



**WHANGANUI  
DISTRICT COUNCIL**  
Te Kaunihera a Rohe o Whanganui

# **Plan Change 53 Springvale Structure Plan**

## **Submissions Received**

**From:** [Whanganui District Council](#)  
**To:** [kharris@mosston.school.nz](mailto:kharris@mosston.school.nz)  
**Subject:** Submission on Whanganui District Council publically notified plan change number 53.  
**Date:** Monday, 8 July 2019 1:19:15 PM

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## **Thank you for your submission to Plan Change 53 – Springvale Structure Plan.**

**As you have indicated you wish to  
speak to your submission, we will  
contact you after the submission  
period closes to advise hearing dates**

Reference number	453071319191408
Full name	Kylie Harris
Email address	kharris@mosston.school.nz
Postal address	211 MOSSTON ROAD WESTMERE WHANGANUI 4501
Daytime phone number	0274427096
1. (a) I could not not gain an advantage in trade competition through this submission.	
1. (b) I 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.	
2. The specific provisions of the proposed plan change that my submission relates to: Section 32	
3. My submission is that: Mosston School supports the Proposed Plan Change 53 (PC53) - Springvale Structure Plan, its commitment to enhance community wellbeing with the provision for walking and cycling shared pathways, inclusion of reserves and	

open spaces, and the development of the Titoki Wetland. While the proposed PC53 section 32 report addresses 'potential impacts on the heavy vehicle route as well as potential ecological and cultural values', PC53 nor the Traffic Impact Assessment (TIA) completed to support the document address the potential negative impact the increased heavy vehicle traffic flow on existing facilities such as Mosston School. With reference to the Whanganui Urban Transportation Strategy (2011) and its objectives and key actions relating to parking, vehicle loading, improved access and to enhance and promote public health and safety, Mosston School expresses the following concerns: - The detriment to student safety - The negative impact of increased congestion to vehicle movement and access to Mosston School - WDC traffic flow data shows an average increase of 20% in traffic flow within Whanganui City limit over the 2018/19 period which is only going to increase if the springvale structure plan is implemented.

4. I seek the following decision from the Council:  
Mosston School wishes to propose the following are considered for inclusion to improve the health and safety of the area for our school children: - Development of a Bus parking bay or layby and a drop-off area outside Mosston School - Inclusion of a pedestrian crossing outside of Mosston School - An extension of the pathway/cycle way heading out of town on Springvale Road and onto and down Mosston Road on the left hand side - A shared pathway linking Mosston School to the proposed walking and cycling shared pathway

5. I do wish to be heard in support of this submission.

6. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Supporting documents

File(s) not provided

**From:** [Whanganui District Council](#)  
**To:** [ryan.carter51@outlook.com](mailto:ryan.carter51@outlook.com)  
**Subject:** Submission on Whanganui District Council publically notified plan change number 53.  
**Date:** Tuesday, 9 July 2019 11:36:40 PM

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## **Thank you for your submission to Plan Change 53 – Springvale Structure Plan.**

**As you have indicated you wish to  
speak to your submission, we will  
contact you after the submission  
period closes to advise hearing dates**

Reference number	607072336193909
Full name	Mr Ryan Carter and Ms Nadia Ballantine
Email address	ryan.carter51@outlook.com
Postal address	134 MOSSTON ROAD WESTMERE WHANGANUI 4501
Daytime phone number	0274777213
1. (a) I could not not gain an advantage in trade competition through this submission.	
1. (b) I am 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.	
2. The specific provisions of the proposed plan change that my submission relates to: The provision to rezone WDC owned land to reserves and open spaces The provision to include restricted access boundary	
3. My submission is that: We support the Proposed Plan Change 53 (PC53) - Springvale Structure Plan	

commitment to enhance community wellbeing with the provision for walking and cycling shared pathways and to rezone small pockets of land vested as council reserve, from Residential to Reserve and Open Spaces. A Reevaluation of a chapter 4 - Section 32 Evaluation with reference to the amended Springvale Structure Planning Map (PC53) is required. Review of the proposed changes to Plan policies and rules to ensure efficient, integrated and sustainable residential development of rezoned rural lifestyle properties is possible. It is unrealistic to require all new dwellings on sites adjacent to Mosston Road to be required to obtain alternative access. The preferred options outlined in chapter 4 - Section 32 Evaluation of the PC53 Section 32 Report are based on a pre April 2018 version of the proposed Springvale Structure Planning map (PC53) which has since been modified significantly during public consultation, infrastructure redesign and review, making the preferred options in some instances no longer valid. In particular item 4.3.3 'Protection of Heavy Vehicle route'.

4. I seek the following decision from the Council:

- Review the need to amend policy 4.3.10 to limit access to Mosston Road - Do not include Rule 12.4.3 to make new vehicle access and intensification of existing access to Mosston Road a non-complying activity

5. I do wish to be heard in support of this submission.

6. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Supporting documents

File(s) not provided

**From:** [Whanganui District Council](#)  
**To:** [affordplumb@outlook.com](mailto:affordplumb@outlook.com)  
**Subject:** Submission on Whanganui District Council publically notified plan change number 53.  
**Date:** Wednesday, 10 July 2019 5:03:23 PM

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## **Thank you for your submission to Plan Change 53 – Springvale Structure Plan.**

**As you have indicated you wish to  
speak to your submission, we will  
contact you after the submission  
period closes to advise hearing dates**

Reference number	854071703192110
Full name	Craig Jonathan Moffitt
Email address	affordplumb@outlook.com
Postal address	61B Koromiko Road, Gonville Whanganui 4501
Daytime phone number	0223118093
1. (a) I could not not gain an advantage in trade competition through this submission.	
1. (b) I am 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.	
2. The specific provisions of the proposed plan change that my submission relates to: Proposed road/ designation.	
3. My submission is that: I am not opposed to the Plan change but I am concerned that I will be unreasonably disadvantaged as the proposed road/ designation will go through my property including right through my house. This will cause me to loose my	

house and studio as well as the land that Council requires for the new road. I will also loose the sheds on my land as the designation is indicated over all these buildings. I support the proposed park as notified in the structure plan.

4. I seek the following decision from the Council:

I want to be fairly compensated for the replacement value of the existing house, studio and sheds as well as the land that Council requires for the new road. Council adopt the plan change to include the park as notified.

5. I do wish to be heard in support of this submission.

6. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Supporting documents

File(s) not provided

**From:** [Whanganui District Council](#)  
**To:** [roly.h@xtra.co.nz](mailto:roly.h@xtra.co.nz)  
**Subject:** Submission on Whanganui District Council publically notified plan change number 53.  
**Date:** Thursday, 11 July 2019 5:58:26 PM

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## **Thank you for your submission to Plan Change 53 – Springvale Structure Plan.**

**As you have indicated you wish to  
speak to your submission, we will  
contact you after the submission  
period closes to advise hearing dates**

Reference number	007071758192511
Full name	Roland Hiri
Email address	roly.h@xtra.co.nz
Postal address	8 ARAWA PLACE CASTLECLIFF WHANGANUI 4501
Daytime phone number	0272259996
1. (a) I could not gain an advantage in trade competition through this submission.	
1. (b) I am 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.	
2. The specific provisions of the proposed plan change that my submission relates to:	
3. My submission is that: I support the specific provisions of the proposed plan change	
4. I seek the following decision from the Council:	
5. I do wish to be heard in support of this submission.	



6. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Supporting documents

File(s) not provided

**From:** [Whanganui District Council](#)  
**To:** [Geoff@extol.co.nz](mailto:Geoff@extol.co.nz)  
**Subject:** Submission on Whanganui District Council publically notified plan change number 53.  
**Date:** Thursday, 11 July 2019 7:47:49 PM



## Thank you for your submission to Plan Change 53 – Springvale Structure Plan.

Reference number	281071947194811
Full name	Geoff Bonner
Email address	Geoff@extol.co.nz
Postal address	111 Mosston Road Wanganui
Daytime phone number	0272236811
1. (a) I could not not gain an advantage in trade competition through this submission.	
1. (b) I am 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.	
2. The specific provisions of the proposed plan change that my submission relates to: Rezone Rural Lifestyle land to Residential, and some land owned by Council to Reserves and Open Space Zone.	
3. My submission is that: I oppose the rezoning of all the land from rural lifestyle to residential - the original Springvale structure plan from April 2018 prepared by GHD for the WDC on page 33 section 4.7 land use had a buffer zone of rural lifestyle between Mosston road and the rest of the Springvale residential zone. In this plan change this has been remove and all land is zoned as residential. I represent Extol engineering - Hayman industries - Todd Augers and equipment - MTS projects - Holland engineering all base at 111 Mosston Road Wanganui. Our site has been a engineering and manufacturing premises for over 40 years. The nature of our business is heavy engineering and metal fabrication. When we moved to this site 7 years ago we did our due diligence and checked zoning and future plans for the area with the WDC planners, we were primarily concerned about the rest home opposite us and their future growth plans, we were assure that there would be no	

further encroachment towards Mosston road and that Fitzherbert ave extension would cut across their driveway creating a larger buffer zone between our premises and any residential housing. We have a excellent working relationship with all our neighbours currently. We are concerned that by moving the intersection of Mosston Road and Fitzherbert Ave in the direction of Mosston school and rezoning the land residential that now rather than having one or 2 extra neighbours we could be landed with 20 or 30. We do make noise and do not believe that having highly incompatible activities next door to each is sound planning. Long after these planners and developers leave we and the new residents with be left to deal with the fallout.

4. I seek the following decision from the Council:  
That they reconsider the plan and change back to the original GHD plan and have a buffer of rural lifestyle zoning along Mosston road, but more specifically from the Fitzherbert ave extension to the proposed reserves and open spaces zone on its Castlecliff side. I also seek that they reconsider the entrance to the rest home from Mosston Road and have it coming off Fitzherbert Ave as per the attached sketch.

5. I do not wish to be heard in support of this submission.

6. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Supporting documents

[Council notification.pdf](#) - Received

**From:** [Whanganui District Council](#)  
**To:** [nicola.hine@firstgas.co.nz](mailto:nicola.hine@firstgas.co.nz)  
**Subject:** Submission on Whanganui District Council publically notified plan change number 53.  
**Date:** Friday, 12 July 2019 11:57:30 AM

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## **Thank you for your submission to Plan Change 53 – Springvale Structure Plan.**

**As you have indicated you wish to  
speak to your submission, we will  
contact you after the submission  
period closes to advise hearing dates**

Reference number	958071157192812
Full name	First Gas Limited, Nicola Hine
Email address	<a href="mailto:nicola.hine@firstgas.co.nz">nicola.hine@firstgas.co.nz</a>
Postal address	PRIVATE BAG 2020 NEW PLYMOUTH NEW PLYMOUTH 4340
Daytime phone number	0276471531
1. (a) I could not not gain an advantage in trade competition through this submission.	
1. (b) I am 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.	
2. The specific provisions of the proposed plan change that my submission relates to: Please refer to document attached.	
3. My submission is that: Please refer to document attached.	

