



Private Plan Change Application IWIK Trust 21A Manuka Street, Whanganui

March 2026

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Appendix 6 – Iwi Consultation Documents and Reporting

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Appendix 8 – Geotechnical Report

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Appendix 11 – General Residential Zone

Appendix 12 – Site photos

Appendix 13 - Request for Further Information and Response






Appendix 14 - Draft Wastewater Network Assessment

Appendix 15 - Emails from Council on Wastewater Provision

2. Quality control

Document	Private Plan Change Request – 21A Manuka Street Whanganui
Ref	720246
Date	1 September 2025
Prepared by	Tatyana Kooznetzoff
Reviewed by	Matt Heale

Revision history

Rev	Revision date	Details	Authorised	
			Name/Position	Signature
1	17 July 2025	Drafted	Tatyana Kooznetzoff Property Consultant	
2	21 July 2025	Reviewed	Matt Heale Principal Planner	
3	1 September 2025	Finalised	Tatyana Kooznetzoff Property Consultant	
4	12 th December 2025	Updated to include section 32 RFI	Ryan O'Leary	
5	26 February 2026	Update to Include Wastewater Capacity Assessment	Ryan O'Leary	

3. The Applicant and Property Details

To:	Whanganui District Council
Site Address:	21A Manuka Street, Castlecliff, Whanganui
Applicant's Details:	IWIK Trust 173 Ness Valley Road, Ness Valley, Auckland kirsty@khp.nz 027 934 7382
Address for Service	Ryan O'Leary The Property Group Limited roleary@propertygroup.co.nz 027 469 8992
Legal Description:	Lot 1 Deposited Plan 73540, Lot 1-4 Deposited Plan 3943, Lot 3 Deposited Plan 22260 and Part Lot 2 Big Application Plan 166
Site Area:	4773m ² more or less
Whanganui District Plan Zoning:	Open Space
Brief Description of Proposal:	A Private Plan Change Request to rezone 21A Manuka Street, Whanganui from <i>Open Space Zone</i> to the <i>General Residential Zone</i> .

4. Introduction

IWIK Trust (“the Applicant”) applies to Whanganui District Council for a Private Plan Change Request to rezone the land at 21A Manuka Street, Whanganui from *Open Space Zone* to *General Residential Zone*.

IWIK Trust own the land at 21A Manuka Street, Castlecliff, Whanganui (“the site”) which no longer operates as the Castlecliff Bowling Club.

The Applicant intends to release land for residential development and is strategically important to the Whanganui District Council in meeting the future housing needs of the Whanganui District.

5. Executive Summary

IWIK Trust (the Applicant) are seeking a change to the Whanganui District Plan to rezone the 4773m² site at 21A Manuka Street, Castlecliff, Whanganui. The site is currently owned by Kirsty Dawn Healey and Peter John Clark. The site is currently zoned *open space* with the plan change request seeking the rezoning to *General Residential*. Following acceptance of the Private Plan Change the site will adopt the Operative District Plan provisions of the *General Residential Zone*.

The purpose of the plan change is to zone the site to make the most efficient use of the underutilised land resource in a way that mitigates adverse effects on the environment and helps increase housing supply in Whanganui.

The reasons for this plan change request are:

- the change will assist Council in meeting the future housing needs of the Whanganui District.
- the change will promote the most efficient and effective use of the land and is the most appropriate way to achieve the sustainable management purpose of the RMA
- the land is well located for commuting to and from the urban centre and has good access to recreation reserves

Ongoing communications have been had with Council staff prior to the lodgement of this Plan Change Request and have been attached as [Appendix 6](#). Consultation with iwi has commenced. There is an expectation from Ngā iwi o Taranaki to engage with Hapū. This is currently being sought. All iwi engagement details and records can be found in [Appendix 2](#).

This report details the comprehensive evaluation in accordance with section 32 of the Resource Management Act 1991 (RMA) that has been undertaken to confirm the appropriateness of the Plan Change. The proposed rezoning of the site meets the objectives of the Manawatū-Whanganui Regional Plan, the Whanganui District Plan, and the purpose of the Resource Management Act (1991) in an effective and efficient manner.

6. Site Location and Description

1.1 Site Description

The 4773m² site is made up of 7 parcels held in one Record of Title and is described as Lot 1 Deposited Plan 73540, Lot 1-4 Deposited Plan 3943, Lot 3 Deposited Plan 22260 and Part Lot 2 Big Application Plan 166 and is included as Appendix 1.

Currently the site contains the *Castlecliff Bowling Club* and former buildings. Being a former, privately owned bowling club, the site is not subject to the provisions or requirements of the Reserve Act 1977. The topography of the site is relatively flat and has depression areas of greater than 300mm, consistent with its former land use. The site's only road frontage is to Manuka Street where there is a supply 45° kerbside parking. There is an existing transformer near the south-western corner of the site.

The site has legal and physical access to Manuka Street, existing power and telecommunications connections, and is serviced for wastewater, stormwater and water supply via on-site means.

The adjoining properties contain existing residential buildings. St Lukes Anglican Church is located on the opposite side of Manuka Street.



FIGURE 1, AERIAL IMAGE OF THE SITE (SOURCE: GRIP)

6.1 Site Location

From Castlecliff, the Whanganui City Centre is located 8km from Queens Park in the Whanganui urban area. The wider site location is shown below in *Figure 2*.



FIGURE 2, LOCATION OF THE SITE IN WHANGANUI (SOURCE: GRIP)

Castlecliff is a western beachside suburb in the Whanganui District and the Manawatū-Whanganui Region. It consists of residential dwellings and supporting activities such as St Lukes Church across the road, the Citadel Café, and Castlecliff Beach and Reserve.

The 201-bus route stops immediately outside the site.

7. Background

7.1 History of the Castlecliff Bowling Club

The Castlecliff Bowling Club was first established in 1918 when 21A Manuka Street was purchased in May. By December the first green was open to play.

Due to dwindling club member numbers and high operational costs, the club closed its doors shortly after its centennial in November 2018. Peter Clark and Kirsty Healey purchased the site with the intention of pursuing a residential land use.

Currently, the applicant has the intention of pursuing a Private Plan Change Request with the intention of selling the site following rezoning.

7.2 Pre-Application Process

On the 5th of June 2025, Ms Kooznetzoff and Mr O’Leary meet with Mr Walters – Whanganui District Council Principal Policy Planner to discuss the potential for a Private Plan Change Request to rezone the site from *Open Space Zone* to *General Residential Zone*.

At this early meeting and summarised via email attached as Appendix 2, Mr Walters indicated that Council would be generally supportive of the merits of rezoning the land to residential, subject to technical evidence to support the plan change being as follows:

- A Detailed Site Investigation – attached as Appendix 5
- Flooding / Overland flow paths – attached as Appendix 7
- Geotechnical – attached as Appendix 8
- Servicing feasibility – attached as Appendix 7
- Site / Vehicle access – this can only be known upon future development.

The timing of the plan change closely aligns with Local Government Elections. The next available Council meeting to decide whether to accept the request is on the 18th of November 2025.

We note the comments provided by Damien Wood attached as Appendix 6. Particularly the following comment

“The Applicant must undertake an assessment of the effects that removing the depression area will have on the surrounding properties and roads.”

I firstly note the importance of ensuring stormwater effects are mitigated and believe that this can be reasonably dealt to at Resource Consent stage for the following reasons. No earthworks are proposed as a result of the re-zoning. A private plan change application does not assess the effects of development but rather the potential for development and whether avoidance, mitigation, or remediation is plausible. Alternatively, it assesses the effect of the difference between the open space zone and the general residential zone. We cannot offer an assessment of the effects that removing the depression area would have on the surrounding properties and road because this would need a detailed stormwater design for a specified proposal which we are not proposing. Rather what we have offered is a report that confirms this can be reasonably dealt with at resource consent stage.

We also note that any earthworks that alters an overland flow path would require resource consent under EW-S1.6 of the Operative Whanganui District Plan. Therefore, we are confident that any effect can be reasonably dealt with at Resource Consent stage.

Additional correspondence and meetings were undertaken with Council staff to clarify issues raised post lodgement of the *Draft* Private Plan Change request. This culminated in a *Draft* Further information request attached at Appendix 13. The draft response to this request is also attached at Appendix 13. In summary:

- The objective of the proposal was amended to “zone the site in a way that mitigates adverse effects on the environment and helps increase housing supply in Whanganui”
- The “Analysis of the Proposal Objective to achieve the Purpose of the RMA” has been updated
- Additional information was provided about how wastewater issues are managed within the Operative District Plan
- This application has been updated to show how Tupua te Kawa has been addressed.

