DISTRICT PLAN REVIEW - OTAMATEA WEST STRUCTURE PLAN AND PROPOSED REZONE

24 August 2017

Regarding the above mentioned plan, which I have discussed in person with members of the planning staff, but would now like to express in a written submission, my surprise that the long held designated road coming off the Great North Road on to my property at 181 Great North Road has been shifted south to my neighbour's property. Even though this does not prevent development of my property, the practicality of making this change is questionable.

When we took up residence years ago on our property at 181 Great North Road, Council informed us that the 16 metre wide strip that runs through it was reserved for a road and told us that we were not allowed to build on it. Around the year 2015 when I decided to sell the land into which the road strip leads, I checked with Council to make sure it was still a designated road. Dave Wan was the senior policy planner at the time and he provided me with a plan which actually depicted a road running through the 16 metre wide strip.

So, as I say, it came as quite a surprise to see that the "goal posts" have been shifted in the new plan.

The practicality of this shift is questionable because Sharon Underwood's School of Dancing studio is in the way of the proposed road and would have to be demolished. It does seem strange that we have not been allowed to build any buildings on the 16 metre wide road strip that runs through our property, yet there is a building in the way of the proposed road on the new plan!

In discussion over this issue with the planning staff, the Dancing Studio was referred to dismissively as being "just a shed." It is actually a fairly modern structure 1,200 square metres in size with aluminium joinery and would cost well in excess of $100,000 to build. It actually has the potential to be converted into a granny flat.

Mr and Mrs Underwood are not in favour of the road going through their property for obvious reasons and, like myself, cannot understand why it has been shifted from its original position, where no buildings were in the way, and from which access can easily be provided to Underwoods and Lillingtons properties if required.

The fact of the matter is that Underwoods do not want their property developed and will not agree to a road running through it. On the other hand, I do want my property to be developed and am agreeable to a road running through it. I am actually anticipating the sale of my property in the foreseeable future. In the event of this happening, the developer will put the road through the original 16 metre wide strip which will make the other road superfluous, in which case it would make more sense to leave it in its original position on the new plan.

Finally, I would like to point out that the newly proposed site of the road comes out on a hill, the highest point on my property and is the prime position for a house affording the best view. The original position of the road goes around the base of the hill which is far more desirable from a developers point of view.

Yours faithfully,

B. Hodson

Barry Hodson.

RECEIVED
30 AUG 2017
WDC Records

G C and S E Underwood
175 Great North Road
Wanganui

Ph/fax 06 3453211

Postal Address
P.O.Box 4263
Wanganui

Email jazzworld@xtra.co.nz

26 Aug 17

Whanganui District Council

Attention Rachael Pull and Brenda O'Shaughnessy

Thank you for your advice regarding proposed changes to the Otamatea West Structure Plan.

We would like it noted that we are adamantly opposed to having a road situated down the southerly side of our block of land. We have enjoyed living at 175 Great North Rd since 1988 and since that time have made significant changes to the property. The proposed road would pass through the studio/games room and slice a piece off our recently built new garage.

The 16 meter strip on our northern side on Barry Hodson's land has always been designated as the access to the rear of Hodson's property. This strip does not impinge on any buildings and therefor has our support for development.

Yours sincerely

Sharyn and Geoff Underwood

Graham and Jane Lillington
173 Great North Road
Otamatea
Wanganui 4501

Tel: 021 748 418

E: jgdotto@gmail.com

2 September 2017

Otamatea West Structure Plan

For the attention of Mr Kim Fell
cc : Rachael Pull and Brenda Shaughnessy

My wife and I strongly object to the process and suggested plan as indicated.

The plan indicates a possible future road situated along and within the boundary of our property 173 Great North Road and that of our neighbours, the Underwoods at 175 Great North Road.

At no time has anybody consulted with us or our neighbours about this. If they had it would be known that we would never permit this option.

There is already a designated 16 meter wide access strip to the north of 175 Great North Road which has been in place for over fifty years. This would have no impact on our property and is by far the best option for access to the rear of Hodson's property.

Of immediate concern is that we are in the process of selling part of our property and it has come to our notice that staff at council are actively advising prospective buyers that this road is in the plan and that it will directly affect any development on our property.

This will not be tolerated and we demand an immediate written statement to the effect that there will be no road built between the two properties in question without the express permission of all title holders.

The fact that this has happened at all has seriously jeopardised the prospects of a successful sale of our property, and we are sure you would agree that an early resolve on this is in the best interest of all concerned.

We expect a written confirmation by the close of business on Monday 4 September.

Yours sincerely

Graham & Jane Lillington

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

PC 46 Submission: 004

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* GEOFFREY HAMILTON THOMPSON

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:** 6 OCT 2017

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

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

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

THAT A NEW ROAD GOES THROUGH THE FRONT OF MY PROPERTY AT 193A GREAT NORTH ROAD, WHANGANUI.

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)*:

I OPPOSE THE PROPOSED ROAD AS IT WOULD LIE ON TOP OF 2 DUCK PONDS AND A DRAIN THAT FILLS WITH WATER WHEN IT RAINS. IT ALSO OFFERS NO ADDITIONAL BUILDING AREAS THAT COULD NOT BE ACCESSED FROM THE EXISTING ROADS.

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)*:

THAT THE PROPOSED ROAD GOING THROUGH THE FRONT OF 193A GREAT NORTH RD BE DELETED FROM THE PLAN

THE GROUND IS UNSUITABLE TO SUPPORT A NEW ROAD AND THE EXISITING ROADING IS ADEQUATE.

Use additional pages if required

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

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

7. Address for service:

193A GREAT NORTH ROAD
WHANGANUI

Signature:

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

Day time phone No: 06 348 7643

Email: ..... **Date:** PC 46 Submission: 004

D-246215

Email: WINNIEWITCH@WINDOWS LIVE.COM Date: 2 OCTOBER 2017

D-246215

Submission on a Publicly Notified Plan Change To The Whanganui District Plan

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

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* Powerco Limited (c/- Gemma Kean, GHD)

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:** 06/10/17

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

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

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

   See attached submission document.

   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 submission document.

   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 submission document.

   Use additional pages if required

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

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

7. **Address for service:**

   GHD Limited
   PO Box 13-468
   Christchurch 8141
   Attention: Gemma Kean

   Signature: (on behalf of Powerco Ltd)

   (Person making submission or person authorised to sign

SUBMISSION BY POWERCO LIMITED ON THE WHANGANUI DISTRICT PLAN CHANGE 46- OTAMATEA WEST

To:
Whanganui District Council
PO Box 637
101 Guyton Street
Whanganui
Email: Leayne.Huirua@whanganui.govt.nz

From: Powerco Limited ("Powerco")
Private Bag 2061
New Plymouth
(Note that this is not the address for service.)

Feedback closes Friday 06/10/2017

1. This is a submission by Powerco Limited on the Whanganui District Council Plan Change 46- Otamatea West.

2. The reasons for Powerco's submission are set out in the attached schedule (Schedule 1). In summary, this submission seeks to ensure that the council is aware of our assets, and enables the construction of additional electricity distribution infrastructure when allowing new residential development in Otamatea West.