4. I seek the following decision from the Council:  
Please refer to document attached.

5. I do wish to be heard in support of this submission.

6. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Supporting documents

[PC53 - Springvale Plan Change - FGL Submission July 2019.pdf](#) - Received

**First Gas Limited**

42 Connett Road West, Bell Block  
Private Bag 2020, New Plymouth, 4342  
New Zealand

P +64 6 755 0861

F +64 6 759 6509

12 July 2019

Whanganui District Council  
[via online submission]

**Attention: District Plan Team**

**Submission by First Gas Limited: Plan Change 53 Springvale Structure Plan**

Please find following First Gas Limited (First Gas) submission on the proposed Plan Change 53, Springvale Structure Plan. First Gas has existing assets within and adjacent to the physical extent of the Proposed Plan Change.

We seek that the content of this submission be factored into further recommendations and decision-making deliberations, to the extent that the Proposed Plan Change includes provisions which protect existing gas assets of regional and national importance and not restrict nor compromise our ongoing operation, maintenance and upgrade, including access.

Yours faithfully



**Nicola Hine**  
**Land & Planning Advisor**

**DDI** 06 215 4025

**M** 027 647 15331

Nicola.hine@firstgas.co.nz

## Introduction to Submitter:

### First Gas Limited

First Gas purchased the gas transmission network from Vector Gas Ltd on 20 April 2016 and is now the owner and operator of the gas transmission network. First Gas is Vector Gas Ltd.'s successor and has been confirmed as a Requiring Authority. Since purchase of the gas transmission network, First Gas have subsequently purchased some gas distribution assets and other gas related infrastructure across the North Island.

The First Gas network contains 2,504kms of high pressure gas transmission pipes (including the Maui pipeline) and approximately 4,800 kms of gas distribution pipes in the North Island, with gas distribution networks in more than 40 North Island towns and cities, providing natural gas to commercial and domestic gas customers.

## Intent of Submitter:

In the Resource Management Act context, the submitter does not seek to unreasonable restrict future development, but seek that their regionally and nationally significant assets are:

- Protected from other land use activities, including subdivisions which may enable future land use; and
- Enabled (including access) to be safely, efficiently and effectively operated, maintained, upgraded, and developed.

## Overview of Policy Framework Relating to Gas Infrastructure within Extent of the Proposed Plan Change:

Matters for the Council to consider in respect of the Proposed Plan Change include consistency with the Operative District Plan's direction and framework and the Regional Policy Statement. To this end, key provisions of note in the Regional Policy Statement for Whanganui contained in the One Plan 2014 are:

*Objective 3-1: Infrastructure and other physical resources of regional or national importance.*

*Have regards to the benefits of infrastructure and other physical resources of regional or national importance by recognising and providing for their establishment, operation, maintenance, and upgrading.*

*Policy 3-1: Benefits of Infrastructure and other physical resources of regional or national importance.*

*(a) The regional council and territorial authorities must recognise the following infrastructure as being physical resources of regional or national importance:*

*(iii) pipeline and gas facilities used for the transmission and distribution of natural and manufactured gas*

*(c) The Regional Council and Territorial Authorities must, in relation to the establishment, operation, maintenance, or upgrading of infrastructure and other physical resources of regional or national importance...have regard to the benefits derived from those activities.*

*Policy 3-2 Adverse effects of other activities on infrastructure and other physical resources of regional or national importance.*

*Territorial Authorities must ensure that adverse effects on infrastructure and other physical resources of regional or national importance from other activities are avoided as far as reasonable practicable, including by using the following mechanisms:*

*(f) ensuring safe separation distances are maintained when establishing rules and considering applications for buildings, structures and other activities near transmission gas pipelines...*

## **Understanding of Proposed Plan Change**

The Proposed Plan Change seeks to rezone a mixture of Rural Lifestyle, Reserves and Open Space to Residential, Reserves and Open Space and provide for key infrastructure. These changes are sought to meet projected residential demand in Springvale for the next 50 years.

### **Confirmation of Assets within Extent of Proposed Plan Change:**

First Gas has high pressure gas pipelines within and directly adjacent to the Springvale Structure Plan area. The pipeline traverses Proposed Reserves and Open Space Zone, Proposed Shared Path, existing Reserves and Open Spaces Zone, Existing Drainage Designation Zone, and adjoins Proposed Stormwater Detention Area. First Gas has above ground infrastructure, being a main line valve, which is not included within the Springvale Structure Plan but is directly adjacent to this area and is therefore affected by the proposed plan change.

### **Submission Statement:**

First Gas supports in part the Proposed Plan Change, but also seeks to ensure it provides an appropriate framework to protect gas assets within the extent of the Proposed Plan Change and enable its ongoing operation, maintenance, and upgrading, which includes access to the gas infrastructure. This framework is required to ensure First Gas are able to continue to comply with its industry standard for the operation and maintenance of gas and liquid petroleum pipeline assets – AS2885.

In this context, specific submission points are made following. Underpinning the reasons for the relief sought is that fact the Proposed Plan Change must give effect to the Regional Policy Statement which confirms the gas network is regionally and nationally important infrastructure. The gas network needs to be both protected and enabled.

First Gas seeks that the content of this submission be factored into future decision-making deliberations, to the extent that the Proposed Plan Change includes provisions which protect this gas infrastructure and does not restrict nor compromise its ongoing operation, maintenance and upgrade, including access.

### **Specific Submission Points:**

#### Proposed Reserves and Open Space Zones

First Gas supports the Proposed Reserves and Open Space Zones as shown located in the southern area of the Springvale Structure Plan.

#### **Reason:**

First Gas supports open spaces overhead of and within the vicinity of underground gas pipelines, to ensure the gas network is protected and enabled.

#### Proposed Residential Zone

First Gas supports the location of the Proposed Residential Zone as shown on the Springvale Structure Plan.

#### **Reason:**

First Gas supports residential activity to be located a safe separation distance from gas infrastructure, being at least 20 metres from the centreline of underground transmission pipelines and 20 metres from the boundary of above ground infrastructure. This ensures the gas network is both protected and enabled, and avoids or mitigates conflict with existing pipelines.

#### Drainage and Stormwater Activities

First Gas seeks clarity on management of drainage and stormwater within the Existing Drainage Designation and Proposed Stormwater Detention Area, including the extent to which the design of these activities avoids or mitigates conflict with existing gas infrastructure and the ability for safe maintenance, inspection, and access of the existing gas infrastructure.



Reason:

To ensure the gas infrastructure is protected and enabled.

Proposed Low Earth Bund

First Gas seeks clarity on the design of the Low Earth Bund, in consideration of the extent to which the bund will avoid or mitigate conflict with existing pipelines, including the ability for maintenance and inspection of the existing pipeline.

Reason:

To ensure the gas pipeline is protected and enabled.

Proposed Shared Pathway

First Gas seeks clarity on the design and location of the shared pathway, in consideration of the extent to which the pathway will avoid or mitigate conflict with existing pipelines, including the ability for maintenance and inspection of the existing pipeline.

Reason:

To ensure the gas pipelines is protected and enabled.

Land Disturbance

First Gas seeks that land disturbance within 6 metres either side of the pipeline is a Permitted Activity within the Springvale Structure Plan.

Reason:

To ensure the existing gas pipeline is protected and enabled.

12 July 2019

Hamish Lampp  
Planning Manager  
Whanganui District Council  
PO Box 637  
**WHANGANUI 4500**

File ref: RAI 04 07  
2019/03123  
PAT:MLB

**By email only:**

[Brenda.O'Shaughnessy@whanganui.govt.nz](mailto:Brenda.O'Shaughnessy@whanganui.govt.nz)

Dear Hamish

## **HORIZONS SUBMISSION – PROPOSED PLAN CHANGE 53 – SPRINGVALE STRUCTURE PLAN**

### **1. INTRODUCTION**

- 1.1 Horizons Regional Council (Horizons) thanks the Whanganui District Council (WDC) for the opportunity to provide comment regarding Proposed Plan Change 53 (PPC51).
- 1.2 Horizons could not gain an advantage in trade competition through this submission.
- 1.3 The following submission considers the relationship between Horizons' One Plan (combined regional policy statement (RPS) and regional plans), and the need for the District Plan to give effect to the regional policy statement components and not be inconsistent with regional plan provisions, as set out in section 75 of the Resource Management Act 1991 (RMA). It also considers the contributions the proposed changes will make to the Regional Land Transport Plan's strategic priorities.

Kairanga

### **2. INTEGRATED PLANNING FOR GROWTH**

Marton

- 2.1 Horizons generally supports the structure plan approach to planning for growth that WDC has taken for the Springvale area. One Plan Policy 3-4 provides for Territorial Authorities to

Palmerston North

*...proactively develop and implement appropriate land use strategies to manage urban growth, and they should align their infrastructure asset management planning with those strategies, to ensure the efficient and effective provision of associated infrastructure.*

Taihape

Taumarunui

Wanganui

- 2.2 It is Horizons' view that the structure plan approach and supporting amended policies 13.3.35 to 13.3.38, which integrate the structure plan into the district plan framework, give effect to Policy 3-4. Horizons seeks the

Woodville

retention of the structure plan, and supporting district plan Policies 13.3.35, 13.3.36, 13.3.37 and 13.3.38 as notified.

### 3. TRANSPORT

- 3.1 Horizons supports the provision of walkways as well as new roading in the structure plan, and notes that this aspect of the structure plan is supported by updated rule 13.5.10 Transport. The multi-modal approach enables increases in active and public transport, supporting the reduction of private vehicle use. The approach aligns with the strategic direction of the Regional Land Transport Plan 2015-25 (2018 Review) (RLTP), in particular the strategic priorities

- An integrated walking and cycling network; and
- Effective, efficient, accessible and affordable multi-modal transport networks.

- 3.2 It is considered that the structure plan and supporting transport rule also give effect to One Plan Policy 3-7 *Energy efficiency*, which states that

*Territorial Authority decisions and controls on subdivision and land use must ensure that sustainable transport options such as public transport, walking and cycling can be integrated into land use development.*

Horizons therefore seeks the retention of Rule 13.5.10 as notified.

