Class 2 soils area subject to PPC 36. These observations are not exclusive to smallholdings but tend to be more frequent among them. Because of the capital locked up and suspected legal complexities, their return to productive use is unlikely or slow. Investment in very small-scale agricultural ventures is risky because of market volatility. Holdings as small as the current District Plan permits lack the flexibility to expand or diversify with the support of adjacent land (hence the abandoned properties evident). This harks back to the counterintuitive thought that the smaller one gets, the more intensive operations become and hence the more profitable. The capital/asset base is often just not

there. The Rural Enterprise Project ('The Wanganui Economy', above) proposes that landholders would commit a fraction of their property to such intensive production at first; growing with the project's success. Committing wholly within smallholdings carries a high risk that too often results in failure.

Reverse sensitivity is anecdotal, but real. Conventional scale farmers talk of instances (usually over the fence because this is the only perceived avenue they have) of pressure to cease aspects of, or, their total operation. Lifestyle dwellers will find some conventional farming practices unsavoury.

Agrichemical application, fertiliser spreading, livestock effluent disposal, machinery noise, burning agricultural refuse (e.g. crop stubble), and animal bellowing, smell and sexual behaviour all lead to tensions between lifestyle dwellers and more conventional farmers. Sometimes these confrontations become violent or legally costly. Some farming operations have had to cease, or move as the pressure of numbers of residents in a boundary zone outweigh any historic or 'grandfather rights' as to who was there first. The Trust produces all of its cereal grain for a multimillion dollar Wanganui intensive livestock business that has had to move a major part of its operation outside the Wanganui District as a result of reverse sensitivity pressures. The cost to both businesses has been substantial. The economic impact of this type of consequence is not something Wanganui can sustain.

Established farmers may be required to change their mode of production incurring unrecoverable costs. Neighbour behaviour can have unintended negative economic impacts. This might be as little as unwanted shading of ground or as large as significant bird and insect damage to crops facilitated by a neighbour's tree planting programme. It might also be as problematic and irreversible as to create undrainable flooding of adjacent farmland. This has happened in Westmere in both substantiated and unsubstantiated cases.

What is not apparent to many is that boundary sensitivities are such that their impact is felt rather more widely than a narrow buffer zone. Subdivision tends to occur along established roads or rights-of-way. How reverse sensitivities work is best envisaged by considering a hypothetical example of lots being spread along two or three roads which border a large block of conventionally farmed land. The sensitivities can effectively affect many times the area specifically given over to the smallholdings involved when an extensive amount of the adjacent area becomes the source of annoyance and is deemed unfit for its established purpose.

2) Service Costs

As subdivision continues, the density of housing obviously increases; and so does population density. While the response of a council might be to say "well they just won't get them" there will come a time when political and environmental pressures demand centralised water, wastewater, refuse collection, and streetlighting services.

Roading costs are currently huge for Wanganui and the cost of rural road maintenance will only increase further beyond our ability to afford it as greater numbers of rural residents, somewhat more spatially placed than urban or rural residentially located, demand a level of service that they expect. Council will find it increasingly hard to deny these residents their requests.

3) Impact on Wanganui District Council Finances

Quite apart from the serious loss of future income for the total Wanganui District, continued subdivision of our prime land will effectively erode Council's financial position. It has been argued that the creation of smaller titles supporting dwellings will add to the District's rate take and that PPC 36 will nullify that opportunity. In all probability the reverse is true.

Wanganui has not grown in population for some decades and any future growth will be slight. Housing supply and residential land availability is already shows well in excess of demand and prices are amongst the nation's lowest. This is a "poverty trap" and to worsen it by encouraging people to move to yet more sparsely housed subdivisions does nothing more than reduce the efficiencies of our current services while creating demand for more stretched ones. Fundamentally, it simply moves the rate take sideways.

Linked to the case put for continuing subdivision is the opportunity for Wanganui to capitalise on a desirable location for established families to set up home. The rural environment, especially the flat and fertile soils close to the city, is offered as an enticement. Little external income is earned by the current rural lifestyle real estate merry-go-round. New homes built will be just as fulfilling for the building industry irrespective of which zone they are constructed in. Wanganui has the choice of either retaining its better soil resources which should be there forever, or having them consumed by one permanent retirement village. The latter is a short-term, and probably fatal, vision.

Additional changes

- 1) The Trust argues that the 'one-off' provision for further subdivision on already approved lots (as of 1st May 2014) smaller than ten hectares be removed.

The rationale for this is that there is no logical reason to permit it. Additional dwellings may still be constructed (subject to approval) by family members on existing properties down to the established minimum and there is no need to further subdivide titles. If family members cannot agree and legally arrange to live together on one title in separate dwellings, it begs the question of why they would want to live next door to each other at all.