3. Powerco **does not wish to be heard** in support of this submission.

Dated at New Plymouth this 4th day of October 2017

Signature of person authorised to sign on behalf of Powerco Limited:

Gemma Kean

ADDRESS FOR SERVICE: **GHD Limited**
PO Box 13-468
Christchurch 8141
Attention: Gemma Kean
Phone: 64 03 378 0926
Email: gemma.kean@ghd.com

Schedule 1 – Submission by Powerco

SCHEDULE 1
REASON FOR POWERCO'S SUBMISSION

1. INTRODUCTION

1.1 This submission has been prepared on behalf of Powerco Limited (**Powerco**). Powerco is New Zealand's largest electricity and second largest gas distributor in terms of network length, and has been involved in energy distribution in New Zealand for more than a century. The Powerco network spreads across the upper and lower central North Island servicing over 400,000 consumers. This represents 46% of the gas connections and 16% of the electricity connections in New Zealand.

1.2 Powerco's electricity networks are located in five regions – Taranaki, Manawatu-Whanganui, and Greater Wellington (Wairarapa only), as well as parts of the Bay of Plenty and Waikato. Powerco distributes electricity to residential and commercial customers throughout the Whanganui District.

1.3 Powerco has electricity assets within the Whanganui area, including poles, transformers, high and low voltage above ground lines, underground cables and transformers. There are no gas assets in the area subject to this plan change.

2. POWERCO'S SUBMISSION

2.1 Powerco has a neutral position to the Whanganui District Plan Change 46- Otamatea West, but seeks to ensure that suitable provision is made so that Powerco can construct additional electricity distribution infrastructure for future residential development in the Otamatea West area. Table 1 of this submission sets out specific changes requested by Powerco to the plan change text and provides additional detail on some of the points made below.

2.2 For new development, and areas projected for future residential growth, it is important that the provision of new electricity distribution infrastructure is enabled. It is necessary for infrastructure providers, including Powerco, to have sufficient warning of planned new development so that appropriate planning can be carried out for new infrastructure, and so that any new infrastructure can be constructed in conjunction with new residential development to reduce the effects of disrupting other infrastructure e.g. roads and water networks.

2.3 Currently, electricity reticulation in the Otamatea West area is supplied via an 11kV cable from Tirimoana Place and through overhead lines on State Highway 3. Powerco have advised that new power reticulation in this area would be designed and built as each stage is developed. However, the Otamatea West Structure Plan does not include any provision for electricity distribution infrastructure.

2.4 Powerco supports the development of additional electricity distribution infrastructure in a logical sequence as development progresses (proposed Policy 13.3.35 e.). Powerco

supports proposed Policy 13.3.8 as the electricity distribution infrastructure required for the Otamatea West Structure Plan area will need to be supplied from an existing 11kV cable in Tirimoana Place, and the overhead lines on Great North Road. Electricity distribution infrastructure also needs to be constructed prior to residential development occurring and appropriate to the scale of development proposed.

2.5 The objectives and policies of the National Policy Statement on Urban Development Capacity 2016 relate to 'energy' and 'other infrastructure' which is not directly controlled by a local authority. The following objective and policies are relevant to this plan change:

Objective OD1: '*Urban environments where land use, development, development infrastructure and other infrastructure are integrated with each other*,' and

Policy PA2: '*Local authorities shall satisfy themselves that other infrastructure required to support urban development are likely to be available'* and

Policy PA3: '*When making planning decisions that affect the way and the rate at which development capacity is provided, decision-makers shall provide for the social, economic, cultural and environmental wellbeing of people and communities and future generations, whilst having particular regard to:*

b) Promoting the efficient use of urban land and development infrastructure and other infrastructure'

Plan Change 46 and the development of the Otamatea West Structure Plan provide for future development and growth in the area. To enable development of the necessary electricity distribution network to service future residential development in the Otamatea West Structure Plan area, the Structure Plan needs to facilitate the development of other infrastructure services and not only Council operated services. In its current form, Council owned water services and roading services have been provided for in the plan change, however, in order to give effect to the National Policy Statement on Urban Development Capacity, the structure plan provisions need to ensure the planning and installation of development infrastructure and other infrastructure (including the electricity distribution network) will be undertaken in an integrated and coordinated manner.

2.6 All references to the Otamatea West Structure Plan in the Plan change text should be clarified to make specific reference to the external document (prepared by Opus International Consultants Limited 2017) and the correct figures where required. The Section 32 document identifies that Figure 12 will be included as Appendix L but this has not been incorporated into the Plan Change documents. It is unclear what specific document and the diagrams within it are being referenced, and this is made more confusing by the omission of Figure 12 as Appendix L. It is suggested that the reference to the Otamatea West Structure Plan is clarified throughout the Plan Change documents including specific reference to the Otamatea West Structure Plan area on the legend to the planning maps. For further details see Section 5 of Table 1 of this submission.

3. CONCLUDING COMMENT

3.1 Powerco appreciates the opportunity to input to Plan Change 46-Otamatea West of the Whanganui District Plan as detailed above. Powerco seeks to ensure that the construction of new electricity infrastructure required for additional development at Otamatea West is able to be appropriately provided and staged as development anticipated by the Plan Change progresses.

3.2 Powerco would be pleased to discuss any of the matters raised above, and comment on any documents produced as a result of this submission. If you have any queries or require additional information please do not hesitate to contact Gemma Kean (03 378 0926).

Table 1: Specific changes requested to Plan Change 46-Otamatea West of the Whanganui District Plan by Powerco

Specific provision that this submission relates to	Powerco supports / opposes	Requested decision (additions underlined and deletions are shown with a ~~strikethrough~~)	Reasons
2. Chapter 4: Residential Development **Policy 4.3.10**	Support subject to amendment	g. Integrates other infrastructure within the Structure Plan area including the electricity distribution network.	Powerco proposes additional text (clause g) so that development in the Structure Plan area does not inhibit the construction of the electricity infrastructure required to meet the proposed development.
3. Chapter 13: Subdivision and Infrastructure **Policy 13.3.35 e.**	Support	e. Infrastructure is developed in a logical sequence, and generally designed and located as shown on the relevant Plan.	The Otamatea West Structure Plan does not include any provision for electricity infrastructure. However, Powerco supports the development of additional electricity infrastructure in a logical sequence as development progresses.
4. Chapter 13: Subdivision and Infrastructure **Policy 13.3.38**	Support	Avoid any land use and/or subdivision development that allocates reticulated infrastructure intended to service the Springvale Indicative Future Development Area or the Otamatea West Structure Plan Area (OWSPA) to other areas. Sufficient existing capacity must be available in the infrastructure catchment to provide for the scale of development proposed.	Powerco supports this Policy as the electricity infrastructure required for the Otamatea West Structure Plan will be serviced from the existing 11kV cable off Tirimoana Place and the existing overhead lines on State Highway 3. Electricity infrastructure also needs to be constructed prior to residential development occurring appropriate to the scale of development proposed.
5. Referencing to the 'Otamatea West Structure Plan'	Amendment	All references to the Otamatea West Structure Plan should instead reference the Otamatea West Structure Plan Report (prepared by Opus International Consultants Limited 2017) Figure 11- Proposed District Plan zones and Figure 12- Proposed Otamatea West Structure Plan'. Alternatively, Figure 12 should be incorporated as an appendix in the Plan Change as per the Section 32 report. Given that the planning maps will supersede the Otamatea West Structure Plan	The plan change references the 'Otamatea West Structure Plan' throughout the document. It is unclear what specific document and the diagrams within it are being referenced. It is suggested that the reference to the Otamatea West Structure Plan is clarified and appropriately referenced as a report outside the plan if that is the intention.