The Council subsequently accepted this information but still raised concerns about wastewater management. The applicant agreed to commission a report regarding wastewater capacity. This matter is discussed in detail in the Wastewater Section of this report below.

8 Description of the plan change request

8.1 Description of the proposal

The Plan Change Request seeks to rezone 21A Manuka Street being 4773m² more or less, from *Open Space Zone* to *General Residential Zone*.

The Plan Change Request does not intend to alter any District Plan rules, policies or objectives. This request is to rezone and apply the Operative *General Residential Zone* objectives, policies and rules to the site.

The rezoning would allow for the natural extension of the surrounding *General Residential Zone* subject to the Operative District Plan criteria.

8.2 Purpose and reasons for the plan change

Clause 22(1) in Schedule 1 of the RMA requires that a Plan Change request explains the purpose of, and reasons for the proposed plan change.

Objective (here, “purpose of the proposal”): to zone the site to make the most efficient use of the underutilised land resource in a way that mitigates adverse effects on the environment and helps to increase housing supply in Whanganui.

Proposal means: To rezone 4,773m² of Open Space Zone to General Residential Zone.

Provisions means: Rezone existing Open Space Zone to General Residential Zone as outlined in the Operative District Plan

The reasons for this plan change request are:

- the change will assist Council in meeting the future housing needs of the Whanganui District.
- the change will promote the most efficient and effective use of the land and is the most appropriate way to achieve the sustainable management purpose of the RMA
- the land is well located for commuting to and from the urban centre and has good access to recreation reserves

This plan change request application provides an assessment of effects of the rezoning and an evaluation of the plan change in accordance with Section 32 of the RMA. Supporting expert assessment reports are located in the appendices being:

- Appendix 5 – Detailed Site Investigation
- Appendix 7 – Serviceability Report
- Appendix 8 – Geotechnical Report
- Appendix 14 – Draft Wastewater Network Assessment

Overall, the evaluation of the plan change concludes that the proposal is the most appropriate way to achieve the purpose of the RMA, as outlined in the Section 32 Report attached at Appendix 3.

9 Planning Context

9.1 Whanganui District Plan

The site is located within the *Open Space Zone* of the Whanganui District Plan.

Under the District Plan roading hierarchy Manuka Street is a Local Road and Cornfoot Street is a Collector Road. The site is not subject to any overlays.

The site is identified as being subject to the following notations in Council’s GIS Maps:

- Moderate Liquefaction Area
- 1Ha Overland Flow Paths
- Depressions greater than 300mm.
- Depression less than 300mm.



FIGURE 3, EXCERPT OF DISTRICT PLAN ZONING (WHANGANUI DISTRICT PLAN)

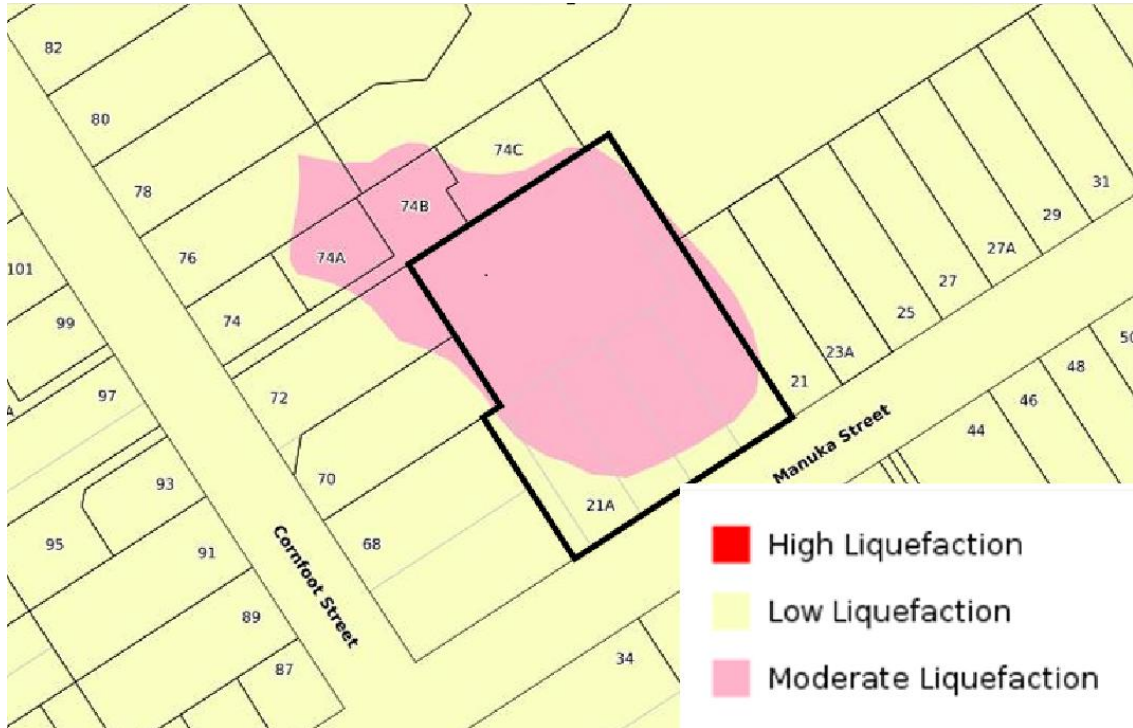


FIGURE 4: LIQUEFACTION (WHANGANUI DISTRICT PLAN)



FIGURE 5: OVERLAND FLOW PATHS (WHANGANUI DISTRICT PLAN)

The wider environment is zoned *General Residential*. The Castlecliff domain and reserve, which is also zoned *Open Space*, is 450m west of the site.

9.1.1 Current Consenting Framework

Residential activities are not specifically provided for under the *Open Space Zone* rules of the Operative Whanganui District Plan. However, resource consent would be required for any residential building(s) or activities under Rule OSZ-R3 2. This is a 'catch-all' rule which states that any activity not listed as a Permitted or Restricted Discretionary Activity will be assessed as a Discretionary Activity.

Under the Operative Whanganui District Plan residential development would be classified as a Discretionary Activity

9.1.2 Plan Change 63 – Heritage

Plan Change 63 – Heritage is not relevant to this private plan change request or the site. In February 2024 the WDC publicly notified Plan Change 63 – Heritage.

Plan Change 63 seeks to:

- simplify the heritage classes in Appendix A of the DP;
- reclassify the heritage classes classified as C, BR, SCA or contributory in Appendix A;
- update Appendix A to include sites no otherwise listed in Appendix A.
- introduce rules for archaeological sites listed in Appendix K;
- remove sites from Appendix K with low levels of evidence; and
- creating a new Appendix – Appendix B, for scheduled Wāhi Tūpuna sites.

At this stage the plan change was notified in February 2025 and heard in June 2025. Council is yet to make their decision.

After assessing the scope and content of the plan change, 21A Manuka Street is not a relevant site. The provisions of Plan Change 63 will not affect this plan change request.

10 Statutory Planning Framework

10.1 Statutory Context

Schedule 1 of the Resource Management Act (RMA) sets out the process for changes to District and Regional Plans. Clause 21 of that schedule states that any person may request a change to a District or Regional Plan and Clause 22 requires that the request to change a plan must be made to the appropriate Local Authority in writing. A request for a plan change shall:

- Explain the purpose and reason for the plan change (see Section 8).
- Contain an evaluation report prepared in accordance with Section 32 (see Appendix 3).
- Where environmental effects are anticipated, the request shall describe those effects, taking into account clause 6 and 7 of Schedule 4, in such detail that corresponds with the scale and significance of the actual or potential environmental effects associated with the implementation of the plan change (see Section 13).

10.2 Section 32 Analysis

Section 32 of the Act requires any proposed plan change to provide an assessment of the effectiveness, efficiency, costs, benefits and risks of the requested plan change including alternative options. A full Section 32 analysis is provided in [Appendix 3](#) to this report.

10.3 Accepting the Plan Change Request (Clause 25 Evaluation)

The Council has discretion to adopt, accept or reject a Plan Change request in accordance with Clause 25 of Schedule 1 of the Resource Management Act 1991 (RMA), subject to the matters set out in Clause 25(4)(a)-(e). The Council is able to reject the Plan Change request only on the following grounds:

- a) The Plan Change Request is frivolous or vexatious (clause 25(4)(a));
- b) within the last 2 years, the substance of the request or part of the request—
 - i. has been considered and given effect to, or rejected by, the local authority or the Environment Court; or
 - ii. has been given effect to by regulations made under section 360A; or
- c) The Plan Change Request is not in accordance with sound resource management practice (clause 25(4)(c));
- d) The Plan Change Request would make the plan inconsistent with Part 5 –Standards, Policy Statements and Plans (clause 25(4)(d).