- 2) The Trust argues that the 10 metre minimum distance from boundaries for tree planting should apply to every category of tree, including *ornamental*. This provision should only apply over the Class 1 and Class 2 highly productive soils which the changes address. Notwithstanding caveat emptor, asking that neighbours agree to a different (i.e. 4 metre) minimum set-back for ornamentals is bound to create difficulties when properties are sold.

The rationale for this is twofold. Firstly, regardless of purpose, trees have the same root effects across boundaries and impose costs and inconvenience on neighbours and services. Secondly, removing the categorisation in PPC36 removes the ambiguity surrounding what purpose a tree is planted for. A loophole for argument is thereby removed. After all, this reasoning is applied to buildings.

Summary Comments

Wanganui District is endowed with some very special soil resources but these are notably limited.

Jarred Diamond, world-renowned geographer and anthropologist, has written extensively of societal collapse. He draws examples of similar resource management processes failing in Norse Greenland, among the American Indian of the South West United States, amongst the Maya in Mexico and Guatemala, and on Easter Island. Commonly, they failed to protect their resources and exploited them into run-away situations. These resources were physical and mostly agricultural. We should now do better. Apparently not, as he points to recent destruction in the American North Western states with the wanton degradation of soils and water resources attributable to the logging industry.

Trends in global demographics such as China's middle-class growing to a population greater than the United States total by 2022 suggest that we can, and must, take advantage of the demand for clean, safe food. Wanganui simply has too few long-term options to destroy our non-renewable resources. While it is evident that already the horse may have bolted to some extent, it is not too late to salvage what is left and realise our future potential.

All of this is about a 50 year and beyond strategy. Some will bemoan (perhaps many) a curtailing of their immediate business opportunities. They are short-term and individual. We have to plan for a more distant future and the greater good.

Some may argue that PPC36 removes a landowners (actually, titleholders) right to do with "their land as they wish" but in the process of further subdivision of the areas defined in PPC36, their wish would be the last time that right could be invoked. Further subdivision will not be feasible and the capital involved would prevent any return to productive land. Of course, in building, the soil is removed so the physical possibility of such a return is a nonsense anyway.

PPC 36 seeks to redress what is little short of economic vandalism.

What the Trust seeks

Ridgway Trust supports PPC36 in seeking to restrict subdivision of the defined Class 1 and Class 2 soils.

Ridgway Trust seeks the removal of the provision to allow one further subdivision on lots less than ten hectares that are subject to the 1st May 2014 exemption.

Ridgway Trust seeks an amendment to PPC 36 such that *all* tree plantings on boundaries are subject to the 10 metre set-back provision in the areas of Class 1 and Class 2 soils covered by PPC 36.

The Trust wishes to thank WDC for the opportunity to document its views and speak to them.

Yours sincerely

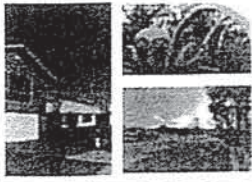
Alan Taylor
Trustee

SCANNED

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SIGS COUNCIL

- 4 JUN 2014



Resource Management Act 1991
Submission on a Publicly Notified Plan Change
To The Wanganui District Plan



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

TO: Wanganui District Council, PO Box 637, Wanganui

Name: (print in full) RICHARD OWEN

This is a submission on Plan Change No. 36 to the Wanganui District Plan. Closing Date: 5:00pm, 4 June 2014.

- 1. (a) I ~~could~~ could not* gain an advantage in trade competition through this submission. (*please delete one).
- (b) I am/am not* directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (*please delete one).

2. The specific provisions of the proposed plan change that my submission relates to:
Change 36: New Rural B Areas / Mosston Road Rezoning

Use additional pages if required

3. My submission is that (Please state in summary the nature of your submission. Clearly indicate whether you support or oppose the specific provisions or wish to have amendments made. Please give your reasons):

Mosston Road Rezoning to New Rural B Area should extend along Mosston Road towards Castlecliff. Change 36 currently has this area as Rural C Zone. Lifestyle developments are already in existence in this area, and Change 36 rezoning should reflect this.

Use additional pages if required

4. I seek the following decision from the Council (Give clear details stating what amendments you wish to see made to the Plan Change, and your reasons):

Change 36: Mosston Road Rezoning to New Rural B area to be extended along Mosston Road towards Castlecliff, so as to reflect the lifestyle developments already in place now, and for the future.

Use additional pages if required

5. I ~~do~~ do not* wish to be heard in support of this submission (*please delete one).

6. If others make a similar submission I ~~would~~ would not* be prepared to consider presenting a joint case with them at any hearing (*please delete one).

7. Address for service:

40 PARSONS Street
St Johns Hill
WANGANUI

Signature:

[Richard Owen]

(Person making submission or person authorised to sign on

Day time phone No: 027 247 7757

behalf of person making submission)

Email: rjc_owen@xtm.co.nz

Date: 4 June 2014