		Report, the reference to pink areas should be deleted and appropriately identified on the planning maps. The legend should also specifically identify the Otamatea West Structure Plan, rather than just reference "Structure Plan"	

Powerco Assets surrounding Taylors Rd / Tirimoana Place

Whanganui

N

0 30 60 120 180 240

Meters

Disclaimer: The maps supplied may not show all of Powerco's electrical assets in the relevant areas because additional assets may have been installed recently that have not yet been recorded in Powerco's Geographic Information System. The map data does not show conductors that are known as privately owned or owned by other network owners.

- Distribution Transformer
- Poles
- Distribution Box
- Surface Box
- SubTransmission OH Line
- SubTransmission UG Cable
- HV Distribution OH Line
- HV Distribution UG Cable
- LV OH Line
- LV UG Cable

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* ROBERT BRUCE CHAMBERLAIN

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:**

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

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

2. The specific provisions of the proposed plan change that my submission relates to:
   My view is that the zone change of N°46 is ill considered and that it needs to be extended

   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)*:
   the area of the zone change should extend to the right hand side of Sandcroft drive as far as the city boundary – I intend to subdivide a paddock at 12 Sandcroft dr and this will avoid a resource consent.

   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)*:
   I wish the plan be reconsidered and extended to the city boundary.

   Use additional pages if required

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

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

7. **Address for service:**
   12 Sandcroft Drive

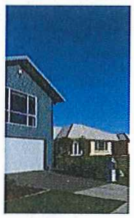
   Signature:

   4/10/17

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

   Day time phone No: 0274535100

Rob@robchamberlain.co.nz



Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* Keryn Amon

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:**

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

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

2. The specific provisions of the proposed plan change that my submission relates to:
I am in full support of the full plan change

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)*:
I support the Plan Change. I have land in the area, some of which I have subdivided and sold. Through this I now have a database of people that want to purchase in the area to reside perminatly.

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)*:
The change needs to go through given the high demand for the future section's # in the affected area. Our city has no provision for high end elevated sites with views which I have found people that are moving to Wanganui want the opportunity to purchase.

Use additional pages if required

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

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

7. Address for service:
P.O. Box 7082
Wanganui 4541

Signature:

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

Day time phone No: 027 2928752

Email: keryn@dml construction.co.nz Date: 05/10/2017

D-246215

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* BENNETT FAMILY TRUST AKA D.W.A. BENNETT

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:**

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

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

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

   THE AREA OF THE PLAN CHANGE

   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)***:

   PLEASE SEE ATTACHED NOTE & MAP.

   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)***:

   PLEASE SEE ATTACHED NOTE + MAP

   Use additional pages if required

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

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

7. Address for service:

21 SANDCROFT DR
WANGANUI

Signature: D W A Bennett

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

Day time phone No: 021 650902

Whanganui District Council
06 OCT 2017
RECEIVED

Email: david@pacifichelmets.com **Date:** 5/10/17

D-246215

Plan Change 46

3. My submission is that the current area of Plan change 46 is ill-considered.

We are not opposed to the Plan change, but there is no consideration of the Eastern side of Sandcroft Drive, where all the services are in place, but which development is currently limited by the minimum Lot size of 5000M2.

The area of PC 46 should therefore be extended South-West to reach properties on the Eastern (RHS) of Sandcroft Drive.

Secondly, with regards to Note 4 (Below) PC 46 should be further developed in order to consider at this stage, the larger area of development which I have suggested could be described as PC 46B. This should contemplate the connection of roading in PC 46 with Taylor Road to Tayforth Road as the logical next stage.

4. I seek the following decision from Council, that subsequent planning be advanced so that for the future information and benefit of all land-owners that the attached map (Submission 4), that a further PC 46B be progressed. This would further advance the capacity of Whanganui City to develop a new subdivision on land very suited to urban development as its is sandy, slightly elevated (mostly with the exception of the Otamatea valley). The valley floor is low-lying, prone to flooding and has no existing exit path for surface water. Because this valet area with it's natural ponding is effectively a wild-life area, a reserve should be proposed as ther are water fowl (Birds) of many varieties and among these are very rare Dab-chicks (NZ Grebe/Weweia)) and other water bird life which are protected. This area could be developed in a reserve for walkers and cyclists and linked to the cycling network West and South.

I declare a partial interest in the event that the Plan Change were to proceed, as my Family Trust owns land in the valley, but we are not expected to personally profit from this possible development.