### 4. STORMWATER MANAGEMENT

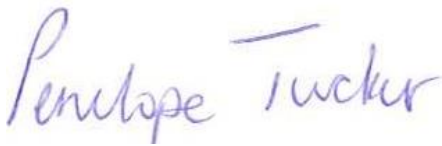
- 4.1 Horizons supports the provision for stormwater management in the structure plan through drainage designations and a stormwater detention area, and amended Policy 13.3.35(a) in particular. Manager Investigations & Design, Jon Bell, considers that while there is not a detailed stormwater management plan at this stage, details around the avoidance of hazards associated with stormwater, on this site, can be well managed through the later stages of the planning process - i.e. through the development a detailed stormwater management strategy as well as through the setting of minimum floor levels at a subdivision scale.

### 5. INDIGENOUS BIODIVERSITY

- 5.1 We acknowledge WDC's recognition of the Titoki Wetland (a threatened habitat) as an area of indigenous biodiversity of high ecological value through the structure plan, including measures to mitigate adverse effects of development on the wetland. Horizons has reviewed the ecological assessment and considers that it is consistent with our understanding of the site. We concur with the assessment in section 2.2.3 of the Section 32 Report that the approach is consistent with One Plan Policy 6-1(c).

## 6. CONCLUSION

- 6.1 In summary, Horizons generally supports PPC53 and the structure plan approach to development in the Springvale Area. We seek:
- i) the retention of the Springvale Structure Plan and the proposed amended supporting District Plan provisions identified above, as notified, insofar as they give effect to the One Plan and align with the RLTP; or
  - ii) any further, alternative, or consequential relief to give effect to the One Plan and align with the RLTP.
- 6.2 Horizons reserves the right to be heard in relation to this submission.

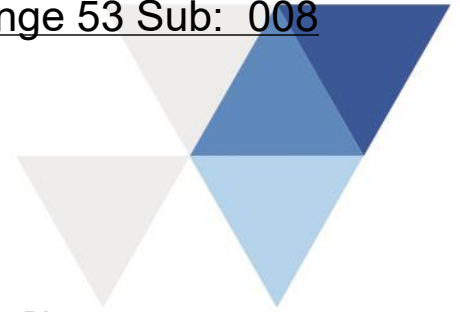


Pen Tucker  
**SENIOR POLICY ANALYST**

### Address for service:

Pen Tucker  
Horizons Regional Council  
Private Bag 11025  
**PALMERSTON NORTH 4442**

**Phone:** 0508 800 800  
**Email:** [pen.tucker@horizons.govt.nz](mailto:pen.tucker@horizons.govt.nz)



## Submission on Plan Change 53 – Springvale Structure Plan

To: Whanganui District Council

**Name of submitter:** Ministry of Education (the 'Ministry')

Address for service: C/- Beca Ltd  
85 Molesworth Street  
Wellington 6011

Attention: Marcus Bishop

Phone: (04) 460 1782

Email: Marcus.Bishop@beca.com

**This is a submission on the Plan Change 53 – Springvale Structure Plan ('PC53').**

### The specific parts of the Plan that the Ministry's submission relates to are:

The Ministry of Education has an interest, greater than the general public, in planned growth scenarios. Particularly, the Ministry is required to ensure that the impact of growth on local school networks are appropriately managed and provided for.

### Background:

The Ministry is the Government's lead advisor on the education system, shaping direction for education agencies and providers and contributing to the Government's goals for education. The Ministry's overall purpose is:

*'Lifting aspiration and raising education achievement for every New Zealander'*

Amongst other educational matters, the Ministry has a responsibility for managing all education property owned by the Crown. They also have a role in ensuring that education providers have the resources and support they need to deliver services to students. The safety of students and teachers is a high priority and as such, the Ministry monitors and responds to land use applications that may have a potential impact on the operation of a school or the safety of teachers and students.

Given the Ministry's overall purpose, it has a strong interest in the provision of educational facilities throughout the New Plymouth District generally. Planned growth scenarios throughout the country will have an impact on Ministry interests, with population growth exerting an increased pressure on existing schools and creating demand for new schools.

Tawhero School, St Marcellin Primary School and Rutherford Junior High School are within walking distance from the PC53 focus area and there a number of other schools within the surrounding area. PC53 would provide for approximately 700 new dwellings in the coming 50 years, which needs to be planned in conjunction with the Ministry to ensure that potential adverse effects on the existing local school network are appropriately managed and demand for new infrastructure is able to be recognised and planned for.

We note that it does not appear that the Ministry has been consulted with previously during the PC53 process.

**The Ministry of Education's submission is:**

The Ministry submits as **neutral** to the proposal, with the purpose of communicating the need for Ministry engagement.

**The Ministry of Education seeks the following decision from Whanganui District Council:**

The Ministry seeks to be engaged on the implementation of the Springvale Structure Plan, particularly as it relates to network demand, timing of staged development, impacts on school transport planning and avoiding, remedying or mitigating the potential adverse effects of PC53 on the local school network.

**The Ministry does not wish to be heard in support of their submission.**



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**Marcus Bishop**

*(Signature of person authorised to sign on behalf of the Ministry of Education)*

**Date:** 10/07/2019

**From:** [Whanganui District Council](#)  
**To:** [dflint@xtra.co.nz](mailto:dflint@xtra.co.nz)  
**Subject:** Submission on Whanganui District Council publically notified plan change number 53.  
**Date:** Friday, 12 July 2019 3:02:35 PM

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## **Thank you for your submission to Plan Change 53 – Springvale Structure Plan.**

**As you have indicated you wish to  
speak to your submission, we will  
contact you after the submission  
period closes to advise hearing dates**

Reference number	900071502193312
Full name	David and Jacque Flintoff
Email address	dflint@xtra.co.nz
Postal address	105 LINCOLN ROAD WESTMERE WHANGANUI 4501
Daytime phone number	0272631893
1. (a) I could not not gain an advantage in trade competition through this submission.	
1. (b) I am 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.	
2. The specific provisions of the proposed plan change that my submission relates to: The revision of the Springvale Structure Plan to include all or part of the Buxton Road area.	
3. My submission is that: See attached.	

4. I seek the following decision from the Council:  
See attached.

5. I do wish to be heard in support of this submission.

6. If others make a similar submission I would be prepared to consider presenting a joint case with them at any hearing.

Supporting documents

[Plan Change 53 - submission.pdf](#) -  
Received



**Submission from David and Jacque Flintoff for 3F Developments Limited**

**Whanganui District Council  
Proposed Plan Change 53 (Springvale Structure Plan)**

**12 July 2019**

## 1. INTRODUCTION

Whanganui District Council has publicly notified its Proposed Plan Change 53 calling for submissions to be lodged by 5.00pm Friday 12 July 2019.

This document is a submission to Plan Change 53 by D and J Flintoff for 3F Developments Limited.

The submitters are the owner of a portion of land located at 105 Lincoln Road, Whanganui. The property is described as Lot 2 DP 432958 being 9,455m<sup>2</sup> in area. It is located on the northern boundary of the area covered by Proposed Plan Change 53.

The submission seeks to have the property at 105 Lincoln Road incorporated back into the area over which Plan Change 53 (PC53) extends. That is, that it be included in the proposed Springvale Structure Plan as was originally proposed. The submission also suggests that the area to be incorporated back into Plan Change 53 appropriately extends beyond the submitters property although the submitter makes no representations on behalf of the owners of those properties.

## 2. THE SUBMITTERS SITE.

The submitters property is located on the southwest side of Lincoln Road as depicted in Figure 1 below.



Figure 1. Submitters Property and surrounds (WDC).

The property is 9,455m<sup>2</sup> in area and is largely vacant with the exception of a house located close to the southwest boundary. It has a very gentle slope down towards the southwest boundary. Along that boundary is a shallow drainage channel (Churton Creek) which flows down to the southeast through Whanganui.



Figure 2. Site from Lincoln Road. Note residential zoned properties along the left boundary.



Figure 3. Site from Lincoln Road driveway.



Figure 4. Site looking towards Lincoln Road.



Figure 5. Lincoln Road looking south. The white fence on the right is the submitters road boundary.



The surrounding area is characterized by typical suburban type developments on the southeast and northeast boundaries. To the west is a large property on which an old warehouse type structure stands being a site within the area of Plan Change 53. To the northwest are open largely lifestyle properties. That general pattern of development extends beyond the immediate boundary as shown in Figure 1 above.

Notably the 'residential' style of existing subdivisions along the southeast and northeast boundaries include lots as small as 300m<sup>2</sup> (17 Sherwood Place) up to 760m<sup>2</sup> (13 Chester Road). Typically these lots are around 600m<sup>2</sup>.

Existing services are available to the site as shown below in Figure 6. Both 205 and 107 Lincoln Road are already connected to the water supply.

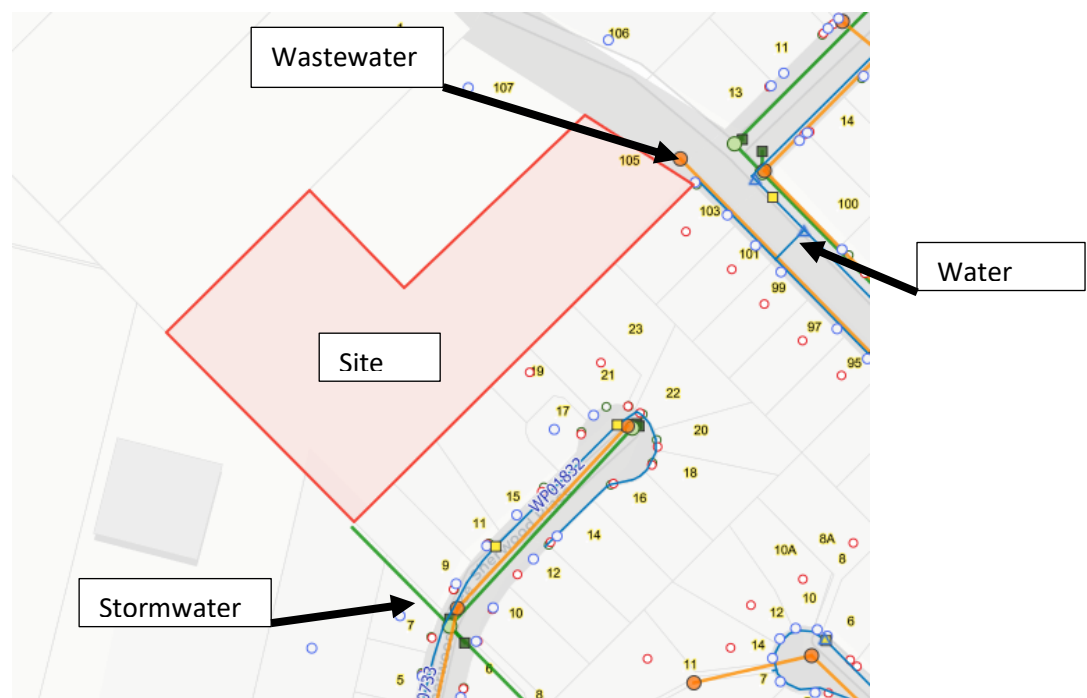


Figure 6. Services (WDC).