10.3.1 Clause 25(4)(a)

In relation to (a), considerable technical analysis has been undertaken to inform the Private Plan Change Request, which is detailed throughout this report. The Private Plan Change Request has been prepared in accordance with best practice and is consistent with RMA Part 5. For these reasons, the proposal is not frivolous or vexatious.

10.3.2 Clause 25(4)(b)

In relation to (b), the substance of this request has not been considered in the past 2 years by the local authority – see list below.

- Potential Plan Change 58 – Outer Castlecliff. In 2019 Council investigated the rezoning of additional land in Castlecliff for residential development. The land considered for rezoning was zoned *Reserves and Open Space* and *Rural Lifestyle* (Figure 6). 21A Manuka Street was not within scope of this investigation. In 2022 Council ceased progressing Plan Change 58 as a council-initiated plan change.

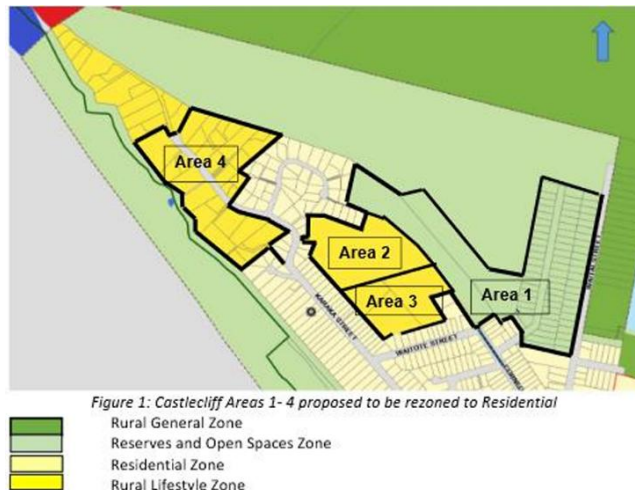


FIGURE 6, PLAN CHANGE 58 MAP

- Plan Change 26 *Residential Zone*. The scope of this plan was to amend the existing District Plan *Residential Zone* to reflect the changes that have occurred since the Operative Plan was implemented. It introduced minimum lot sizes (400m²) and recognised the importance of amenity and urban character. PC26 was made operative on the 7th of August 2014.
- Plan Change 28 – *Reserves and Open Space Zone*. The scope of this plan change was to enable commercial activities within the *Reserves and Open Space Zone* and create more certainty around what activities could be undertaken in which parts of this Zone. PC28 was made operative on the 19th of December 2013 (except Rule 7.5.5(f)). Rule 7.5.5(f) was made operative on the 7 August 2014.

10.3.3 Clause 25(4)(c)

With regards to (c), the RMA does not define ‘sound resource management practice’ however case law suggests that the timing and substance of the Plan Change are relevant considerations. This requires detailed and nuanced analysis of the proposal that recognises the context of 21A Manuka Street and its specific planning issues.

In this context, the Plan Change is considered to be in accordance with sound resource management practice for the following reasons:

- a) The detailed technical analysis undertaken as part of this proposal demonstrates that there is no planning reason that would prevent the development occurring once the land is rezoned.
- b) All necessary statutory requirements have been met, including an evaluation in accordance with s32a with supporting evidence.

- c) The Plan Change is consistent with the sustainable management purpose of the RMA as discussed in the report below.

On this basis, the merits of the Plan Change should be allowed to be considered through the standard Schedule 1 process.

10.3.4 Clause 25(4)(d)

No part of this plan change would make the Whanganui District Plan inconsistent with Part 5 Standards, Policy Statements and Plans of the RMA (1991).

11 Policy Framework

11.1 National Policy Documents

Section 74(1)(ea) and (f) of the RMA states that a Territorial Authority must prepare and change its District Plan in accordance with a National Policy Statement, a National Planning Standard and any regulations. The following national direction documents are considered relevant.

11.1.1 National Policy Statement on Urban Development (2020)

The National Policy Statement on Urban Development (NPS-UD) recognises the national significance of having well-functioning urban environments that enables people and communities to provide for their social, economic and cultural well-being, and for their health and safety, now and into the future; and providing sufficient development capacity to meet the different needs of people and communities. Under the NPS-UD Whanganui District Council are identified as a Tier 3 territorial authority. The objectives and policies most relevant to the application have been identified and are addressed below. The NPS-UD directs decision making under the Act.

- Objective 1:** New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.
- Objective 2:** Planning decisions improve housing affordability by supporting competitive land and development markets.
- Objective 3:** Regional policy statements and district plans enable more people to live in, and more businesses and community services to be located in, areas of an urban environment in which one or more of the following apply:
 - (a) the area is in or near a centre zone or other area with many employment opportunities
 - (b) the area is well-serviced by existing or planned public transport
 - (c) there is high demand for housing or for business land in the area, relative to other areas within the urban environment.

Objective 4: New Zealand’s urban environments, including their amenity values, develop and change over time in response to the diverse and changing needs of people, communities, and future generations.

Objective 5: Planning decisions relating to urban environments, and FDSs, take into account the principles of the Treaty of Waitangi (Te Tiriti o Waitangi).

Policy 1 Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:

(a) have or enable a variety of homes that:

- i. meet the needs, in terms of type, price, and location, of different households; and
- ii. enable Māori to express their cultural traditions and norms; and 10 National Policy Statement on Urban Development 2020

(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and

(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and

(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and

(e) support reductions in greenhouse gas emissions; and are resilient to the likely current and future effects of climate change

Policy 2 Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.

Policy 6: When making planning decisions that affect urban environments, decision-makers have particular regard to the following matters:

(a) the planned urban built form anticipated by those RMA planning documents that have given effect to this National Policy Statement

(b) that the planned urban built form in those RMA planning documents may involve significant changes to an area, and those changes:

- i. may detract from amenity values appreciated by some people but improve amenity values appreciated by other people, communities, and future generations, including by providing increased and varied housing densities and types; and
- ii. are not, of themselves, an adverse effect

- (c) the benefits of urban development that are consistent with well-functioning urban environments (as described in Policy 1)
- (d) any relevant contribution that will be made to meeting the requirements of this National Policy Statement to provide or realise development capacity
- (e) the likely current and future effects of climate change.

Policy 8: Local authority decisions affecting urban environments are responsive to plan changes that would add significantly to development capacity and contribute to well-functioning urban environments, even if the development capacity is:

- (a) unanticipated by RMA planning documents; or
- (b) out-of-sequence with planned land release.

Policy 9: Local authorities, in taking account of the principles of the Treaty of Waitangi (Te Tiriti o Waitangi) in relation to urban environments, must:

- (a) involve hapū and iwi in the preparation of RMA planning documents and any FDSs by undertaking effective consultation that is early, meaningful and, as far as practicable, in accordance with tikanga Māori; and
- (b) when preparing RMA planning documents and FDSs, take into account the values and aspirations of hapū and iwi for urban development; and provide opportunities in appropriate circumstances for Māori involvement in decision-making on resource consents, designations, heritage orders, and water conservation orders, including in relation to sites of significance to Māori and issues of cultural significance; and
- (c) operate in a way that is consistent with iwi participation legislation.

21A Manuka Street has access to a well-functioning urban environment. Active and public transport options are supported, and open space and reserve areas are in close proximity to the site (Objective1).

The decision to accept this Private Plan Change Request could, in accordance with the District Plans performance standards provide, 10 new lots/dwellings to the Castlecliff area. This will support “greater demand for housing than predicted in the 2015 Council study.”¹ The Castlecliff area is nearing its infill capacity, and no additional land has been identified despite a high performing development market. If accepted, this plan change request will improve housing affordability by boosting competitive land and development markets (Objective 2). It would also provide sufficient development capacity for Council to meet their short-, medium-, and long-term housing demand expectations (Policy 2).

¹ [Plan Change 58 - Outer Castlecliff Scoping Report 2019](#)

In accordance with Objective 3 and Policy 1:

- (a) Castlecliff is near the Whanganui Urban Centre
- (b) A bus stop is located directly outside the site and is a 24-minute bus ride from the Whanganui District Council.
- (c) There are signals of market demand for residential development at Castlecliff evidenced by successful developments and an increase in demand for three waters connections.²

The Castlecliff Bowling Club was closed due to dwindling member numbers and increasing expenditure. This comes as bowls clubs across New Zealand face the same challenges. This Private Plan Change Request, following the sale of the site, comes as the needs and values of communities have changed. This private plan change proposal responds to these changing needs (Objective 4).