OTAMATEA WEST STRUCTURE PLAN

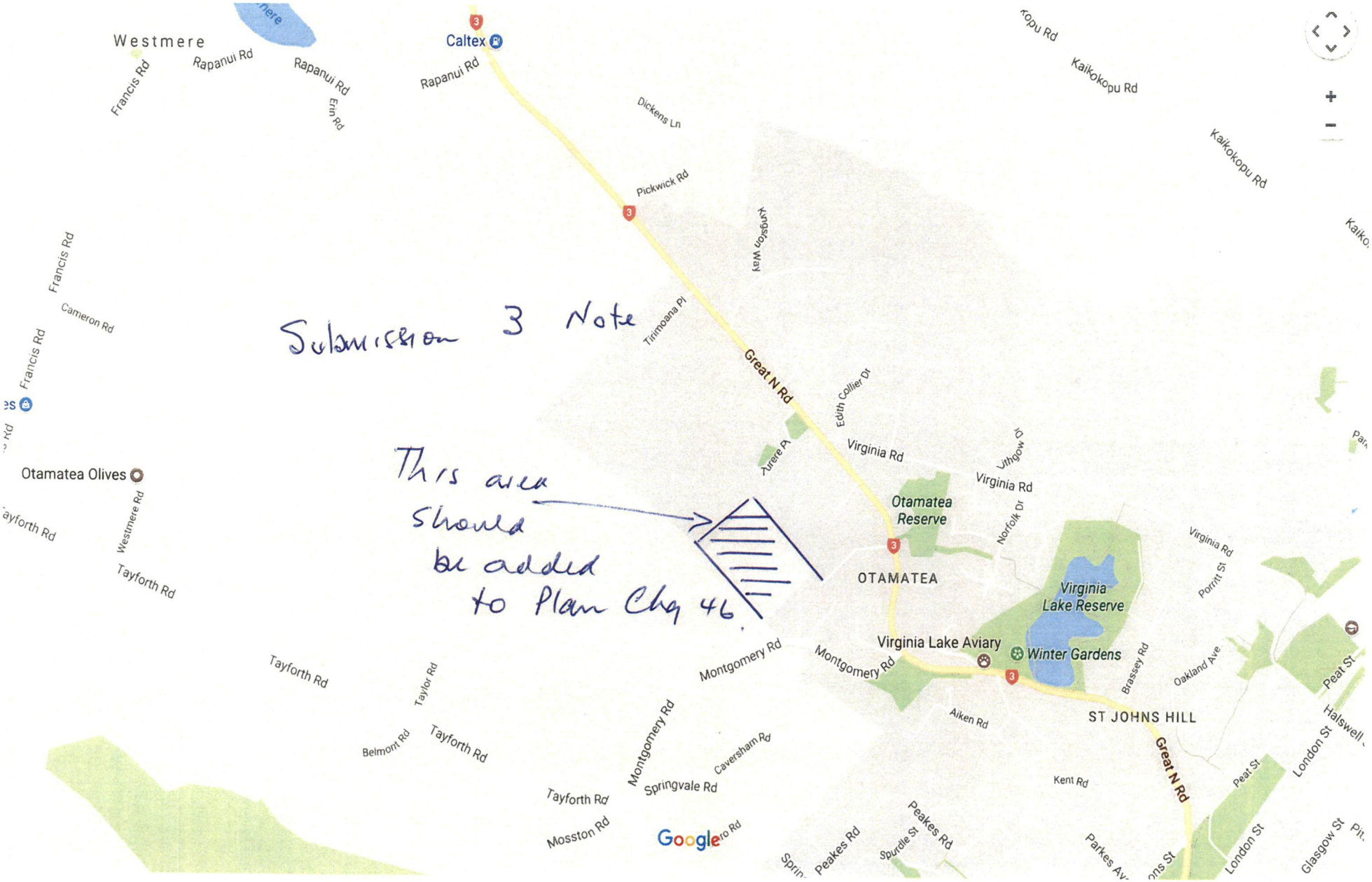
KEY

- NEW WATER
- NEW WASTEWATER
- NEW LOW PRESSURE WASTEWATER PUMP SYSTEM
- STORMWATER
- PARCEL
- 6 ARCHAEOLOGICAL SITE
- NEW WASTEWATER PUMP STATION
- RESIDENTIAL ZONE BOUNDARY
- RESIDENTIAL ZONE WITHIN STUDY AREA
- STORMWATER CATCHMENT A
- STORMWATER CATCHMENT B
- PROPOSED ROADS
- PROPOSED WALKWAYS
- STORMWATER DETENTION AREA
- PLANTING RESERVE
- ADDITIONAL WATER PUMP

0 50M 100M

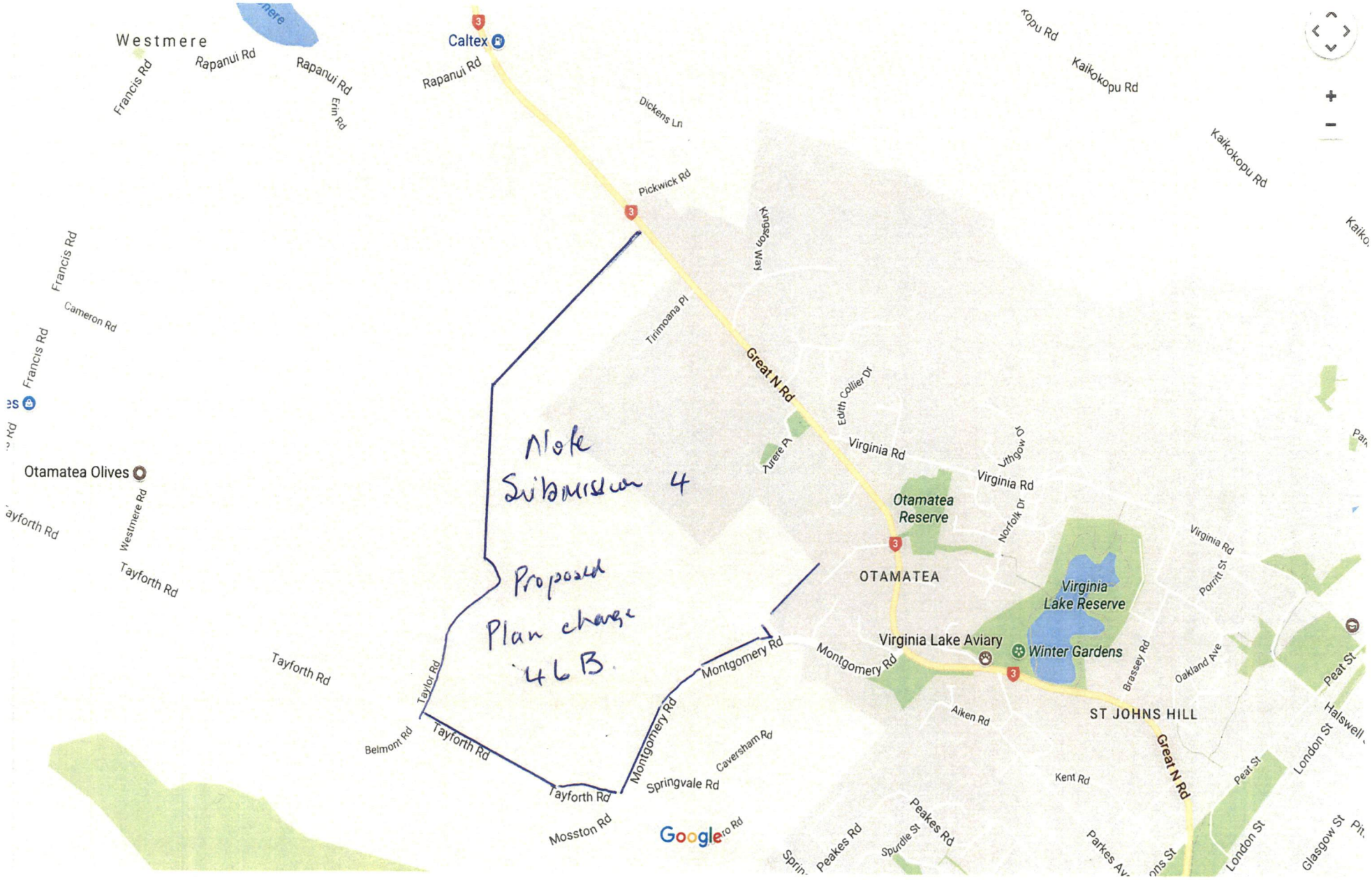
M1:2000 @ A3

See map to Sou. draft for.



Submission 3 Note

This area should be added to Plan Chg 46.


Westmere
Francis Rd
Rapanui Rd
Rapanui Rd
Erin Rd
Caltex
Rapanui Rd
Dickens Ln
Pickwick Rd
Kaikokopu Rd
Kaikokopu Rd
Kaikokopu Rd
Kingston Way
Francis Rd
Cameron Rd
Francis Rd
Tirimoana Pl
Great N Rd
Edith Collier Dr
Virginia Rd
Virginia Rd
Otamatea Olives
Aurere Pl
Otamatea Reserve
Norfolk Dr
Westmere Rd
Tayforth Rd
Tayforth Rd
OTAMATEA
Virginia Lake Reserve
Virginia Rd
Porritt St
Note
Submission 4
Proposed
Plan change
46B
Virginia Lake Aviary
Winter Gardens
Montgomery Rd
Montgomery Rd
Brassey Rd
Oakland Ave
Peat St
Tayforth Rd
Taylor Rd
Aiken Rd
ST JOHNS HILL
Great N Rd
Belmont Rd
Tayforth Rd
Montgomery Rd
Caversham Rd
Springvale Rd
Kent Rd
Peat St
London St
Tayforth Rd
Mosston Rd
Peakes Rd
Spurdle St
Peakes Rd
Parkes Av
London St
Glasgow St
Google

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* Stephen Turner

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:** 6-8-17

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

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

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

   The proposed road included on the enclosed map beside 187B Great North Rd.