The submitter purchased the property in 2010 in anticipation of developing it in accordance the growth strategy information available at the time. A more recent and provisional layout of that potential development is shown in Figure 7 below. This layout is provisional and the submitter is unlikely to finalise any proposals until there is certainty on the outcome of this submission.

The layout makes provision for up to 11 lots one of which would be used as stormwater retention area to mitigate any possible additional flow into Churton Creek.

The provisional layout at this stage envisages the lots being accessed via private rights of way. The submitter accepts that should the submission be successful that may necessitate a revised layout incorporating a public road link to Fox Road as a link to the wider area to the south. It would also facilitate lots down to 400m<sup>2</sup> in area.

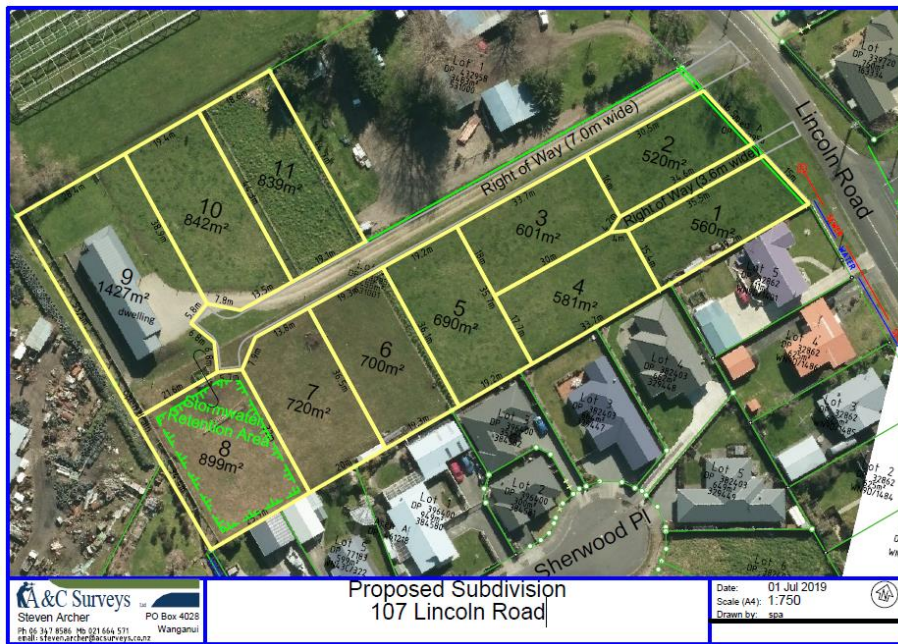


Figure 7. Draft Subdivision Plan.

### 3. THE APPLICANTS SUBMISSION.

The applicant submits that the property at 105 Lincoln Road should be incorporated into the area to be zoned as “Residential – Medium Density” under the provisions of Proposed Plan Change 53. This is consistent with Council documents that predate the proposed plan change including the Springvale Structure Plan and the Councils current Development Contributions Policy.

The applicant further submits that it would be appropriate to also include one or both of the following areas;

- All or part of the area northwest of 105 Lincoln Road along Buxton Road as is also shown to be within the Springvale Structure Plan.
- That area on the northwest side of Chester Road that already exhibits Residential zone characteristics but is zoned Rural Lifestyle.

The latter two areas are diagrammatically shown below.



Figure 8. Plan Change 53 Extension Areas

#### 4. Background.

For some years now the Whanganui District Council has been considering options to manage the residential growth of the City as set out in Section 3 of the Section 32 report on PC53. This culminated in the Springvale Structure Plan 2018 (SSP) which includes the submitters property and is part of the Operative District Plan.

The SSP identified the submitters property for future medium density residential development for the most part with an area to be set aside for open space and an indicative road through the site.

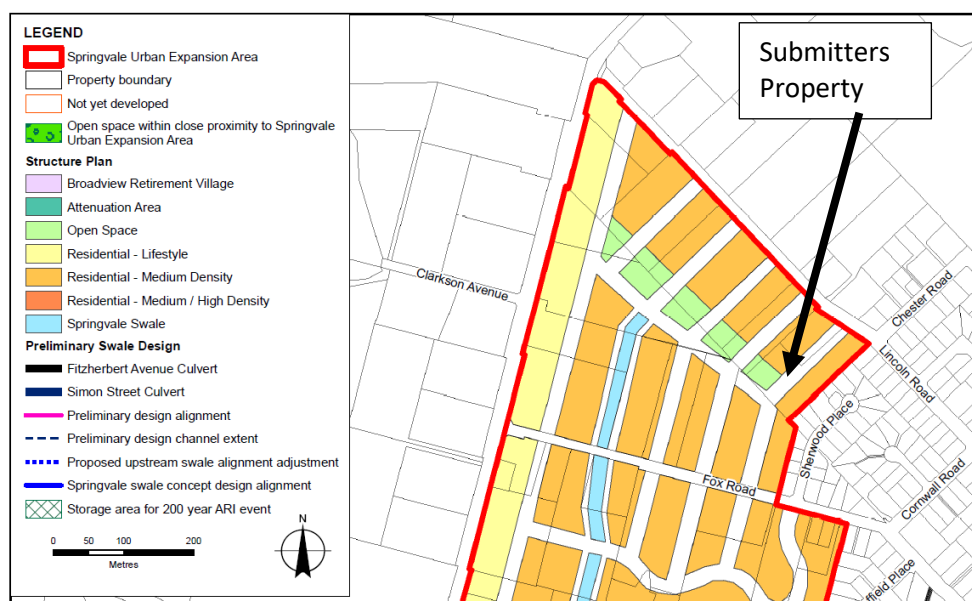


Figure 9. Extract of Springvale Structure Plan – Appendix A (WDC).

The submitters property was identified as potentially being in phase 3 of a 7 phase development process.

The SSP concluded that:

*Based on the key findings it is concluded that the Study Area is suitable for residential development, and that if developed in accordance with the principles set out and incorporating key infrastructure as highlighted will result in a high quality and desirable residential area. More detailed investigations along with consultation will need to be undertaken to determine how the identified development blocks come forward.*

Whilst the above is a selective summary of the SSP it serves to identify that the submitters property had been included in the growth area examined as part of a comprehensive assessment of the growth potential of the City.

The submitters, as a consequence of the above and past meetings with staff, have had a long understanding that the site has recognized development potential. They have furthermore been intending for some time, in reliance on the above, to give effect to that potential. The removal of the Buxton Road area from the Plan Change was neither expected nor is supported.

## 5. Operative District Plan provisions

The submitters property is zoned under the Operative District Plan as Rural Lifestyle as are the surrounding properties except those to the southeast which are zoned Residential as shown in Figure 10 below.

The properties on the northwest side of Chester Road opposite the submitter's property are also zoned Rural Lifestyle notwithstanding their residential characteristics.

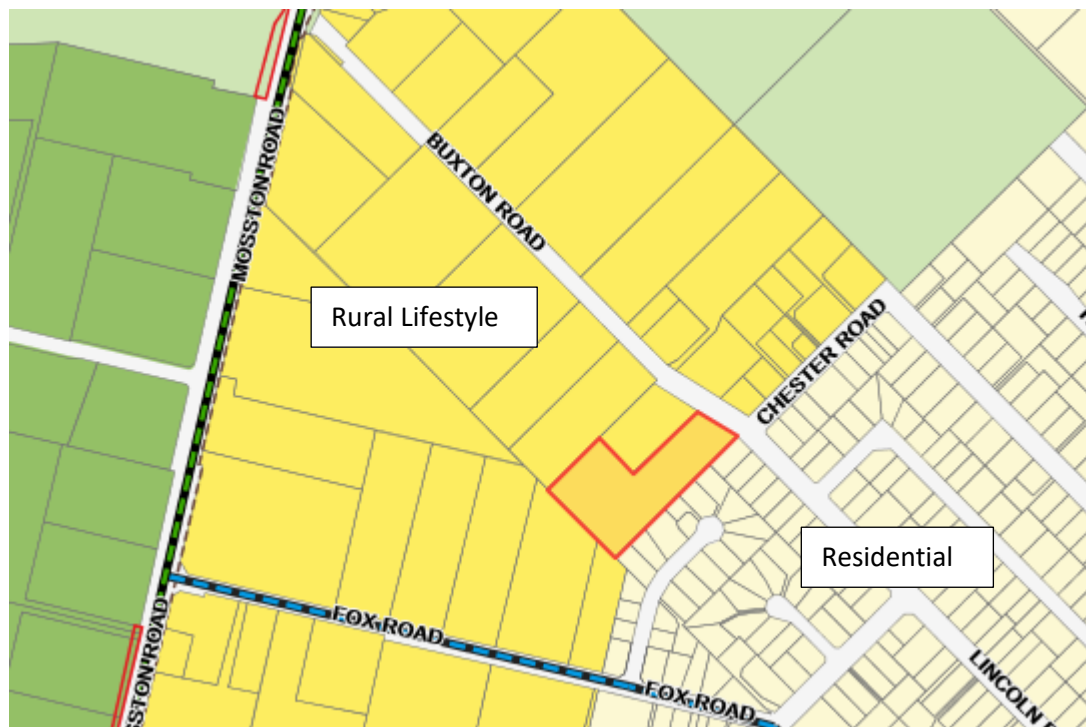


Figure 10. Zoning (WDC).



The area is also partially overlaid by the Springvale Indicative Structure Plan (Figure 11).