This plan change request proposal has considered all principles of the Te Tiriti o Waitangi. The principle of partnership is of particular relevance. Iwi have been involved from the start of this process. In relation to Te Awa Tupua and Tupua te Kawa, we have sought to ensure the intrinsic values of Tupua te Kawa are protected and upheld (Objective 5 and Policy 9).

The PCC request has been assessed as to whether it will add ‘significantly’ to development capacity under the Manawatū Whanganui Regional Policy Statement UFD-P6. It has been assessed in *Appendix 4* that the private plan change request is significant. I have provided an excerpt of this assessment below.

UFD-O3: Urban form and function:	Comment
<p>The intensification and expansion of urban environments*:</p> <ol style="list-style-type: none"> 1. contributes to well-functioning urban environments* that: <ol style="list-style-type: none"> a. enable all people, communities and future generations to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future, b. increase the capacity and choice available within housing and business land*, c. achieve a quality, sustainable and compact urban form, d. are, or planned to be, well connected by a choice of transport modes including public transport*, 	<p>The plan change request site is one that has access to a well-functioning urban environment. Active and public transport options are supported, and open space and reserve areas are in close proximity to the site.</p> <p>The decision to accept this plan change request could, in accordance with the District Plans performance standards provide, 10 new lots/dwellings to the Castlecliff area. This will support “greater demand for housing than predicted in the 2015 Council study.”³ The Castlecliff area is nearing its infill capacity, and no additional land has been identified despite a high performing development market. If accepted, this plan change request will improve housing affordability by boosting competitive land and</p>

² [Plan Change 58 - Outer Castlecliff Scoping Report 2019](#)

³ [Plan Change 58 - Outer Castlecliff Scoping Report 2019](#)

<p>e. manage adverse effects* on the environment, and</p>	<p>development markets (Objective 2). It would also help provide sufficient development capacity for Council to meet their short, medium, and long term housing demand expectations.</p>
<p>f. manage adverse effects* (including reverse sensitivity effects*) to ensure that the operation, maintenance and upgrade of nationally significant infrastructure*, and physical resources of regional or national importance are not compromised.</p>	<p>Any effects of residential development will be addressed at resource consent stage.</p>
<p>2. enable more people to live in, and more businesses and community services* to be located in, areas of an urban environment* where:</p>	<p>In accordance with 2</p>
<p>a. it is in or near a centre zone* or other area with many employment opportunities,</p>	<p>(a) Castlecliff is near the Whanganui Urban Centre</p>
<p>b. it is able to be, or is, well-serviced by existing or planned public transport* and active transport*,</p>	<p>(b) A bus stop is located directly outside the site and is a 24-minute bus ride from the Whanganui District Council.</p>
<p>there is a high demand for housing or business land*, relative to other areas within that urban environment*.</p>	<p>(c) There are signals of market demand for residential development at Castlecliff evidenced by successful developments and an increase in demand for three waters connections. ⁴</p>

In accordance with NPS-UD Policy 8, Council should be responsive to this plan change request even if it considers it to be

- Unanticipated by RMA planning documents; or
- Out-of-sequence with planned land release.

The proposal has been assessed against these and any other relevant objectives and policies and is considered to achieve the outcomes sought by the NPS-UD, albeit noting that these are broadly cast. Thus, it is considered that the Private Plan Change Request will contribute to providing a well-functioning urban environment and this plan change request is in support of the key outcomes sought by the NPS-UD

11.1.2 National Policy Statement for Natural Hazards (2025)

The National Policy Statement for Natural Hazards (NPSNH) came into force on 15 January 2026. The NPSNH covers a range of natural hazards including flooding. The objective is to manage natural hazard risk to people and property associated with subdivision use and development using a risk based proportionate approach.

⁴ [Plan Change 58 - Outer Castlecliff Scoping Report 2019](#)

NPSNH policies require natural hazard risk to be assessed using the risk matrix noting that natural hazards must be managed using a proportionate approach where very high natural hazard risk must be avoided.

The applicant has engaged Ms Beamsley from Orogen to confirm that the site is appropriate for future residential development. Ms Beamsley's assessment is contained in Appendix 7. Based on this assessment it is considered that natural hazard risk is considered low as the site does not have a flood hazard but rather an overland flow path - see Figure 7 below. Ms Beamsley also states that:

“Any development will need to integrate into the surrounding landform and manage the flows arriving from the upstream catchment. This can be achieved through earthworks to raise site levels, remove the depression area, provide access to new lots, establish flood free building platforms and establish flow paths through or around the site. These are standard activities for a residential development and can be supported by designs completed for resource consent.”

It is therefore considered that the Private Plan Change will achieve the objectives and policies of the NPSNH.

11.2 National Environmental Standards

The National Environmental Standard (NES) of relevance to this Plan Change is the NES for Assessing and Managing Contaminants in Soil to Protect Human Health (2011).

11.2.1 National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health 2011

The NES-CS provides standards for activities on land whose soil may be contaminated in such a way that it may be a risk to human health. The site is classified as being managed, with the identified HAIL category being A10 - Persistent Pesticide Bulk Storage or use including Sport Turfs, Market Gardens, Orchards, Glass Houses or Spray Sheds.

A Detailed Site Investigation was completed by Land Development and Exploration Limited (LDE) and is attached as [Appendix 5](#). LDE consider a residential development to be suitable at 21A Manuka Street. On page 17 the report it states

“Based on the findings of the preliminary and detailed site investigations we consider that the proposed development on the piece of land is suitable.

The test results show that no soil is present at the site that exceeds soil contaminant standards applicable to residential (10% produce) land use. This indicates that the use of persistent pesticides on the greens has had limited impact on the site. The soil contaminant concentration of soil sample S5 (being slightly above typical background concentrations for arsenic, as well as slightly elevated levels of lead and trace level detections of OCPs), signifies possible impacts (albeit minor) resulting from applications of horticultural chemicals containing lead, arsenic and OCPs.

Because a change of land use will occur at the site from recreational (bowling green) to residential (lifestyle village) Regulation 5(6) of the NES (2011) applies to the site. Due to the presence of arsenic above typical background concentrations as well as

detections of OCPs (albeit below concentrations applicable to ‘residential 10% produce’ land use), the proposed activity would therefore be considered a “Controlled activity” under Regulation 9 of the NES.

The NES-CS is completely independent of the Whanganui District Plan. Irrespective of the zone of this site, future redevelopment or development of the site will always require consideration against the NES-CS to manage and mitigate risk to human health. Any works undertaken on site that are unable to comply with the permitted activity regulations set out under Regulation 8 of the NES-CS will need to seek the appropriate resource consent(s) from Whanganui District Council.

LDE have confirmed that a residential use is suitable. Any future use of the site will be controlled by the NES-CS.

11.3 Regional Policy Statements and Plans

The RMA at section 75(3)(c) states that a District Plan must give effect to any Regional Policy Statement and Section 75(4)(b) states that a District Plan must not be inconsistent with a Regional Plan for any matter specified in Section 30(1).

11.3.1 Manawatū-Whanganui Regional Policy Statement

An assessment of whether the plan change gives effect to the relevant objectives and policies of the Horizon’s One Plan is included as Appendix 4. The Regional Policy Statement requires consideration of the effects of land disturbance, erosion, hazardous substances and contaminated land, natural hazards, urban development, and te Tiriti o Waitangi and iwi / hapū engagement. This assessment has confirmed that the proposed rezoning will give effect to the policy direction in the Regional Policy Statement. Below is a summary of how the Plan Change Request gives effect to the Regional Policy Statement.

The PPC site is located within a moderate liquefaction area and is subject to surface ponding. Appendix 7 contains Orogens serviceability report and has confirmed that a residential use of the site is appropriate. An excerpt from the report outlining this finding is provided below.

“adverse effects from any proposed residential development on the public stormwater network would be avoided. Further detail of site suitable solutions can be developed for future Resource Consent applications.”

LDE’s Geotechnical report attached as Appendix 8 has confirmed that a residential use of the site would be appropriate. An excerpt from the report outlining this finding is provided below.

“From our assessment of the natural hazard and ground deformation risks presented to the residential rezoning, and development that may subsequently follow, we consider that buildings can be safely located within site, provided that appropriate designs / site management are undertaken in accordance with the appropriate codes and regulations, and council requirements.”

The effects of future subdivision or development in regard to natural hazards can be adequately mitigated at the time of future development.

The site is not located on versatile soils and infrastructure is available to provide for the integrated provision of infrastructure and urban development.