   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)***:

   The proposed road is right beside our drive way and would make it dangerous to exit the property. It also increases road frontage and reduces privacy by increasing both road and foot traffic.

   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)***:

   That this proposed road be removed from the plan.

   Use additional pages if required

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

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

7. Address for service:

187B Great North Rd
Otamatea
Wanganui 4501

Signature: S E Turner

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

Day time phone No: 0210850150

Email: smileycoyote48@gmail.com **Date:** 4/19/17

D-246215

OTAMATEA WEST STRUCTURE PLAN

road in contention! at this end.

KEY

- NEW WATER
- NEW WASTEWATER
- NEW LOW PRESSURE WASTEWATER PUMP SYSTEM
- STORMWATER
- PARCEL
- 6 ARCHAEOLOGICAL SITE
- NEW WASTEWATER PUMP STATION
- RESIDENTIAL ZONE BOUNDARY
- RESIDENTIAL ZONE WITHIN STUDY AREA
- STORMWATER CATCHMENT A
- STORMWATER CATCHMENT B
- PROPOSED ROADS
- PROPOSED WALKWAYS
- STORMWATER DETENTION AREA
- PLANTING RESERVE
- ADDITIONAL WATER PUMP

0 50M 100M

M1:2000 @ A3

Stephen Turner
187a Great Nth Rd
Wanganui

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* Graeme Walker Young.

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:** 6.10.17

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

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

2. The specific provisions of the proposed plan change that my submission relates to:
   Extend proposed zoning to include land serviced mainly by Sandcroft Drive and a smaller portion from Ct. Nathan Rd.
   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)***:
   An extension to the proposed area of rezoning to include land adjacent to Sandcroft Drive. Significant sections in this area are of a size promoted ~~for~~ for the rezoned land. Sandcroft Drive is serviced with City water, waste and water services.
   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)***:
   Extend area to be included in West Otamatea proposal as shown on the attached plan.
   Use additional pages if required

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

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

7. **Address for service:**
   22 Sandcroft Drive
   Westmere, Wanganui 4540

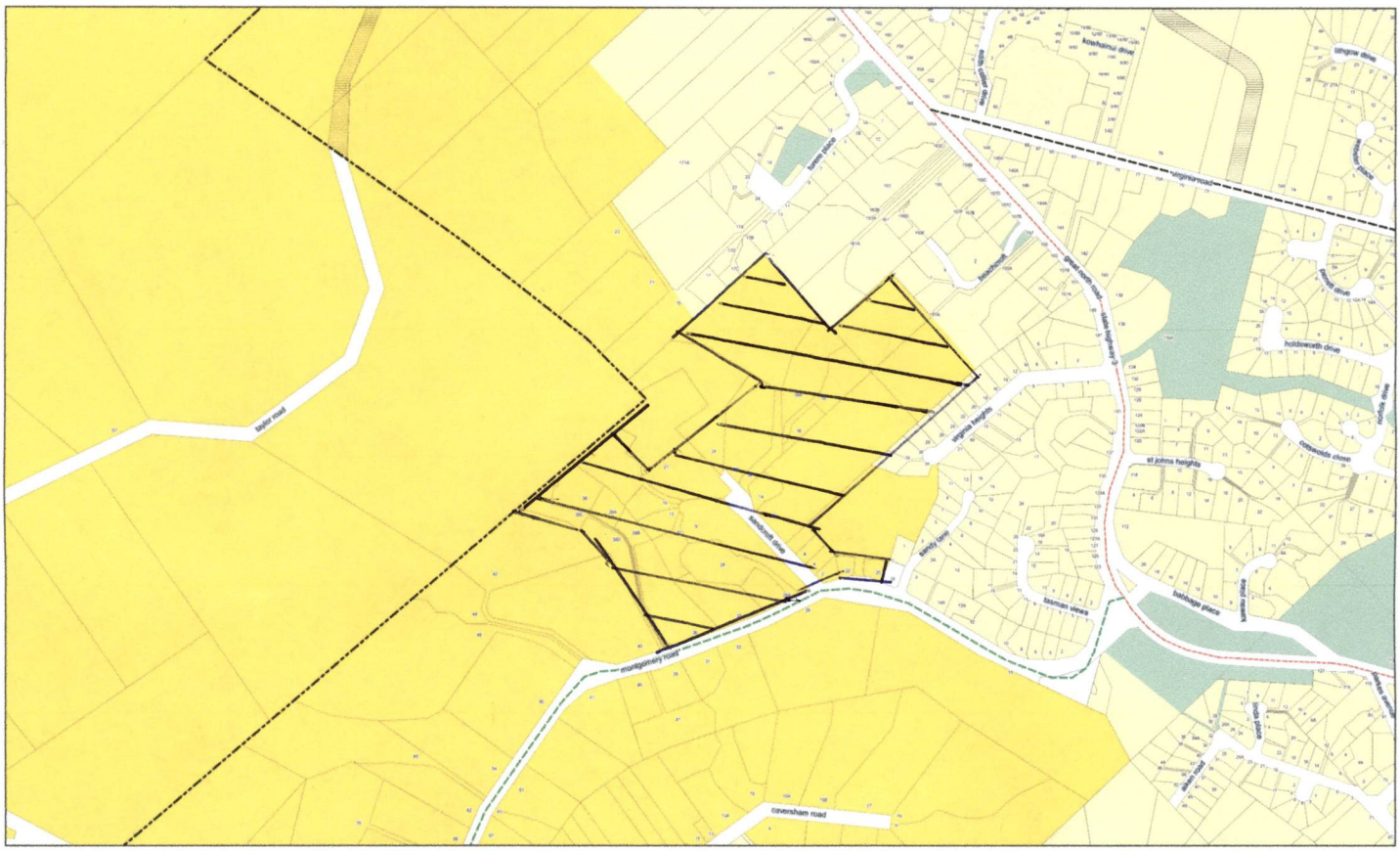
Signature:

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

on 5/10/2017 **Day time phone No:** 0274444740

Email: Graeme@Young.org.nz **Date:** 25.10.17

D-246215



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U23	U24	U25	U26	U27
	U28	U29	U30	U31
		U32	U33	U34

Whanganui District Plan

Grid Reference: Urban 8

0 100 200 300 400 500 m

Scale

North

G.W. Young

Plan Change 46

Possible additional area

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* Te Rūnanga o Tūpoho

This is a submission on Plan Change No. ..... to the Whanganui District Plan. Closing Date:

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

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

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

   Proposed plan change 46 Otamatea West

   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)***:

   We support in theory and wish to be involved in Refining it further.

   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)***:

   We support in theory and wish to be involved in refining it further

   Use additional pages if required

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

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

7. Address for service:

John Maihi
Kaiwhakahaere
Te Rūnanga o Tūpoho

Signature:

PP

(Person making submission or person authorised to sign

Daytime phone No. 0221605185

Email: jillsheehy@xtra.co.nz **Date:** 6/10/17

D-246215

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* MICHAEL ROBERT O'SULLIVAN

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:**

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

   (b) **I am/am not*** directly affected by an effect of the subject matter of the submission that adversely affects the environment; and does not relate to trade competition or the effects of trade competition (**please delete one*).

2. The specific provisions of the proposed plan change that my submission relates to:
   GENERAL SUPPORT FOR THE PROPOSED PLAN CHANGE.

   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.

   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)*:
   ADOPT PLAN CHANGE 46.