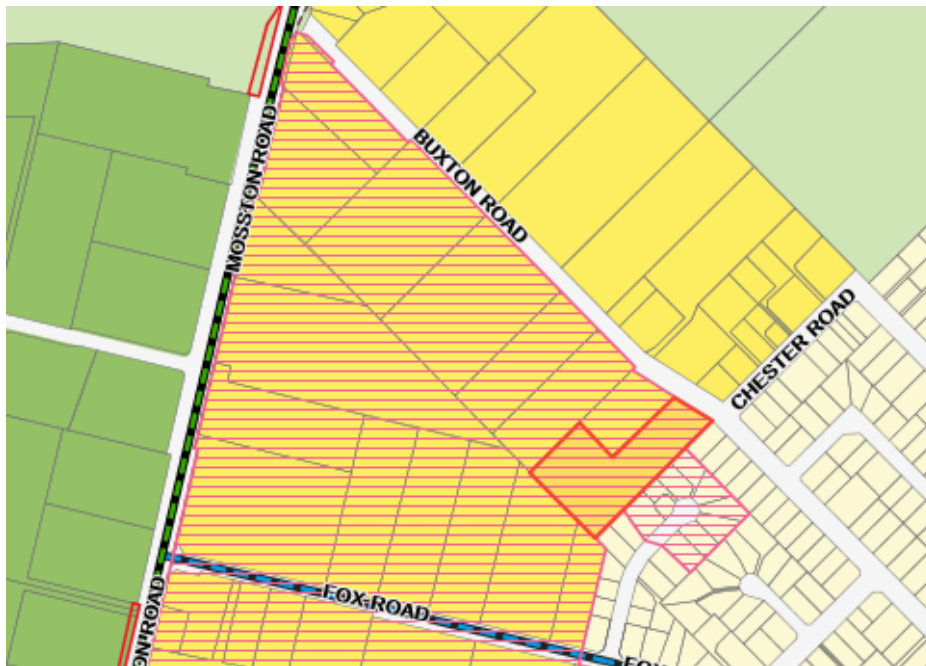


Figure 11. Springvale Indicative Structure Plan overlay – red horizontal hatch (WDC).

Whilst the submitters property falls within the SSP overlay those provisions do not apply to it at present. That is, subdivision of Rural Lifestyle land in the Springvale Indicative Future Development area is only a discretionary activity where it;

- i. Gains legal and physical access from Kelsi Street; and*
- ii. Is in general accordance with the key infrastructure linkages and indicative roading layout, detailed in the Springvale Indicative Development Plan.*

As such, subdivisions and development of the land not with in the above provisions is subject to the Rural Lifestyle rules and standards only. These provisions allow the subdivision of Rural Lifestyle zoned land down to 5,000m<sup>2</sup> as a restricted discretionary activity. Any subdivisions of land to a smaller size defaults to a non-complying activity.

Consequently, if the Plan Change 53 becomes operative as proposed, the submitters site will remain zoned as Rural Lifestyle and the subdivision envisaged at present will be for a non-complying activity. This is notwithstanding the long standing indicative potential of its use for residential purposed as found in Council documents.

Any dwelling on a lot of less than 5,000m<sup>2</sup> zoned Rural Lifestyle is also not permitted without resource consent. As such even if the site were subdivided as proposed and as a non-complying activity each site would then be subject to a resource consent requirement to construct a dwelling on it.

The area to the northeast of the site along Chester Road consists of lots that are generally residential in nature notwithstanding the fact that they are also zoned Rural Lifestyle and are subject to the rules and standards of that zone. As a result whist they exhibit residential

characteristics they are not subject to the residential zone rules and standards as would be appropriate.

Furthermore, the ongoing residential development of that area on Chester Road would under the present provisions of the District also be a non-complying activity. Given that the area is already developed for all intents and purposes as a residential area it seems that it would be prudent to bring the zoning into line with the actual development on the ground. It goes without saying that it is highly unlikely that the use of the land will ever revert to Rural Lifestyle type activities that it is zoned for.

#### **6. Proposed Plan Change 53 (PC53).**

The purpose of Plan Change 53 is to facilitate provision of land for residential development in the Springvale area to meet the demand for development out to 2065. The submitter fully supports that intent.

Plan Change 53 introduces a new Structure Plan for the Springvale area as shown below.

As originally proposed PC 53 was to include that area along the west side of Buxton Road including the submitters property. The submitter was fully in support of that proposal.

Subsequently the Buxton Road area was excluded from PC 53 for a number of reasons as referred to in the Section 32 report as follows:

- *Following consideration of the CIA and AA reports, PC53 has been modified to exclude the Buxton Road catchment identified as most likely to comprise archaeological sites Refer to Appendix Two of this report. (S32 report – page 7).*
- *In relation to section 6(h) of the RMA, the SSP report documents the natural and physical constraints of this area and reviewed the natural hazard risks to determine that flooding is a risk that can be avoided by careful infrastructure design to manage stormwater flows. Further research and consultation has determined also to exclude the Buxton Road catchment and retain the Rural Lifestyle Zone over such land as a method to further manage flood hazard risks (S32 report – pages 7/8).*
- *The boundary of the area affected by PC53 was reduced as a result of iwi and landowner engagement and consideration of the cultural, archaeological and ecological assessments detailed in Section 3.3 of this report (S32 report – page 16).*

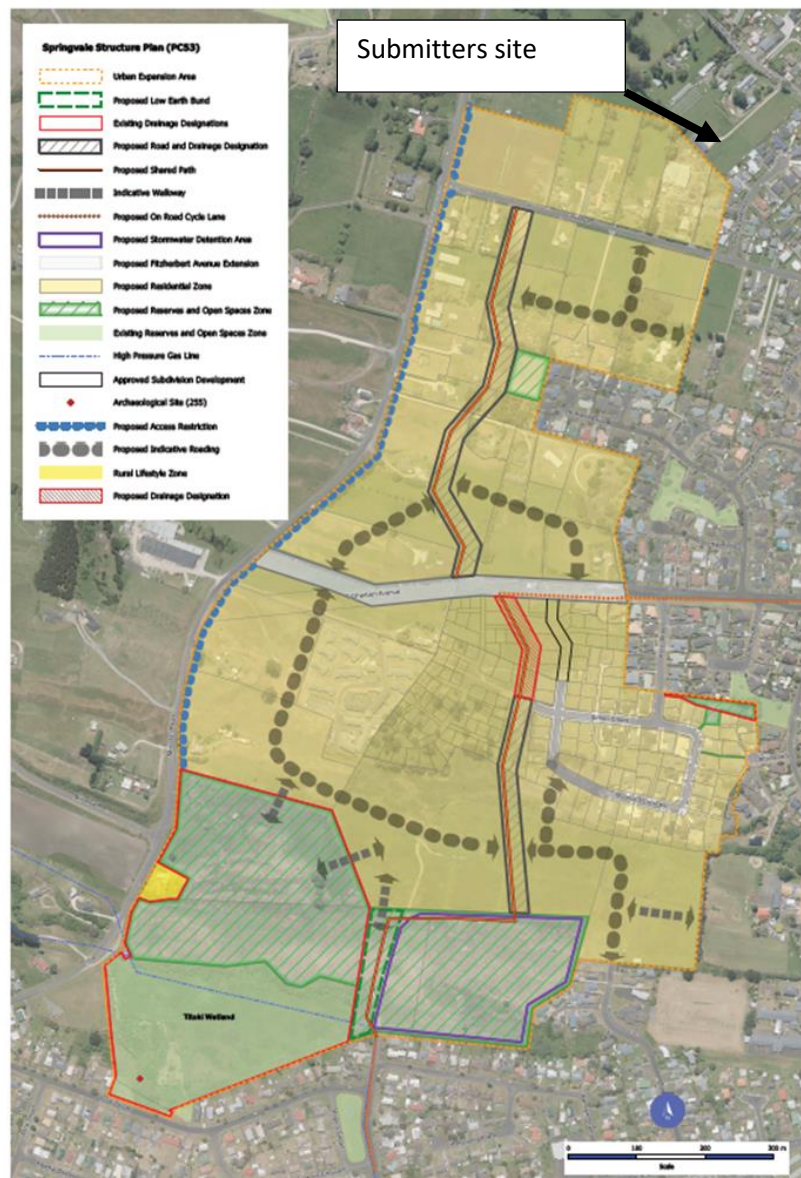


Figure 12. Springvale Structure Plan (PC53)

These considerations resulted in an Option C for the proposed plan change being the preferred option for Plan Change 53. It also recognized the potential uncertainty for landowners in Buxton Road (*S32 report – page 28*).

It is understood that other considerations leading to the removal of the Buxton Road area possibly included;

- The cost effectiveness of infrastructural extensions
- Consideration of the National Policy Statement on Urban Development Capacity 2016.
- The overall quantum of demand for residentially zoned land against the area that would become available.
- The passive nature of feedback received during the pre-notification consultation process.

These matters are addressed in Section 8 below.

## 7. Development Contributions Policy

Whilst not directly relevant to PC 53 it is noted that the Councils Development Contributions Policy includes the submitters property as being liable for development contributions if they are triggered under the policy.

The Development Contributions Policy does not extend to the whole of Councils area but targets two specific areas one of which is the Springvale Growth area (Figure 13). This area includes the submitters property.

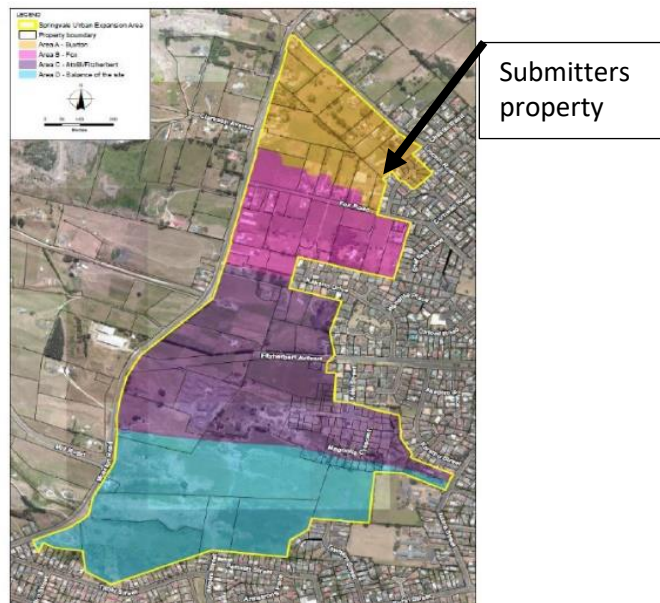


Figure 13. Springvale Development Contributions Area.

This submission does not oppose the Development Contributions Policy but notes that its configuration is not consistent with PC53.

It is however, relevant insofar as it provides for the development of the site and the provision of infrastructural capacity for that whole area over which it applies.

The adoption of a Development Contributions Policy sets up liability on developers to contribute to the upgrade of infrastructure and network capacity in undertaking any development. It correspondingly sets up a responsibility for the Council to ensure that the capacity is available. The submitter is reasonably entitled to consider that their site, being within a Development Contribution area, enables the development potential of the site to be considered on its merits (subject to resource consenting requirements) without being undermined by downstream network capacity concerns. If the Council has concerns over wider infrastructure capacity for the Buxton Road area it should modify its Development Contributions Policy simultaneously with the promulgation of PC53

There is not understood to be any intention on the part of the Council to amend the Development contributions Policy to align it with PC53.