Research has revealed that Castlecliff is experiencing a resurgence and Whanganui is experiencing population increases that exceed what was anticipated in 2015. The site is supported by active and public transport options and open space and reserve areas in close proximity. Presently, Castlecliff is nearing its infill capacity, if accepted this plan change will boost housing affordability through improvements to a competitive land and development market.

The summary above and the detailed assessment in [Appendix 4](#) confirms that the proposed rezoning will give effect to the policy direction in the Manawatū-Whanganui Regional Policy Statement.

11.4 Management Plans and Strategies

Section 74(2)(b)(i) of the Act states that a Territorial Authority must have regard to any management plans and strategies prepared under other Acts.

11.4.1 Housing Strategy 2019

The preparation of this plan change has had regard to the Whanganui Housing Strategy 2019. The Plan Change Request is considered to give effect to the outcomes and actions of the Manawatū District Housing Strategic Action Plan, by:

- Increasing land supply, specifically in the Castlecliff area.
- Promoting infill development and urban consolidation. The infill capacity of Castlecliff is met and the site will add to land supply within an existing urban environment.
- Identifying an underutilised piece of land for future urban development
- Responding appropriately to landform and natural hazards with technical input to ensure potential impacts of climate change and natural hazards are able to be mitigated.
- Partnering with Council and Iwi to add to housing opportunities.

The Plan Change Request aligns with the intention, goals, and actions of the Housing Strategy 2019.

11.4.2 Whanganui Strategic Housing Investment Plan 2021-2031 (SHIP)

The purpose of the SHIP is to deliver on the Council's Housing Strategy 2019 assessed above. The preparation of this plan change has had regard to the priorities of the SHIP by:

- Actively seeking to regenerate underutilised land in the Castlecliff area.
- Identifying land within an existing urban environment for future development.
- Repurposing land for alternate housing uses.

11.5 Whanganui District Plan

As this is a request to change the District Plan, it needs to have regard to the broader strategic direction and outcomes that the District Plan seeks to achieve. An assessment against the relevant objectives and policies of the Whanganui District Plan is included as [Appendix 4](#). This

assessment concludes that the proposal will be consistent with and achieve the objectives and policies of the Whangarei District Plan.

11.6 Iwi and Hapu Planning Documents

The applicant has used Te Awa Tupua to guide engagement with Iwi and Hapū groups. Horizons Regional Council iwi contacts list and Te Puni Koriri iwi map has been used to identify and contact each Iwi and Hapū group who may have an interest in the Plan Change Request. The following Iwi and Hapū have been contacted:

- Ngā Rauru Kītahi; and
- Ngāti Apa; and
- Ngāti Maniapoto; and
- Ngāti Maru; and
- Ngāti Rereahu; and
- Ngāti Ruanui; and
- Ngāti Tuwharetoa; and
- Whanganui Iwi
- Te Puni Kōkiri
- Ngāti Hāua (Upper Whanganui)
- Ngāti Rangī
- Whanganui Land Settlement (Lower Whanganui)

From the communications to date, no initial objections to the proposed plan change have been raised. [Appendix 6](#) includes detailed reporting of all engagement and responses received to date.

On the 14th of August 2025 Ms Kooznetzoff met with Ms Williams from Ngā iwi o Taranaki to inform her of the proposal. She commented that consultation with hapu would be required and has endeavoured to obtain the contacts for us. We have requested these contacts to engage with hapū directly.

Council has noted that *Tupua Te Kawa* is the relevant iwi planning document to the proposal. This is assessed as follows:

Tupua Te Kawa

Ko Te Kawa Tuatahi

Ko te Awa te mātāpuna o te ora: the River is the source of spiritual and physical sustenance:

Te Awa Tupua is a spiritual and physical entity that supports and sustains both the life and natural resources within the Whanganui River and the health and well-being of the iwi, hapū, and other communities of the river.

Ko Te Kawa Tuarua

E rere kau mai i te Awa nui mai i te Kahui Maunga ki Tangaroa: the great River flows from the

mountains to the sea:

Te Awa Tupua is an indivisible and living whole from the mountains to the sea, incorporating the Whanganui River and all of its physical and metaphysical elements.

Ko Te Kawa Tuatoru

Ko au te Awa, ko te Awa ko au: I am the River and the River is me:

The iwi and hapū of the Whanganui River have an inalienable connection with, and responsibility to, Te Awa Tupua and its health and well-being.

Ko Te Kawa Tuawhā

Ngā manga iti, ngā manga nui e honohono kau ana, ka tupu hei Awa Tupua: the small and large streams that flow into one another form one River:

Te Awa Tupua is a singular entity comprised of many elements and communities, working collaboratively for the common purpose of the health and well-being of Te Awa Tupua.

The plan change request has actively considered tupua te kawa throughout the entire process. The primary approach was to engage with the iwi and hapū groups who connect with and to the river as they have a connection with and responsibility to Te Awa Tupua. We have tried to contact and engage with the relevant iwi groups as attached to this RFI response. Those who have responded have identified that the site is not within their jurisdiction or that they believe the proposal is fine if it would be subject to future resource / building consent requirements. Nevertheless, the request upholds and protects the values outlined in tupua te kawa as follows.

- The spiritual and cultural significance of te awa tupua is acknowledged and upheld.
- We have requested feedback and engaged with hapū and iwi early in the process to ensure we had not missed anything sensitive and to ensure physical and spiritual health and connection is recognised and respected in this process.
- No waterbody or significant planting is located in and around the site which could be of cultural significance or connect to te awa tupua and the site would be hydraulically neutral following future development (which is out of the scope of this private plan change)
- The site contains overland flow paths which connects with the surrounding catchment and te awa tupua. The proposed plan change has considered the effects associated with these paths and identified that any future development would be controlled by the Operative District Plan which requires overland flow paths to be integrated into the design of any future development. Council would have the discretion to require planting along the riparian strips.
- The rezoning would enable more land to be residentially developed to provide for those community members to live closer to the Whanganui River Estuary area and the Castlecliff beach.

12 Consultation and Engagement

Consultation is taking an informative approach with the objective of providing information on the proposal; the reason for the PPC application; and providing space to receive questions and feedback.

13 Assessment of Effects on the Environment

Clause 22(2) Schedule 1 of the Act requires an assessment of the anticipated environmental effects of any private plan change in accordance with Schedule 4 of the Act.

The following assessment has been informed by the technical analysis undertaken to determine the suitability of the site for residential development. It summarises the sites constraints and opportunities, how any development issues may be addressed via the proposed plan change and the positive and adverse effects arising from the proposal.

13.1 Residential Amenity Effects

21A Manuka Street is located within a residential environment. The Proposed Plan Change Request to rezone the site from *Open Space* to *General Residential* will integrate well into the existing environment. Any future development will be appropriately controlled by the Operative District Plan. The controls placed on the site by the Operative District Plan will maintain the existing residential character. The rezoning will permit a residential land use that aligns with the surrounding character on a site that has been underutilised due to its current operation as a bowling club. The rezoning will result in improved residential amenity effects.

13.1.1 Bulk and Density

Rezoning the site to *General Residential* will restrict the bulk and density of buildings more than the *Open Space Zone* standards. Currently, the site contains a single storey bowls club that extends along the western boundary, an irrigation pump station in the middle of eastern boundary, and two sheds to the north of the primary building. The bulk of the site is bowling green.

The predominant site area of surrounding lots is 700-1200m². This lower density land use acts as a buffer between the Rural Zone to the north. 74 – 74C Cornfoot Street has a density correlated with the Whanganui District Plan performance standards which indicates the pattern of higher density land use that could be anticipated by the proposed plan change.

By rezoning the site, there will be an increase in the density and usage. Under the Whanganui District Council planning provisions, a development with the following characteristics is permitted by the plan.

- SUB-S4 Lot Size. 400m².
- GRZ-S4 Max height 10m, height in relation to boundary 2m height and 45-degree angle, 40% building coverage,
- GRZ-S5 Site Area. Minimum net size area of 400m² per res unit.

The only control on buildings in the *Open Space Zone* is OSZ-S3 height in relation to boundary. The General Residential Zone would place more conservative controls on the development. However, we recognise that rezoning the site would permit up to 11 400m² Lots with dwellings controlled by GRZ-S4-S5. This would result in the borrowed amenity of surrounding sites to change; however, it would change to an activity appropriate in this context. Residential amenity will be enhanced by repurposing the site as it's currently unused. The *General Residential Zone* rules would ensure the adverse effects of bulk and form to be appropriately controlled and mitigated at resource consent stage.