   Use additional pages if required

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

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

7. **Address for service:**
   PO BOX 4136
   WHANGANUI 4500

   Signature: M.R. O'Sullivan

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

   Day time phone No: 345 8828.

Email: mike@nzsurveyor.co.nz **Date:** 6/10/17.

D-246215

Michael O'Sullivan B.SURV, MNZIS
DIRECTOR

Harrison&O'Sullivan Ltd
LICENSED CADASTRAL SURVEYORS • LAND DEVELOPMENT CONSULTANTS

13 Church Place, PO Box 4136
Whanganui 4541, New Zealand
ph 06 345 8828 fax 06 345 3606
mob 027 288 8015 a/h 06 343 9442
email mike@nzsurveyor.co.nz

6 October 2017

Submission for Plan Change 46 – Otamatea West

I support the proposed plan change 46 for the following reasons;

1. Increasing demand for land that is suitable for residential development will result in ad-hoc development. The proposed plan change will facilitate a more coordinated approach, in an area regarded as attractive for residential development.

2. The resulting development will not involve highly productive Class I & II soils. The structure plan report suggests that the soils in this area are suitable for residential development if earthworks are designed in sympathy with the existing topography. Available sites of this nature are limited within and immediately our city.

3. Development in this locality will serve as a catalyst for the creation of a storm water management system within the Otamatea Basin. As identified in the structure plan report, I believe that there is potential for the creation of an open-air space, incorporating a series of retention ponds including the provision of pedestrian and cycle way linkages. This will not only cater for additional residential development, but improve the management of the existing catchment whilst creating a recreation resource for the wider community.

Michael O'Sullivan B.Surv., MNZIS
Registered Professional Surveyor

Resource Management Act 1991
Submission on a Publicly Notified Plan Change To The Whanganui District Plan
In accordance with Form 5 – RM (Forms, Fees and Procedure) Regulations 2003

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: *(print in full)* ANNE-MARIE BROUGHTON, KAIWHAKAHAERE, TE KAAHUI O RAURU.

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:** 06/10/17

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

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

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

   Please see attached correspondence/ submission

   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)***:

   Please see attached correspondence/ submission

   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)***:

   Please see attached correspondence/ submission

   Use additional pages if required

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

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

7. Address for service:

TE KAAHUI O RAURU
PO Box 18
WAVERLEY 4544

Signature:

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

Day time phone No: 06 3465707

Email: puntaiao@raunu.iwi.nz **Date:** 06/10/17

D-246215

Te Kaahui o Rauru
14 Fookes Street • PO Box 18 WAVERLEY 4510 • +64 6 346 5707

6 October 2017

Email: Leayne.Huirua@whanganui.govt.nz
Whanganui District Council
101 Guyton Street
WHANGANUI

Teenaa koe Leayne

SUBMISSION ON PLAN CHANGE 46 OTAMATEA WEST

Te Kaahui o Rauru recognises the aspirations of Whanganui District Council to prepare for the city's growth as evidenced in Plan Change 46. We also recognise that Plan Change 46 pertains to an area within Ngaa Rauru Kiitahi's area of interests, as outlined in the Ngaa Rauru Kiitahi Deed of Settlement.

The area is of archaeological significance, including recorded archaeological sites, which indicates a history of occupation by tangata whenua and the potential for unrecorded archaeological information in the wider study area. This translates to cultural and historical value to Ngaa Rauru Kiitahi. As such, we appreciate the opportunity to contribute our thoughts as outlined in this letter and the attached Form 5.

We note we have been contracted by the Council to provide an interim cultural values report to contribute to this assessment. While there has been value in being able to produce a summary document, the timeframes in which we have been required to work have been frustrating. We encourage proactive and early engagement for future similar scenarios.

We seek stronger recognition of the cultural significance of this area, including consideration of alternative names for this area.

Our priority requirement is to understand how cultural values and heritage will be protected in this area as it is not clear what protections will be implemented, regardless of whether the land is rezoned. As such, we cannot currently support the rezoning proposed.

As context, we highlight the discovery of an urupaa (burial site) containing human bones at a nearby site, Rapanui Road, in 2008-09. We hold concerns around the recent construction activity in the area occurring without appropriate archaeological or cultural advice.

We support the addition of known archaeological sites to the District Plan and the application of an archaeological site layer over the whole area, combined with stronger advocacy by the Council around the heritage values present.

In addition, we seek Ngaa Rauru Kiitahi and Tamareheroto to be identified as affected parties in relation to activities in this area.

We wish to speak to this submission.

We look forward to a meaningful relationship and engagement process with Whanganui District Council continuing and growing into the future.

Naaku noa, naa

Anne-Marie Broughton
Kaiwhakahaere

BEFORE THE WHANGANUI DISTRICT COUNCIL

IN THE MATTER	of the Resource Management Act 1991
A N D	
IN THE MATTER	of a submission by Whanganui Land Settlement Negotiation Trust on the Whanganui District Council District Plan pursuant to Clause 6 of Schedule 1, Resource Management Act 1991
A N D	
IN THE MATTER	of Plan Change No. 46

SUBMISSIONS ON BEHALF OF THE WHANGANUI LAND SETTLEMENT NEGOTIATION TRUST

Dated 6 October 2017

1.0 Introduction

1.1 On 6 September 2017, the Whanganui District Council ("WDC") issued public notice of Plan Change No. 46 ("PC46") and its intention to rezone the land at Otamatea West from Rural Lifestyle to residential zoning and establish a policy that encourages development to reach the key objective of the housing shortage in Whanganui.

1.2 WLSNT is directly affected by an effect of the proposed plan change that adversely effects the environment. This submission does not relate to trade competition or the effects of trade competition.

1.3 This submission is made on behalf of the Whanganui Land Settlement Negotiation Trust ("WLSNT") and the iwi, hapū and marae of Whanganui ("Whanganui Iwi"). WLSNT makes this submission in relation to PC46 to the Whanganui District Plan.

1.4 WLSNT seek that their interests as tangata whenua are made known in the Otamatea West area and that their interests as tangata whenua be recognised in the ongoing and future development of PC46. WLSNT, in principle, opposes PC46 and outline these reasons below.

1.5 WLSNT wishes to speak to this submission.

2.0 Background

2.1 WLSNT ask that this submission be considered in the context of tangata whenua perspectives given their rights and interests in Whanganui have been severely impacted on by the Crown through various acts and omissions that were inconsistent with the principles of the Treaty of Waitangi/te Tiriti o Waitangi.

2.2 Their role as kaitiaki and ability to exercise tino rangatiratanga over their taonga, including wāhi tapu and wāhi tūpuna, has been eroded by Crown processes since 1840. A prime example of this is the 1848 land confiscation which led to the alienation of Whanganui Iwi from their ancestral lands, severing the ability of tangata whenua to continue customary practices including occupation of the Otamatea West area.

2.3 The area known to WDC as Otamatea West is associated with a congruent of iwi, hapū and whānau in Whanganui. The main iwi with interests in this area are

Whanganui and Ngā Rauru Kiitahi. The Otamatea West area has been identified by tangata whenua as ancestral land of significance, once populated by early ancestors of Ngā Aruhe. There is archaeological evidence, held within the confines of WDC, to confirm this. Otamatea West is known to tangata whenua as wāhi tūpuna (ancestral land) and as a direct consequence encompasses and contains wāhi tapu (sacred land).