The submitter understands and accepts that the development contributions will be required for any subdivision of the land. Currently they stand at \$13,896 (plus GST) per lot.

## 8. SUBMISSION

The submission is made in two parts.

- Matters raised by Council for the exclusion of the Buxton Road Area
- Matters in support of its inclusion.

### Matters raised by Council for the exclusion of the Buxton Road Area

#### Archaeological Matters.

*The Section 32 report for PC 53 notes that;*

*Following consideration of the CIA and AA reports, PC53 has been modified to exclude the Buxton Road catchment identified as most likely to comprise archaeological sites Refer to Appendix Two of this report.*

The S32 report refers to an Archaeological Assessment in its Section 3.3.2. being Appendix 5 of the report. Matters of relevance to this submission include:

- The report refers to the overriding authority that extends to all archaeological sites under the provisions of the “HPA 1993”. The Historic Places Act has since been repealed and replaced by the Heritage New Zealand Pouhere Taonga Act 2014. The report notes that none of the 420 records of sites in the Wanganui District have been recorded in the Study Area (Page 4).

- *The report finds that (page 9):*

*The background research and field inspections indicate that the Buxton and Fox Roads vicinity of Area 5 has the highest potential for both prehistoric and historic archaeological remains to be present. It is likely that historic archaeological remains related to the settlement of the area from the 1870’s are present.*

Comment. Whilst the submitters site and the surrounds have some potential for discovery of archaeological sites of value it is not considered that the evidence available is sufficient on balance to exclude the area from potential future development as:

1. There is overriding legislation that would extend protection to any sites of value that may be discovered in the development process.
2. The submission site is located so as to be a logical extension of the residential zone this being at the core of PC53. Its development would be subject to a resource consent application for subdivision and any such decision can be made subject to a condition that covers the discovery of any sites of interest. Such conditions are not unusual and usually include a discovery protocol that ensures the protection of such sites.

It is not reasonable to exclude the potential subdivision of the site in such a location on the urban fringe from normal residential development in the absence of any categorical information on its archaeological value. This is particularly so when there are tools available that may be applied to the site in the course of its development to protect any such sites. It is submitted that the wider benefits for the potential development of the site should carry greater weight



particularly given the protection that can, in any event, be extended to the site during the development process by way of conditions on a subdivision consent or event Consent Notices under Section 221 of the Resource Management Act.

#### Cultural Impacts Assessment (CIA).

The CIA is included in PC53 as Appendix 4.

It contends that (page 7);

*“... that this structure change would have a significant impact on the values of this area to tangata whenua.”*

And (page 22):

*The proposed area of development is designated by the Combined Hapū as a culturally significant zone, a - **Tongi Tawhito**.*

The submitter respects the CIA and its findings and submits that these aspects warrant full consideration during in the hearing and decision making process of the proposed Plan Change.

It is not the intention of this submission to engage in the wider nature of the matters raised in the CIA in relation to the Plan Change area. It is however appropriate to consider it from the applicants site perspective.

The CIA identifies a series of “no zones” for development within the Springvale Structure Plan 2018 area (page 32).

These areas extend over the full length of the proposed structure plan and, if adopted in the decision, would have a significant effect on the viability and practicality of PC53 as a whole.

The northernmost of these areas extends over the Buxton Road area as depicted below and includes the submitters property.

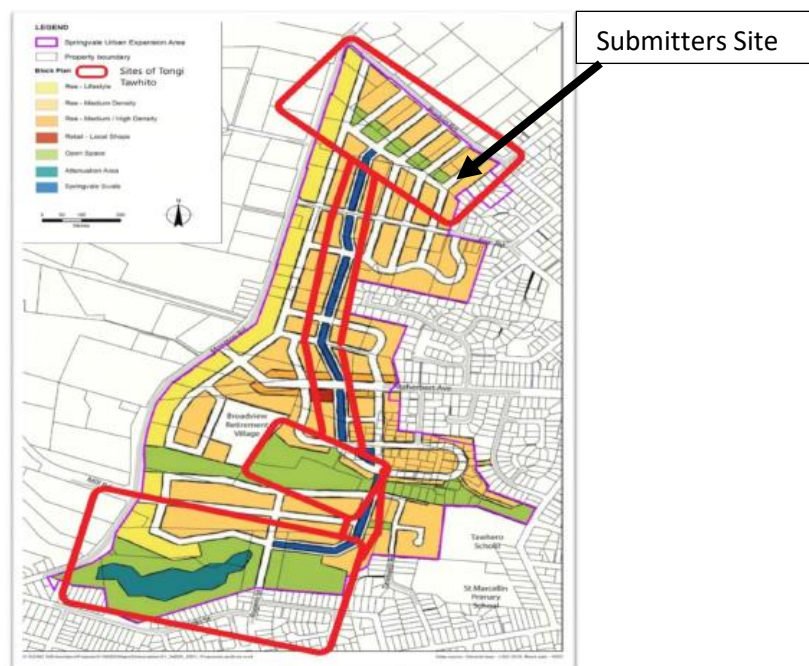


Figure 14. Tongi Tawhito Areas (Cultural Impact Assessment)

In relation to the Buxton Road area the CIA notes:

### 13.4 Karaka Trees

Karaka trees were valued by Hapū tūpuna for their berries and for attracting birds which they snared. Hapū narratives say that the karaka seed was brought to Aotearoa by Turi and his family on the Aotea waka. It is thought that the seed was obtained whilst Aotea was visiting Rangitahua(-hua) - Sunday Island – the Kermedecs. The seeds were intentionally planted by the Hapū as a food source and sign of occupation. Turi's wife Rongorongo had a famous 'tatau' - belt pouch - where the seed and other special items were held<sup>14</sup>.

Karaka trees are situated in the northern spaces (the vicinity of Buxton and Fox roads) of the Springvale study area. Karaka were often planted near prehistoric settlements, and elsewhere as a source of food for Māori. Their presence is often associated with Māori archaeological sites<sup>15</sup>.

It further recommends that:

#### 13.4.1 Recommendation

**The Combined Hapū oppose the proposed plan change because of the adverse cultural and environmental effects it will create on the current stand of Tī and Karaka.** These tāonga species are of great cultural significance and must be retained and protected. It is the view of the Combined Hapū that these areas are not to be developed and the re-establishment of the original area be a priority. The planned development would preclude the extension a regenerated ngāhere and could impact on the current stand. Any impacts on the current trees or an encroachment of urban development as a result of the proposed plan change would preclude the establishment of an 'Ara' or a biodiversity corridor to ensure tāonga species are supported and are flourishing giving effect to Hapū kaitiakitanga.

It is submitted that it is not appropriate on the basis of the above to exclude the Buxton Road area from the Plan Change area whilst at the same time leaving in those other above "no zones" for consideration in the Plan Change hearing, decision and appeal processes. The CIA has provided a thorough assessment of the Structure Plan 2018 area as a whole as well as on a more site specific basis and it is appropriate that that report be considered on a wholistic basis and without particular areas being included or excluded from consideration in the decision making process. That would preclude the desirability of a comprehensive consideration of the CIA in the decision making process.

The CIA also considers the possibility that PC53 may proceed as notified in spite of the Combined Hapu opposition and suggests that, in that event, that accidental discovery protocols should be adopted in the development of these areas (refer Section 16.2 of the CIA). This would add a specific layer of protection that is not available at present to the submitters site in respect of any discovery.

The use of accidental discovery protocols within the resource consenting process is common practice and the applicant supports their adoption in this case. This would allow development to take place in a precautionary way without prejudice to the wider needs of the community and the Combined Hapu.

Flood Risk

The Section 32 report (page 7) notes in relation to flood risk that:

*In relation to section 6(h) of the RMA, the SSP report documents the natural and physical constraints of this area and reviewed the natural hazard risks to determine that flooding is a risk that can be avoided by careful infrastructure design to manage stormwater flows. Further research and consultation has determined also to exclude the Buxton Road catchment and retain the Rural Lifestyle Zone over such land as a method to further manage flood hazard risks (S32 report – pages 7/8).*

The details of the above are not clear from within the Section 32 report or its appendices. The submitter however notes the following assuming the above relates to the drainage channel along the southwest boundary of the submission site.

The channel drains to down to the east into the adjoining residential areas and is managed by the Council. The development of the submission site will not exacerbate any floodwater risk in the management of this system noting that the submitter has included a flood mitigation area within the draft subdivision for that purpose.

It is submitted that any flood risk that may arise from the residential subdivisions and use of the site can be mitigated by way of conditions on the subdivision consent. It has not been shown in the documents that the flood risk is sufficient to preclude the development of the site particularly given its location on the urban boundary and its direct alignment with the purpose of Plan Change 53.

The cost effectiveness of infrastructural extensions

The submitter meet with staff of Whanganui District Council on 9 July 2019 to discuss the infrastructural implications of the proposed subdivision of the site. There were no issues raised in relation to on-site servicing that would preclude the development of the site although concerns over downstream network capacity were raised. These matters will require consideration for the Structure Plan area as a whole and the submitter is not aware of any specific reason to exclude the submission site from the Plan Change on these grounds (noting also the Development Contributions Policy comments in Section 8 above).

Consideration of the National Policy Statement on Urban Development Capacity 2016.

Whilst the assessment of the NPS in the Section 32 analysis relates to that area within the Plan Change area only it is clear from a review of the Objectives and Policies in the NPS that the development of the site would be consistent with them. There are no grounds to exclude the submission site from the Plan Change area under the NPS particularly when considered in the context of its location on the urban boundary and the proximity of available services.

The overall quantum of demand for residentially zoned land against the area that would become available is a consideration in the NPS. Typically land available for development extends from the boundary of the existing residential area and where the services are available. The submission site meets both these criteria and logically lends itself to being available for development at the earliest stage. This is entirely consistent with the submitter's intentions.



### Pre-notification Consultation

It is understood that one of the reasons for the exclusion of the submitter's property and the Buxton Road area was the generally passive response of persons in the Buxton Road area. The S32 report notes that;

- *The boundary of the area affected by PC53 was reduced as a result of iwi and landowner engagement and consideration of the cultural, archaeological and ecological assessments detailed in Section 3.3 of this report (S32 report – page 16).*

The applicant has in the course of preparing this submission undertaken consultation with property owners adjoining the submission site and has receiving written confirmation of support from the following properties (Appendix 1);

- 107 Lincoln Road
- 1 Buxton Road
- 98 Fox Road
- 92 Fox Road

These persons will in the course of the further submissions process have further opportunity to confirm or otherwise their views.