13.1.2 Change in site usage

The proposed rezoning will change how the site is used. Generally, a bowls club is used for Bowls, venue hire, social events, and community engagement. This sort of activity results in an infrequent and variable use of the site. The proposed rezoning would result in a 24-hour residential use. This aligns better with the surrounding urban area. Adopting the Residential Zone controls is considered to uphold and improve the residential character of the area.

13.1.3 Noise

The proposed residential rezoning will fit appropriately into the existing residential noise environment. The noise effects on surrounding neighbours will improve as a result.

The maximum noise levels, measured at boundary of the surrounding *Residential Zone* for *Open Space* is slightly higher than what is required in the *Residential Zone* from 7pm – 10pm – see table below. The rezoning from *Open Space* to *Residential* will require more stringent noise requirements.

Time	Existing – Open Space. *Maximum noise level in the receiving residential zone	Residential
6am – 7pm	50	50
7pm – 10pm	50	45
10pm – 6am	40	40

Consequently, the effects from noise will be improved. Any future development will be appropriately controlled by the District Plan noise standards.

13.1.4 Residential Amenity Effects Conclusion

Based on the residential character of this environment, adopting the *Residential Zone* controls is considered to uphold and improve the residential character of the area. It is not expected that adverse amenity effects will result from this Private Plan Change and there may be benefits given the change to a more compatible residential land use with neighbouring properties.

13.2 Streetscape and Residential Character Effects – perception from the street

Streetscape and residential character effects relate to effects felt from the street and how the street and site interact with each other. This Plan Change Request will not have adverse effects on the streetscape and residential character because:

- The surrounding area is characterised by a residential streetscape. The proposed rezoning will fit into the existing landscape.
- The *Open Space Zone* permits structures so long as they fit within a height to boundary plane that commences at 2 metres above ground level and projects from this line inwards at a 45-degree angle.
- The residential rezoning of the site has the same height to boundary plane requirement as the *Open Space Zone* as well as additional provisions to control streetscape effects. The *Open Space Zone* permits greater building density than the *General Residential Zone*. Future development will be controlled appropriately by the *General Residential Zone Rules* of the District Plan and will more closely align with the existing environment.

Manuka Street has an undulating landform. On the flatter portions of Manuka Street, the streetscape is characterised by open front yards, low fencing, and varied setbacks. The northern side of Manuka Street has dwellings elevated above the road level.

A thin grass berm separates the single lane footpath from the road and a larger berm connects with the surrounding sites grassed front yards. Street trees line the southern footpath within this larger grass berm. There is a large section of kerbside parking to service the bowls club and adjacent Anglican Church.

This Plan Change Request will allow 21A Manuka Street to fit neatly within this exiting residential streetscape environment. The *Open Space Zone* only controls the construction of buildings with a height recession plane. The proposed rezoning will require compliance with the following standards:

GRZ-S4: Structures.

- Building height shall not exceed 10m.
- Height in relation to boundary plane (same as above). For multi-unit developments or care-facilities the boundary setback requirements will be based on the length and height of the façade adjacent to the boundary.
- Fencing. Front boundary 1.6m. All other boundaries 1.8m.
- Building coverage shall not be more than 40%.

GRZ -S5: Amenity

- Minimum net site area 400m²
- 30m² north to northwest facing outdoor living space.

These controls will allow for greater integration of the site, with the surrounding streetscape environment as opposed to the more permissive *Open Space Zone* controls. For this reason, the Proposed Plan Change will result in positive effects on the Manuka Street Streetscape.

13.3 Transport Effects

This plan change request to rezone the site from *Open Space Zone* to *General Residential Zone* will remain controlled by Transport Chapter of the District Plan. The potential effects of the rezoning while different, will allow for the adequate and enhanced control of the land transport network. Overall, the effects of the Private Plan Change Request is positive.

Under the existing zoning, parking including disability parks, the landscaping of car parking areas, loading, separation distances, and sightlines are all controlled. The proposed residential rezoning will apply the same controls plus vehicle crossing standards, which restrict the minimum widths of vehicle crossing based on the number of units being serviced by the site. This is an appropriate control for the safe access and egress from the site at the time of future development.

Potential effects of the proposal may result in changes to kerbside parking along Manuka Street however, there is no way of knowing if or how changes will be made. This will be dealt with at resource consent stage as there are many options available to develop the site. The vehicle crossing controls of the Operative District Plan will control how the site will be developed.

The site is located adjacent to a bus stop and active transport routes that connect to the urban centre and *Open Space Zones* – Castlecliff beach and reserve.

There will be a minor change to the rules that restrict the site (the inclusion of vehicle crossing requirements) this is appropriate for the change in land use from *Open Space* to *Residential*. Consequently, the effects of this change will be positive on the land transport network.

13.4 Infrastructure Effects

Infrastructure effects are the effects of the proposed plan change on Councils Reticulated Network due to additional connections to wastewater, stormwater, and water. The applicant has engaged Ms Beamsley from Orogen to confirm that the site is appropriate for future residential development. We have also confirmed that the rezoning would allow for these effects to be managed at resource consent stage, when development is known.

On the 5th of June 2025 Mr O’Leary and Ms Kooznetzoff (TPG Planning Consultants) met with Mr Walters (Council’s Planning Officer) to discuss the potential rezoning of the site. Following this meeting and attached as [Appendix 2](#) is a request from Mr Walters that

“The applicant demonstrate the that the site is suitable for residential development including [...]

- Flooding / Overland flow paths – Including and changes to the site as a result of fill to enable residential development noting that the existing greens currently shown as ponding areas.
- Servicing feasibility”

Firstly, it should be noted that the following subdivision standards of the Operative District Plan and S106 of the RMA (1991) will appropriately control any future development.

- SUB-S1 Subdivision and Engineering Basis

Subdivision and infrastructure design and construction shall be in accordance with NZS: 4404 2010 and the Engineering Document 2016. Where there is conflict between NZS

4404 2010, the Engineering Document 2016 prevails. The provisions in [the Plan](#) shall prevail over both NZS 4404:2010 and the Engineering Document 2016.

- SUB-S7 Site Serviceability
 1. *Each new allotment shall connect to reticulated water services (sewer, stormwater and water supply) excluding the Rural Lifestyle Zone which shall be required to demonstrate it can provide those services in the proposed allotment.*
- SUB-S8 Network Utilities
- SUB-S12 Servicing Capacity

Where subdivision occurs in any reticulated servicing catchment for water, wastewater, or stormwater and there is not sufficient capacity to meet the specified level of service, or the ability of that infrastructure catchment to provide that level of service to the remaining area of developable land in that catchment is reduced

The subdivider shall:

1. *be required to provide that level of service for their development at their own cost;*
2. *only be allocated an equitable proportion of existing servicing capacity based on land area, unless.*

Where additional capacity is available in an infrastructure catchment in excess of what is required to provide the specified level of service for the remaining areas of developable land, this may be allocated subject to approval of Council

- SUB-S14 Catchment Management Basis

The design, construction and operation of stormwater, water, and wastewater infrastructure to be vested in council or where it will connect to Council owned infrastructure shall take a whole of catchment based approach and shall meet the following requirements:

 1. *New infrastructure shall be adequate to meet the maximum potential demand arising from the development the allotments, including future land uses as anticipated by the Plan.*
 2. *Proposals shall identify any downstream works required to cater for the anticipated use of the allotments.*
- SUB-15 Stormwater Design Requirements
 1. *Subdivision to create new stormwater infrastructure shall not require additional mechanical pumping stations.*
 2. *Post development stormwater run-off rates shall not exceed those prior to development in catchments required to achieve hydraulic neutrality.*
 3. *New stormwater infrastructure shall be designed and constructed to a standard that ensures stormwater is not discharged into the reticulated wastewater system.*

4. *The design capacity of any piped stormwater facilities shall be sufficient to accommodate the surface water flows resulting without relying on secondary flowpaths in accordance with the Table 3 below.*

- SUB-S16 Water Supply
- SUB-S17 Wastewater Requirements

These standards would apply under the current *Open Space Zoning* and would remain under this rezoning request to residential. The infrastructure effects of the site will be controlled by the Operative Whanganui District Plan.