2.4 The relationship that Whanganui Iwi shares with wāhi tapu and wāhi tūpuna is layered with elements of tikanga, identity and reciprocity. There are a number of values that underpin this relationship and Māori see this connection to wāhi tūpuna as a lasting connection to their ancestors. As outlined in more detail in the Cultural Values Report ("the Report"), it compels respectful interaction with the environment and people of the land, both past and present.

3.0 Legal Framework

3.1 WDC is obligated by the Resource Management Act 1991 ("the Act") to recognise, as a matter of national importance, the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu and other taonga.[1] Further, requirements in terms of participation and the establishment of processes to provide opportunities for Māori to contribute to decision making processes of local authorities are outlined in the Local Government Act 2002.[2]

3.2 Both the Act and the Local Government Act require local authorities to take a considered approach to their decision making processes in a way that provides for further understanding of Māori interests and values. It also strengthens the partnership that the Treaty of Waitangi/te Tiriti o Waitangi envisaged in 1840.

District Plan

3.3 Chapter 15 of the Whanganui District Plan acknowledges tangata whenua. Policy 15.1.1 deals with tangata whenua issues as follows:[3]

---

[1] Resource Management Act 1991, s 6(e).
[2] Local Government Act 2002, s 81(1).
[3] Whanganui District Council, *District Plan* (16 July 2016), Whanganui District Council Te Kaunihera a Rohe o Whanganui <http://www.whanganui.govt.nz/our-district/district-plan-text/district-plan/Documents/Chapters/Chapter%2015%20Tangata%20Whenua%20and%20Papakainga%20October%202017.pdf>

> *…the Act places an obligation on people and organisations to take into account the principles of the Treaty of Waitangi, and to consult with tangata whenua. To do so, requires goodwill, trust and communication.*

3.4 WLSNT acknowledges that there is an opportunity within this submission to share their views, trusting that their views will be considered with goodwill based on the existing relationship between Whanganui Iwi and WDC.

PC46

3.5 Policy 14.3.3 of PC46 deals with Māori values in relation to the necessary earthworks required to redevelop the zoning. The policy promotes mitigating any potential effects on cultural values and tangata whenua where large scale earth works are proposed, by:[4]

> *incorporating tangata whenua values and practices into earthworks and land modification methods; and requiring cultural and/or archaeological assessments, enabling site access and appropriate site work observation for tangata whenua.*

3.6 Policy 15.3.3 discusses the protection of sites and places of value to Māori as follows:[5]

> *…sites of value to Māori may include marae, wāhi tapu (canoe landing sites, burial grounds [urupā], battlefields, islands, and areas of spiritual significance) and taonga (rivers, lakes, waterways, mountains, wildlife species and plants). An important consideration in the protection of Māori sites is the need to ensure protection from deliberate or accidental interference or destruction. This includes finding and implementing methods to protect the information from common usage, but to ensure the location of sites is identified in some way to intending developers.*

---

[4] Whanganui District Council, *Phase 6 – District Wide, Provisions, Land Stability, Noise and Futre Residential* (2015) Whanganui District Council Te Kaunihera a Rohe o Whanganui <http://www.whanganui.govt.nz/our-district/district-plan-text/Documents/NOTIFICATION%20Plan%20Change%2046%20Otamatea%20West%20Marked%20up%20text.pdf>

[5]

3.7 Although WLSNT understand that the above provisions obligate WDC to protect the sites that are of value to Māori, we do not consider that the PC46 recognises the importance of protecting wāhi tapu and taonga when there is no indication on what methods will be used.

3.8 WLSNT believe that the re-zoning of the area from Rural Lifestyle to Residential would perpetuate cultural disconnection and lead to further destruction of ancestral lands and heritage. Tangata whenua aspire to reconnect with the ancestral lands that were taken from them as part of the 1848 land confiscation. This reconnection with the land is vital for WLSNT to maintain the relationship with the Otamatea West area and the various wāhi tapu and wāhi tūpuna that lie therein.

4.0 Submission

4.1 In line with the Report, we submit our opposition to PC46 based on:

(a) The need to preserve and protect ancestral heritage;

(b) The wellbeing of the land and its people; and

(c) The desire and right of tangata whenua to reconnect with ancestral lands wrongfully taken as part of the 1848 land confiscation.

4.2 We acknowledge the consultation undertaken in the initial stages of the development by WDC as recorded in the Section 32 Report.[6] We understand that the outcome of the consultation with tangata whenua is to develop a scoping report of the cultural values of the area. We have reviewed the Report and support the values discussed and the recommendations made.

4.3 We therefore seek that the interests of WLSNT as tangata whenua over the land subject to PC46 be made known to WDC and that ongoing consultation continue in this regard.

4.4 We also support the recommendations made in the Report and seek that they be incorporated into PC46, namely that:

[6] Whanganui District Council Policy Team, *District Plan Review Phase Six - Section 32 Report Proposed Plan Change 46 Otamatea West* (August 2017), at pp 8-9.

(a) WDC recognise the cultural values outlined in the Report;

(b) WDC recognise the significance of the Otamatea West area to tangata whenua;

(c) WDC continue to communicate in a transparent manner with all tangata whenua with expressed interest in the Otamatea West area;

(d) WDC, with tangata whenua, proactively pursue to protect the cultural/heritage values inherent in the Otamatea West area; and

(e) WDC retains the present Rural Lifestyle Zoning Classification over the area known as Otamatea.

4.5 WLSNT understands that the public are able to comment further on the cultural report when it is available and if needed, seeks leave to revisit this submission when any new information is available.

4.6 If others make similar submissions, we confirm that we would be prepared to consider presenting a joint case with them at any hearing.

Address for service: 29 Victoria Avenue, PO Box 4262, Whanganui 4500
Day time phone No: 027 467 7111
Email: whanganui.ls@xtra.co.nz

Dated: 6 October 2017

RS-430070-6-11-V3:RS

100 Willis Street
Level 5, Majestic Centre
PO Box 5084, Lambton Quay
Wellington 6145
New Zealand
T 64 4 894 5200
F 64 4 894 3305
www.nzta.govt.nz

6 October 2017

Whanganui District Council
Po Box 637,
101 Guyton Street
Whanganui

Attention: Leayne Huirua

Dear Leayne

Whanganui District Council District Plan: Proposed Plan Change 46: NZ Transport Agency Submission

Thank you for the opportunity to submit on the Proposed Plan Change 46: Otamatea West. Please find attached the NZ Transport Agency's submission.

We welcome the opportunity to discuss the content of our submission with Council officers. If you have any further questions, please do not hesitate to contact Kathryn Barrett on (04) 931-8871 or kathryn.barrett@nzta.govt.nz.

Yours sincerely

Cole O'Keefe
Principal Planning Advisor
Strategy, Policy, and Planning
wroplanning@nzta.govt.nz

FORM 5, Clause 6 of First Schedule, Resource Management Act 1991

Submission on Proposed Plan Change 46 to the Whanganui District Council District Plan– Otamatea West

To: **Whanganui District Council**
PO Box 637,
101 Guyton Street
Whanganui

Attention: Leayne Huirua

Via email: Leayne.Huirua@whanganui.govt.nz

From: **New Zealand Transport Agency**
PO Box 5084
Wellington 6145

1.This is a submission on Proposed Plan Change 46 to the Whanganui District Council District Plan – Otamatea West

2.The NZ Transport Agency could not gain an advantage in trade completion through this submission.