### **Matters in support of the inclusion of the Buxton Road Area.**

#### The Historical Perspective

The Council has over the years created an expectation that the submission site and surrounds were part of the Councils vision for the growth of the area. This is reflected in Springvale Structure Plan (which already forms part of the District Plan) and the Councils Development Contributions Policy. It was also reinforced at meetings with staff who were very positive towards the development of the site.

Notwithstanding the above Plan Change 53 has now excluded the Buxton Road area. The 'dezoning' of the submission site and surrounds by PC53 undermines public confidence in Councils planning documentation (as in the submitters case). It also creates a discord between the Development Contributions Policy, which includes the area, and PC 53 which doesn't.

It is accepted that planning for the future is not a certain science but the logic of excluding a previously included area on the boundary of the residential zone for future growth does not follow when set against the obvious positive benefits to both the submitter and the wider community as set out in this submission.

#### Managing the direction of development.

The exclusion of the Buxton Road area sets up something of an anomaly in the growth pattern of the area. It will result in an area of Rural Residential land, being the submitters property, surrounded on three sides by residential type development or the potential for that development. The area to the east is already zoned and developed as residential land, the land to the northeast is developed essentially as residential and the land to the southwest is to be rezoned residential under PC53. It is logical that that submitters property be brought into line with that pattern of development along with the properties to the northeast noting that this would also be consistent with the Councils Strategy on pages 12/13 of the S32 report.

This is desirable not only from an efficient urban design perspective but also from the perspective of infrastructure and services.

It is submitted that this would also be consistent with the National Policy Statement on Urban Development Capacity 2016.

Site Potential and Constraints.

As shown the site is suitable for subdivision into at least ten residential lots in a manner consistent with the residential zoning that would apply under PC53. It is flat, enjoys good access with extensive traffic sightlines and has access to services at or near the site boundary.

In the normal course of any resource consent application for subdivision it would be necessary to assess the potential adverse environmental effects of a proposed subdivision and these should be allowed to be considered on their merits under a Residential zoning. Potential adverse effects can be remedied, mitigated or avoided as appropriate and it is entirely normal that conditions would be applied in relation to;

- Geotechnical requirements
- Potential hazards (flooding)
- Infrastructural requirements
- Archeological discovery

Development Contributions would also be required in the normal course of events.

Compatibility with the Proposed Structure Plan.

The submitter is conscious of the Councils desire, as expressed in the Proposed Structure Plan for connectivity through the Structure Plan area and into the wider area.

The submitters site has direct access to Lincoln Road and its connectivity into Whanganui. It is also accepted that this is best supplemented by the incorporation of that potential into the Structure Plan.

This is proposed to be achieved by the extension of the Structure Plan over the site in the manner shown below. This would open up not only the connectivity to the Structure Plan area but also the future extension of the Structure Plan area to the north into the Buxton Road area. It would also open up Lincoln Road for improved access to the City alleviating the traffic burden on Fox Road.



#### Plan Change 53. Objectives, Policies and Rules.

For the avoidance of doubt the submission does not seek to change any of the Objectives, Policies and Rules of PC53. It simply seeks to be captured into the Plan Change area as a proposed Residential Medium Density zone.

**9. Conclusion and Recommendation.**

It is submitted that the submission site is appropriate for and should be included into Plan Change 53 under its Residential zone provisions as was originally anticipated.

It is further submitted that it would be appropriate to consider the inclusion of those areas to the northwest and northeast of the site into Plan Change 53 (although the submitter makes no representation on behalf of the owners of those properties).

The submission site is suitably located and configured (shape, gradient, etc.) for subdivision and development under the zoning provisions of Plan Change 53. This would be consistent with the historical intentions of the Council and adjoining residential areas. Subdivision consent conditions in the normal course of events are anticipated and any site constraints are not likely to be sufficient to preclude the site from being included in the Plan Change area.

**12 July 2019**

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**Appendix 1: Consultation Returns**

(NB: the first page has not been replicated below for each submission. It is available on request)



Tony Thomas Consulting

1197 Queen Street East, RD 1, Levin 5571 | 021 063 5535 / (06) 3684149 |

2 July 2019

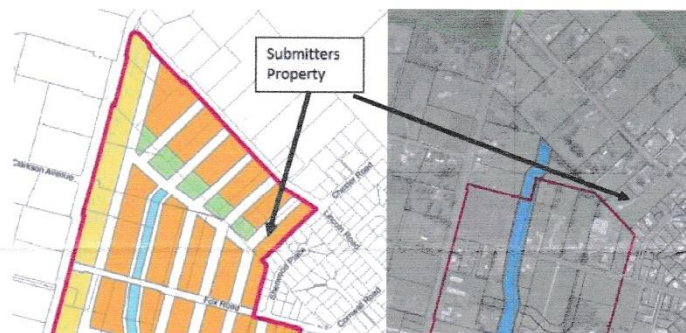
**SUBMISSION ON PROPOSED PLAN CHANGE 53  
DAVID AND JACQUE FLINTOFF OF 105 LINCOLN ROAD.**

Whanganui District Council has recently publicly notified their Proposed Plan Change 53 which relates to the Springvale Structure Plan growth area. Submissions close on 12 July 2019.

This letter seeks your support for our submission as outlined below. If you are willing to confirm that support we would very much appreciate it if you could confirm it either by way of filling out the details at the end of this letter or any alternative format you may prefer.

The proposed change to the District Plan intends (amongst other things) to extend the medium density residential zone of Whanganui to the Springvale area so provide the capacity for future growth.

In previous draft versions of the proposal our property at 105 Lincoln Road was included in the proposed rezoning along with other properties on the southwest side of Buxton Road. In the final version of the proposal, as publicly notified, these properties have been left out. Our submission simply seeks to have our property included back onto the proposed rezoning as was originally intended. See plans below.



Previous Structure Plan

Proposed Structure Plan

In essence our submission will say that if the Council is looking to provide for residential growth then it is logical that it should be considered along the outer boundary of the residential zone such as in our case. There are services and roads available and our property is already bounded on two sides by residential type developments (even though area along the northwest side of Chester Road is zoned Rural Lifestyle).

A copy of the details of the proposed plan change is available on the Councils website.

We would really appreciate your confirmation of support for our submission as soon as possible. If you would like to discuss this please feel free to call me, David, on 027 263 1893 or Tony Thomas, on 021 063 5535.

Yours sincerely

 Dave Flintoff

David and Jacque Flintoff.

This is to confirm that (name/s)

Leff & Maureen Jurgens

as the owners of the property located at

107 Lincoln Rd  
Springvale Wanganui

support the incorporation of the property at 105 Lincoln Road into Proposed Plan Change 53.

 Signed

5-7-2019  
Date

We would really appreciate your confirmation of support for our submission as soon as possible. If you would like to discuss this please feel free to call me, David, on 027 263 1893 or Tony Thomas, on 021 063 5535.

Yours sincerely

 Dave Flintoff

David and Jacque Flintoff.

This is to confirm that (name/s)

D.C & M.D. MITCHELL TRUST

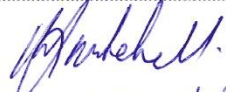
as the owners of the property located at

1 BUXTON ROAD  
WANGANUI

support the incorporation of the property at 105 Lincoln Road into Proposed Plan Change 53.

M.D. Mitchell TRUSTEE  
Signed

11.4.19.  
Date

  
11.4.19. Mitchell.  
Trustee.

We would really appreciate your confirmation of support for our submission as soon as possible. If you would like to discuss this please feel free to call me, David, on 027 263 1893 or Tony Thomas, on 021 063 5535.

Yours sincerely

 Dave Flintoff

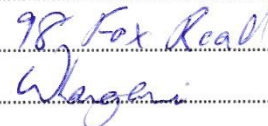
David and Jacque Flintoff.

---

This is to confirm that (name/s)



as the owners of the property located at



support the incorporation of the property at 105 Lincoln Road into Proposed Plan Change 53.

  
Signed

  
Date



We would really appreciate your confirmation of support for our submission as soon as possible. If you would like to discuss this please feel free to call me, David, on 027 263 1893 or Tony Thomas, on 021 063 5535.

Yours sincerely

 Dave Flintoff

David and Jacque Flintoff.


This is to confirm that (name/s)

DAVID DAVIDSON

as the owners of the property located at

92 Fox RD  
Wairarapa

support the incorporation of the property at 105 Lincoln Road into Proposed Plan Change 53.

  
Signed

3.7.2019  
Date



# WHANGANUI DISTRICT COUNCIL

Te Kaunihera a Rohe o Whanganui



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

Resource Management Act 1991 In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

TO: Whanganui District Council, PO Box 637, Whanganui

Name: (print in full) MARION JOAN RAINFORTH

This is a submission on Plan Change No. 53 to the Whanganui District Plan.

Closing Date: 12.7.2019 SPRINGVALE SUBDIVISION

1. (a) I ~~could~~ / **could not** gain an advantage in trade competition through this submission.  
 (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.

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

I support the change from rural to residential zoning.  
I support the development of a "swale" as indicated.  
I would like to see a cycle/walkway included in this area to reduce congestion on Mosston Rd.  
 (Use additional pages if required) and provide a safer passage for school children.

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):

I am particularly concerned about traffic patterns by Mosston School. Would it be possible to develop an underpass to the school so that Springvale children do not have to cross that busy road? (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):

.....  
 ..... (Use additional pages if required)

5. I ~~do~~/do not wish to be heard in support of this submission.
6. If others make a similar submission I **would** /~~would not~~ be prepared to consider presenting a joint case with them at any hearing.

7. Address for service:

61 B KOROMIKO RD  
WHANGANUI

Signature: Mr Bainforth

(Person making submission or person authorised to sign on behalf of person making submission)

Day time phone No: 06 345 7125

Email: .....

Date: 12.7.2019

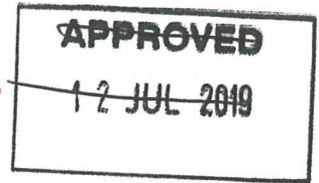
I appreciate that time has been taken for consultation with local Iwi and preservation of fishing & bird habitats and archaeological sites considered.





# WHANGANUI DISTRICT COUNCIL

Te Kaunihera a Rohe o Whanganui



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

Resource Management Act 1991 In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

TO: Whanganui District Council, PO Box 637, Whanganui



Name: (print in full) Robert Craig and Linda Eve O'Keeffe

This is a submission on Plan Change No. 53 to the Whanganui District Plan.

Closing Date: 12/7/19

1. (a) ~~I could~~ / **could not** gain an advantage in trade competition through this submission.  
 (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.