13.4.1 Ms Beamsley has provided her assessment of the flooding / overland flow paths and serviceability of the site. I have provided an excerpt of her comments under the respective headings below based on the report attached as Appendix 7.Flooding and overland flow paths

The site does not have a flood hazard identified by WDC. However, as noted earlier the site contains an overland flow path – see Figure 7 below:

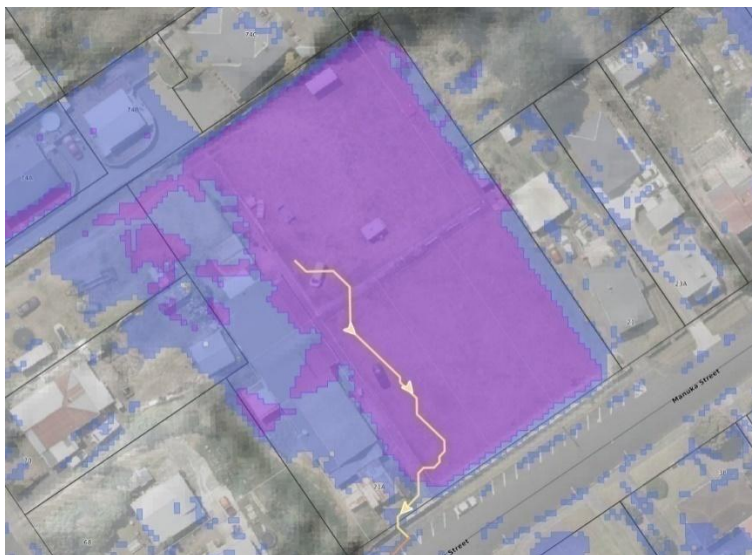


FIGURE 7, OVERLAND FLOW PATHS PROVIDED BY WDC

Ms Beamsley states that

“Any development will need to integrate into the surrounding landform and manage the flows arriving from the upstream catchment. This can be achieved through earthworks to raise site levels, remove the depression area, provide access to new lots, establish flood free building platforms and establish flow paths through or around the site. These are standard activities for a residential development and can be supported by designs completed for resource consent”

Ms Beamsley has made it clear that these are standard sorts of activities for residential development and that overland flow paths could be incorporated into future developments. Specifically, this would be controlled by S106 of the RMA at resource consent stage.

13.4.2 Stormwater

Any new residential development will need to comply with the Whanganui District Council Land Development and Subdivision Engineering Document 2016, NZS4404, and the Building Code. Any future subdivision will need to adhere to all the requirements of the Operative District Plan listed above.

Ms Beamsley had confirmed that stormwater can be appropriately controlled at resource consent stage stating that through either soakage or attenuation “*adverse effects from any proposed residential development on the public stormwater network would be avoided... Further detail of site suitable solutions can be developed for future Resource Consent applications.*”

13.4.3 Wastewater

I have provided an excerpt from p.3 of Appendix 7 which identifies that the residential rezoning of the site is appropriate and can be appropriately managed upon future development. Specifically, any future development is required to align with Whanganui District Councils engineering standards which controls servicing matters.

There is a 225Ø public gravity main in Manuka Street. Survey was undertaken for the upstream manhole and confirmed a depth of 3.03m to invert.

Based on the available asset information (available online at WDC maps and survey), the capacity of the existing Council main in front of 21A Manuka Street is expected to be approximately 41 L/s. Peak wet weather flows from the catchment draining to this pipeline are 4 L/s.

The Council main is deep, being around 2.5 – 3.0m below the road surface thus providing suitable depth for additional connections from any proposed development.

Based on the residual capacity in the Council wastewater main and available depth it is feasible to connect new residential dwellings at the site to the network without any significant downstream effects.

Council has subsequently considered Ms Beamsley’s serviceability assessment of the site and raised concerns about wastewater capacity. A preliminary response was provided to the Council in response to further information dated 3 October 2025. This is attached at Appendix 13.

Ostensibly this preliminary response indicated that it was unnecessary to provide a detailed wastewater capacity analysis as the Operative District Plan enabled this to be assessed in detail at the resource consent stage. The Council did not accept this position.

Consequently, the applicant has contributed towards the costs of a wastewater capacity assessment commissioned by the Council and undertaken by GHD. This assessment is attached at Appendix 14 and notes the following:

The model did not predict any changes in pipe surcharge for the dry weather system performance and no notable change in manhole spilling was predicted in the wet weather system performance. A slight increase in overflow at the Tregenna Street pumpstation and Beach Road pumpstation was predicted, although this represents only a small percentage increase (<0.5%).

Although the isolated contribution of the development is relatively minor, the cumulative impact of city-wide growth is impacting network performance. This is seen, for example, in the activation of the Tregenna Street pumpstation overflow during dry weather flows in the base scenario which includes infill development. The model also indicates portions of the network downstream of the development that are already surcharging.

Council has noted that if the applicant agrees to a capital contribution to upgrade relevant wastewater pump stations the Council believes that the site can be suitably serviced for wastewater and rezoned. The scale and form of this capital contribution can be agreed outside the scope of this plan change particularly given the need to assess wastewater management as part of a future resource consent as outlined in the Further information response attached in Appendix 13.

13.4.4 Water

The proposed rezoning has been considered appropriate in terms of connecting to the councils reticulated water network. Please see an excerpt of Ms Beamsley's assessment below. Specifically, any future development is required to align with Whanganui District Councils engineering standards which controls servicing matters.

Any residential development on the site can be serviced via a new connection to the existing Council main with the details of the water reticulation to the property to be resolved in a future Resource Consent application.

13.4.5 Conclusion

This Plan Change Request does not propose any development at this time and the assessment has been done at a high level to assess the appropriateness of residential development generally. The assessment above as well as Ms Beamsley's analysis identifies that the site is appropriate for residential development. In addition, should a subdivision take place, the site will be controlled by those standards noted above.

13.5 Contaminated Land Effects

The bowling green is classified as A10 on the Hazardous Activity and Industry List (HAIL) for *persistent pesticide bulk storage or use including sport turfs, market gardens, orchards, glass houses or spray sheds.*

A Preliminary and Detailed Site Investigation was completed by LDE on the *Appendix 5* as an activity on the HAIL had been undertaken on the site. Soil sampling and analysis found that "no soil is present at the site that exceeds soil contaminant standards applicable to residential land use and no further testing is considered necessary." LDE have concluded that:

"Due to the presence of arsenic above typical background concentrations as well as detections of OCPs (albeit below concentrations applicable to 'residential 10% produce' land use), the proposed activity would therefore be considered a "Controlled activity" under Regulation 9 of the NES. Any soil being disposed offsite will need to be disposed at a managed fill (Class B) landfill as it does not meet cleanfill status. For these reasons,

the proposal is not considered to have any adverse effect on the environment in relation to land contamination.”

This Plan Change Request does not propose any development on the site and will not implement the recommendations of this report at this time. However, this report does identify that the site can be used for residential purposes. Any effects of redevelopment in future will be appropriately controlled by the NES-CS at such a time.

13.6 Natural Hazard Effects

The site is not within any of the natural hazard overlays in the Whanganui District Plan. The site is located within an area identified as having *moderate liquefaction susceptibility*. Mr Davidson from Land Development Engineering Limited (“LDE”) has assessed the liquefaction potential and determined the soakage rates. Mr Davidson confirms *that buildings can be safely located within site, provided that appropriate designs / site management are undertaken in accordance with the appropriate codes and regulations, and council requirements*.

In addition, Ms Beamsley from Orogen has concluded that earthworks will be required to provide building platforms and vehicle access whilst also considering overland flow path management around or through the site. These can be completed at the time of development through building and resource consent requirements.

13.6.1 Geotechnical Effects

This Private Plan Change Request will not change the existing controls of the Whanganui Operative District Plan.

The following existing standards will remain:

- EW-S2 earthworks shall not create or exacerbate erosion or instability
- SUB-S6 each lot shall have one building platform which is not subject to erosion, debris, subsidence, or slippage, meets requirements for ‘good ground’
- SUB-S11 fill shall be certified as being suitable ‘good ground’,
- Rules in General Residential Zone are linked to the EW standards under GRZ-S10

The controls of the Operative District Plan are sufficient to avoid, remedy, or mitigate effects of a proposal at resource consent stage. LDE have provided a Geotechnical Report attached as Appendix 8 which confirms this.

13.6.2 Flooding and Overland Flow Effects

The site is prone to flooding and contains an overland flow path. As outlined above and in Appendix 7 Ms Beamsley from Orogen concludes that:

“The arrangement of the residential dwellings, onsite services and confirmation of connection points can be resolved through a future Resource Consent application. Earthworks will be required to provide building platforms and vehicle access whilst also considering overland flow path management around or through the site. These will need to include geotechnical considerations for the identified liquefaction risks.”

13.6.3 Conclusion

For the reasons outlined above the proposed rezoning request can be considered appropriate and that any effect could be adequately mitigated / avoided through detailed designs at development stage.

13.7 Loss of Open Space Effects

The site was historically used as the Castlecliff Bowling Club. This was closed in 2019 due to dwindling member numbers and increased expenses. Being a former, privately owned bowling club, the site is not subject to the provisions or requirements of the Reserve Act 1977. The site had no public access. Therefore, the loss of *Open Space Zoned* land will not be of detriment to the public good.

There is adequate provision of open space and reserve land elsewhere in Castlecliff has and will continue to be open to the public. This includes

- The Castlecliff Domain – a reserve inclusive of a playground, rope climbing, flying fox, and a skate park.
- Castlecliff Coastal Reserve – 38ha Reserve.
- Lunden Park – playground equipment and grassed fields for sport activities.
- Matai Park

Figure 8 shows the first three of these parks within the local context.

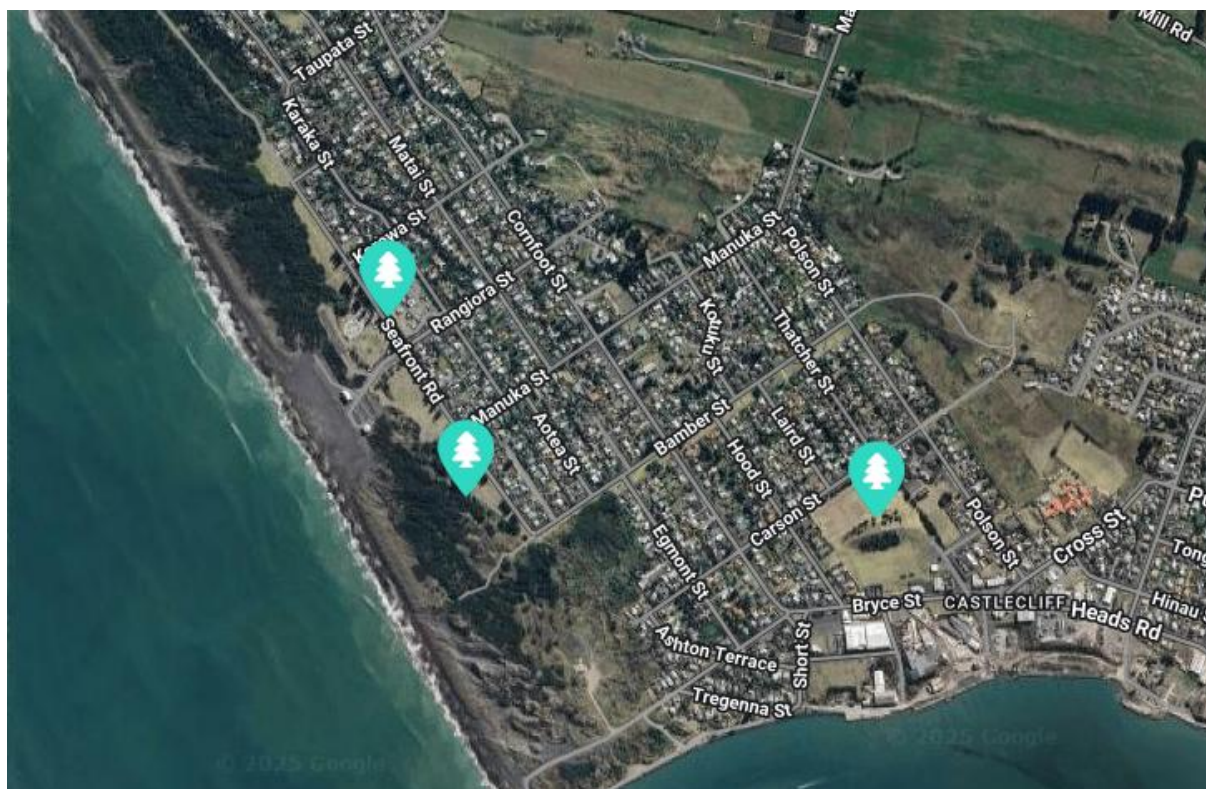


FIGURE 8: CASTLECLIFF PARKS AND RESERVES (WHANGANUI DISTRICT COUNCIL PARKS AND RESERVES MAP)

Castlecliff Bowling Club has now amalgamated with Gonneville-Castlecliff Bowling Club on 15 Caius Avenue, Gonville, Whanganui 5001. There is also the Castlecliff Golf Club to service the surrounding area.

Due to the private ownership of this site, the proposed rezoning will not result in a loss of public open space. Three parks and reserves within the Castlecliff area remain, which is adequate to service the surrounding area. For these reasons, the effects of losing *Open Space Zoned* land on the environment and any person is less than minor.

13.8 Effects on Cultural Heritage

“Historic Heritage” is defined in the Resource Management Act 1991 (the Act) as “those natural and physical resources that contribute to an understanding and appreciation of New Zealand’s history and cultures. It includes historic sites, structures, places and areas, archaeological sites, site of significance to Māori, including wāhi tapu, and surroundings associated with the natural and physical resources”.

No sites of cultural significance to iwi/ hapū or archaeological sites have been identified within the site nor are there any heritage sites listed on the Heritage New Zealand Pouhere Taonga List.

The applicant has contacted all relevant iwi and hapū groups within the rohe. A record of consultation can be found in Appendix 2. Engagement is currently underway with Ngā iwi o Taranaki to obtain hapū contacts.

13.9 Positive Effects

In assessing the effects of a proposal, there is a tendency to focus on negative effects however it is also important and appropriate to consider positive effects. For this Private Plan Change Request, the following positive effects have been considered:

- Castlecliff is experiencing a resurgence with community and council revitalisation projects and increased housing demand according to Hester Den Ouden – Whanganui District Council Senior Policy Planner. The proposal will increase the land capacity of Castlecliff to provide additional development capacity.
- Provision for a variety of different site types, sizes, and locations will enhance housing supply and choice.
- The rezoning will support managed growth and urban consolidation
- The inclusion of additional vehicle crossing width and size controls in addition to the other land transport matters of the District Plan will result in positive effects, specifically in regard to complimenting and adding to the existing residential environment and controlling the land transport network.
- The proposal will utilise existing public infrastructure e.g. public and active transport routes and the existing reticulated network.

13.10 Summary of Effects

In summary, the actual and potential effects of the proposed rezoning on the environment arising from the proposed new provisions of the Whangarei District Plan that would apply, are appropriate for the following reasons:

- The adoption of council's General Residential Zone controls will uphold the existing residential character.
- The General Residential Zone has higher standards of noise control than the Open Space Zone. The noise effects of the Plan Change Request are positive.
- The adoption of Council's General Residential Zone controls will allow for integration of future development with the surrounding streetscape.
- There will be a minor change to the rules that restrict the site (the inclusion of vehicle crossing requirements) this is appropriate for the change in land use from open space to residential. The effects of this change are positive.
- Ms Beamsley confirmed that the site is appropriate, with regard to three waters infrastructure, for future residential development. Should a subdivision take place, the site would also be controlled by those provisions of the subdivision chapter.
- A Detailed Site Investigation has been prepared by Jeff Davenport at Land Development Engineering Limited identifying the site as appropriate for residential development. By any means, the site will be controlled by the NES-CS upon future development.
- The servicing and geotechnical reports attached as *Appendices 8 and 9* outline that any natural hazard effect could be adequately mitigated / avoided through detailed designs at development stage. The effects are negligible.
- Due to the private ownership of this site, the proposed rezoning will not result in a loss of public open space. There are three parks and reserves available to service the Castlecliff area.
- Engagement with iwi and hapū is ongoing. At this time no objections or concerns have been raised.

14 Conclusion

This report has been prepared in support of IWIK Trusts Plan Change Request to the Whanganui District Plan to rezone the land at 21A Manuka Street, Castlecliff to the General Residential Zone. The plan change will apply the existing plan provisions of the General Residential Zone to the future development of the site.

The request has been made in accordance with the provisions of Schedule 1 and Section 32 of the Resource Management Act 1991. Based on an assessment of environmental affects informed by a wide range of specialist assessments, it is concluded that the Proposed Plan Change will uphold the existing residential environment to ensure it, and those persons within it, are not adversely impacted. The Proposed Plan Change will also have positive effects on the environment in terms of social, environmental and economic wellbeing on the Castlecliff neighbourhood and wider Whanganui environment. Furthermore, there are no reasons why the Proposed Plan Change Request should be declined.

An assessment against the provisions of s32 of the RMA is provided in Appendix 3. This includes an analysis with respect to the extent to which the objectives of the plan change are the most appropriate to achieve the purpose of the RMA and an examination that concludes that the provisions of the plan change are the most appropriate way to achieve the objectives, with respect to other viable options available.

For the above reasons, it is considered that the Proposed Plan Change aligns with the sustainable management principles outlined in Part 2 of the RMA and should be accepted or adopted and approved.

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