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

see attached form pages 3 & 4

(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):

See attached form and map pages 3, 4 & 5

(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):

See attached form and map pages 3, 4, 5 & 6

(Use additional pages if required)

5. I ~~do/do not~~ wish to be heard in support of this submission.
6. If others make a similar submission I **would** /~~would not~~ be prepared to consider presenting a joint case with them at any hearing.

7. Address for service:

130 Mosston Road  
Whanganui

Signature: 



(Person making submission or person authorised to sign on behalf of person making submission)

Day time phone No: 344 5040 0274 332626 Rob  
0274 733767 Linda

Email: okjoiner@extra.co.nz

Date: 11/7/2019

This is a submission on Plan Change 53 to the Whanganui District Plan

Robert and Linda O'Keeffe, 130 Mosston Road, Whanganui

1a. **We do not** gain an advantage in trade competition.

1b. **We are** directly affected by an effect of the subject matter of the submission.

2. **The specific provisions of the proposed plan change that our submission relates to are:** The rezoning and designation of land within the Springvale Structure Plan Change area, restricting access to Mosston Road, the need for new drain/road/shared pathway.

3. **Submissions: The following submissions relate to the attached plan (PC53).**

**Rezoning of Structure Plan area to Residential. Opposed.** Our submission is that we have a unique property and have spent 30 years developing it into a lifestyle block, therefore, have no reason for the property zoning to be changed to residential. The proposed change is for the benefit of others.

**Rezoning of land to Reserves and Open Spaces: Support.** We encourage the inclusion of reserves and open spaces in the District Plan as it benefits the community and environment.

**Minimizing Access to Mosston Road: Opposed.** Our submission is that we oppose the restriction of access for new dwellings to Mosston Road. If the proposed Structure Plan is adopted we will have to make life changing decisions which would be made more difficult by having restrictions imposed on our property. There will be an increase of traffic on Mosston Road in the future, whether there is additional residential properties or not, so our proposal is to improve the existing road and providing a shared pathway along it. The safety of Mosston School children travelling along and crossing Mosston Road should be taken into account with the provision of a crossing or underpass near the school.

**Proposed drainage, road and shared pathway designation: Opposed.** Our submission is that the Structure Plan requires a 30M strip of land which would bisect our property and cause a huge, negative impact on us. The Eastern part of our property would be impractical to manage, while the proposed drainage, road and pathway would come close to our home, destroy our sewerage system, cut our water supply, cause noise and light pollution and cause us distress. There has been no flood modeling done by Horizons (as of Oct 2018) and, as far as we know, there has been no on-site topographical studies at individual properties to determine if there will ever be a need for a drain or swale.

**The Springvale Structure Plan and associated documents: Opposed.** Our submission is that the Springvale Structure Plan and related documents are hard to understand, at times they

have not been accurate, are not referenced so they can be recognised as current, they contain information that is hard for us to understand, that we have been told that we need to raise all points of concern at this submission stage as we would not be able to address them in the future communications and there has not been any formal notification of a time frame, therefore we are disadvantaged by the process.

**In summary we oppose** the Springvale Structure Plan Change No.53 because we do not know what the outcomes will be, what time frame is expected and therefore what the effects on our property and lifestyle would be.

**4. We seek the following decision from Council:** Firstly, we want the Council to research the proposed road, drainage designated area in a more diligent manner before accepting the plan. We believe that by looking at the specific geographical features of each affected property the Council will see that this proposal will not work as expected.

Secondly, we want to know if the Council is definitely going to do something in relation to the Structure Plan Change No 53 and the time frame for it. This has been going on for 20 years and we are now at a stage that we need to know what is going to happen to our property and when it will happen.

We would like the Plan to be amended to have underground drainage only (no road or shared pathway) from Fox Road to a cul de sac at 124 Mosston Road. This will allow us to retain our property (and lifestyle) and any development to the South of 130 Mosston Road would utilise the drain/new road. We understand that there are plans already existing for development for some of this area.

We would like the Structure Plan amended to include a shared pathway along Mosston Road from Springvale Road to the Titoki Wetland, including provision for safe road crossing near Mosston School and near the Wetland area. We would like the proposed On Road Cycle Lane on Fitzherbert Avenue to continue West to Mosston Road as an Off Road Shared Pathway.

**5. We wish** to be heard in support of this submission.

**6. If others make a similar submission we would** be prepared to consider presenting a joint case with them at any hearing.

**7. Springvale Structure Plan (PC53) map** which we believe to be the current and final proposal.

Signed



Rob O'Keeffe

11/07/2019



Linda O'Keeffe

11/07/2019

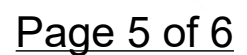
Email [okjoiner@xtra.co.nz](mailto:okjoiner@xtra.co.nz)

Rob 0274 332 626

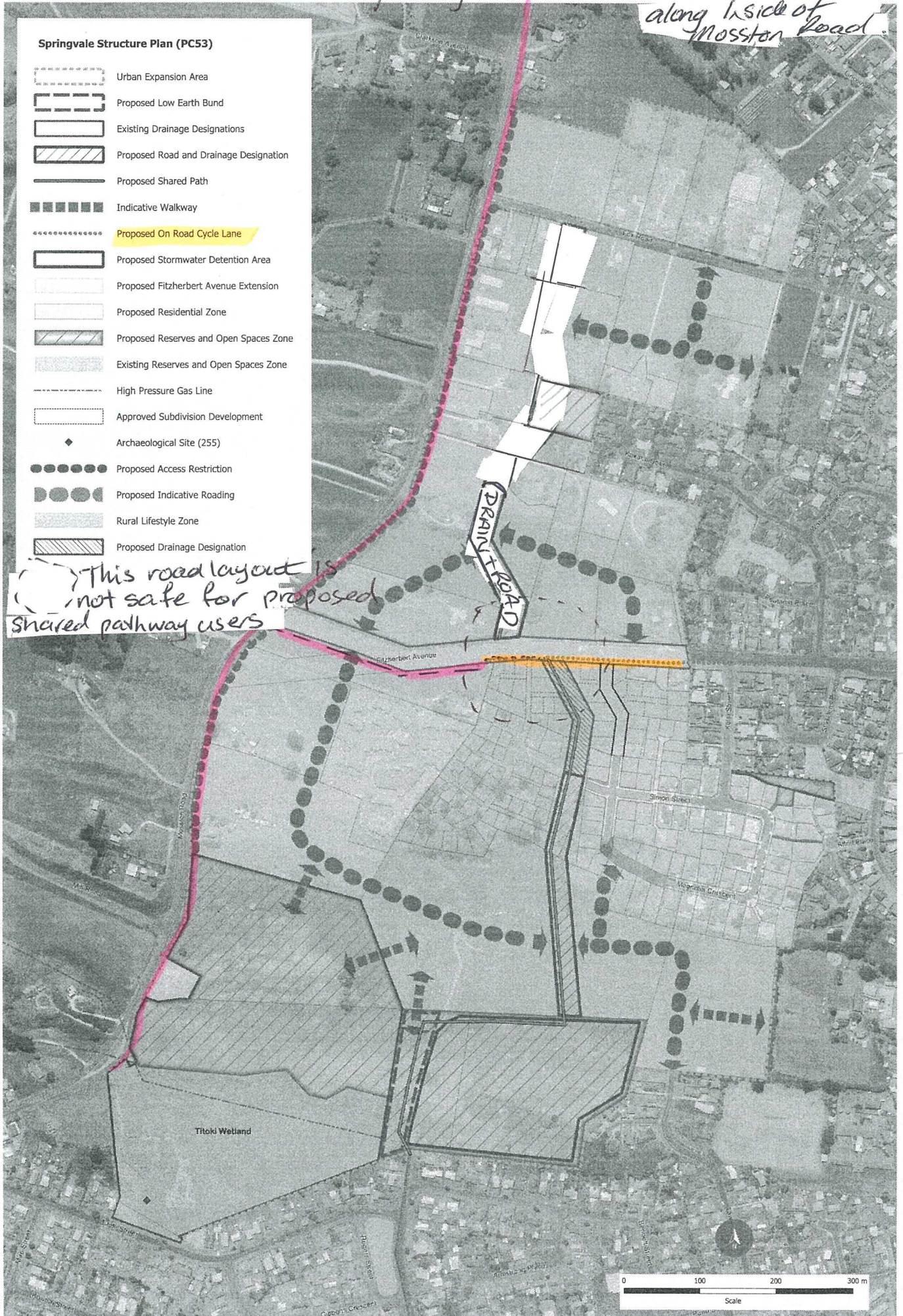
Linda 0274 733 767

or daytime 344 5040













12 July 2019

Brenda O'Shaughnessy  
Whanganui District Council

Email: Brenda.O'Shaughnessy@whanganui.govt.nz

Tēnā koe Brenda,

**RE: Plan Change 53 - Springvale Structure Plan**

This letter is a submission on the draft Plan Change 53 - Springvale Structure Plan.

The Springvale Whenua Development Combined Hapū submitted the Cultural Values, Cultural Impact Assessment (CIA) for this proposed plan change in December 2018. This document is attached as Appendix 3 on the Whanganui District Council submission's website. Since this document has been submitted Council at this stage have not given any indication of their commitment to implementing recommendations outlined within the CIA.

The Springvale Whenua Development Combined Hapū is concerned that no communication and guidance has come from Council in terms of how the CIA is going to be implemented in the draft plan change.

The Springvale Whenua Development Combined Hapū assert that until Council display how the recommendations of the CIA assessment have been meaningfully implemented to guide the draft plan change and how any subsequent developments within the Springvale Area will be informed by cultural principles, we will continue to oppose this draft plan change 53, in its entirety.

Our opposition is out of concern for the adverse cultural and environmental effects outlined in the CIA which have remained inadequately addressed by Council throughout the plan change 53 process. Of particular concern is;

- the lack of clarity around protection of water quality in Titoki Wetland from storm and waste water discharge so that it remains a site for the safe gathering of mahinga kai,
- lack of recognition of the relationship of Māori to whenua beyond sites of significance,
- intention of council to ensure appropriate tikanga is followed prior and during earthworks and land disturbances, including, but not limited to, the need for koi iwi to remain in-situ in certain circumstances and
- the commitment to ensuring that place and street names are used which acknowledge the Combined Hapū mana whenua over the area.

In addition, the Springvale Whenua Development Combined Hapū welcome deeper engagement with the Council to assist in the meaningful implementation of the recommendations of this report and to further discuss any measures to avoid, remedy and mitigate any further cultural impacts of the Springvale Structure Plan Change and pre-development.

We would wish to be heard in support of submission.

Noho ora mai



Mike Neho  
**Ngaa Rauru ki Tahī**  
**Tumuwhakarae**



John Maihi  
**Te Ruunanga o Tuupoho**  
**Kaiwhakahaere**