3.We wish to be heard on this matter.

4.Role of the NZ Transport Agency

4.1. The NZ Transport Agency's (Transport Agency) objective, functions, powers and responsibilities are derived from the Land Transport Management Act 2003 (LTMA), and the Government Roading Powers Act 1989 (GRPA). The statutory objective of the Transport Agency is "to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest[1]."

4.2. The Transport Agency has a mandate under the LTMA, GRPA, and the Government Policy Statement on Land Transport to carry out its functions in a way that delivers the transport outcomes set by Government. These outcomes are:

- Transport that is effective in moving people and freight where they need to go in a timely manner.

[1] Section 94, Land Transport Management Act 2003

NZ TRANSPORT AGENCY
WAKA KOTAHI

- Transport that is efficient, delivering the right infrastructure and services to the right level at the best cost.
- A transport system that is safe and responsible, reducing the harms from transport.
- A transport system that is resilient, able to meet future needs and endure shocks.

4.3. The Transport Agency is a Crown entity[2], with the sole powers of control and management for all purposes of all state highways[3]. The Transport Agency is also an investor in the Whanganui District's local road network, funding maintenance and operations, renewals, capital works and public transport services. As an investor, we have a significant interest in seeing that land use planning for the District is integrated with the transport system. We also have an interest in present and future land use decision-making to ensure that the public receive value for money transport outcomes from our investment.

4.4. The Government Policy Statement (GPS) 2015/16 – 2024/25 on Land Transport issued by the Minister of Transport came into effect on 1 July 2015, and sets out the Government's objectives and funding priorities for the land transport sector for a six-year period, with further indicative information for the following four years. The Transport Agency must give effect to the GPS when performing its functions in respect of land transport planning and funding[4]. The current GPS confirms that economic growth and productivity remains the primary objective for land transport expenditure, and extends this to include value for money and road safety as additional priorities. In addition to investing in the state highway network, the GPS identifies quality investments in public transport and improving the local road network both have roles to play. All of these areas of focus are directly relevant to the Whanganui District's transport network and the relationship between land use planning, network management, and transport investment.

4.5. The GPS also sets strong expectations regarding the role of integrated planning in transport investment. This means that, in order to ensure funding in the land transport system, including investment in local roads, is consistent with government objectives, it is essential that a policy framework aligns land use and transport planning within Whanganui District.

4.6. While the Transport Agency is responsible for managing the state highway network, it is also interested in other parts of the strategic network, listed above. State highways do not operate in isolation and are reliant on other forms of transport to perform its functions and operate as 'one network', with local roads and public transport networks.

5.Submission

5.1. The Transport Agency is generally supportive of planned and integrated growth. A planned and integrated approach, often, means that better integrated planning outcomes are achieved.

[2] Section 93(2), Land Transport Management Act 2003
[3] Section 61(1), Government Roading Powers Act 1989
[4] Section 70(1), Land Transport Management Act 2003

NZ TRANSPORT AGENCY
WAKA KOTAHI

5.2. The Transport Agency supports plan provisions which:

- Recognise the function of the state highway and the necessity for any development to ensure that the safe, efficient, effective and resilience of the state highway is not detrimentally affected.
- Are supported by robust and comprehensive analysis.

6.Integrated Transport Assessment

6.1. Proposed Plan Change 46 (PPC 46) has a number of documents that support the proposed provisions and structure plan layout. One document that is absent from the PPC 46 documentation is evidence that an Integrated Transport Assessment (ITA) has been undertaken by the Council to inform the layout of the internal road network as well as the capacity of existing intersections and the suitability (and necessity) of the proposed intersections with State Highway 3.

6.2. The Transport Agency request that provision be made for an ITA to be carried out before any development is undertaken within the proposed structure plan area. Provision should be made for any recommendations raised by an ITA to be implemented before development is permitted. This should be undertaken in conjunction with the Transport Agency, given the sites proximity to the state highway and the number and location of proposed intersections on to the state highway network.

7.Access

7.1. The Transport Agency is concerned with the number and location of the indicative roads that connect with the state highway. Furthermore it is unlikely that they meet the Transport Agency's Planning Policy Manual[5] for minimum separation distances between intersections. This may have a significant impact on the safety of the state highway; both for existing users and future road users of the development area.

7.2. There is an absence of information regarding how the Council expects developers to consider their effects on the existing intersection or what will trigger the development of the new road/intersection.

7.3. It is the Transport Agency's view that an ITA is required to ensure that this Structure Plan is robust.

7.4. Council needs to provide explicit detail in the PPC 46 that states when development reaches a certain threshold, then the existing intersection will then need to be upgraded. An ITA will establish the baseline and what thresholds are acceptable. Until this has been established, no further development should occur. If Council choose to pursue this without an ITA and setting a threshold, then a matter for discretion **must** include the impact on the safe and efficient impacts on the state highway.

[5] NZ Transport Agency Planning Policy manual Appendix 5B: https://www.nzta.govt.nz/assets/resources/planning-policy-manual/docs/planning-policy-manual-appendix-5B.pdf

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8.Structure Plan and the Structure Plan report

8.1. The Structure Plan proposed as part of PPC 46 differs to that presented in the Otamatea West Structure Plan report by Opus[6]. The Section 32 report does not provide a reason why the proposed Structure Plan differs from that of the report. It would be helpful if the reasons for the departure were articulated.

8.2. The Transport Agency considers that the current structure plan layout is defective in providing integrated planning outcomes. The Transport Agency considers that the proposed development does not warrant the number of connections. Furthermore, the Transport Agency considers that due to a lack on an ITA, is not in a position to support the location of the proposed connections to the state highway.

8.3. Without pre-empting the ITA there should be internal connectivity with the proposed local roads which would in essence prevent the need for the number of intersections on to the state highway.

8.4. The Structure Plan report details[7] indicative cost for the proposed infrastructure requirements. It would be useful to understand how these figures were established, given no ITA has been undertaken to guide what is required, and when. This section also only details indicative costs, and not how they will be met. The upgrades to the state highway have not been accounted for by the Transport Agency, so at present is unlikely to receive funding from the National Land Transport Fund. The Transport Agency looks forward to meeting with Council to identify other funding sources to go towards the cost of any required upgrades as a result of development.

9.Connectivity

9.1. The proposed internal road layout could benefit from greater connectivity. The lack of internal connectivity may be a barrier to future public transport or alternative modes of transport. The Regional Policy Statement and the Section 32 report both state that connectivity is important for the region and this development[8]. Additionally, the Section 32 report goes so far as to state that the preferred option (the proposed Structure Plan) would help reduce the number of cul-de-sacs (thereby improving connectivity). The Transport Agency sees more opportunity to explore this and create some connections out of the proposed cul-de-sac[9].

9.2. The Transport Agency requests that the Council consider amending the Structure Plan to achieve greater connectivity to encourage future modes.

[6] Otamatea West Structure Plan, Opus Ltd, no date, http://www.whanganui.govt.nz/our-district/district-plan-text/phase-6/Documents/Otamatea%20Structure%20Plan%20report-%20Final%20v3.pdf
[7] Otamatea West Structure Plan, Opus Ltd, no date, Section 5.5.8, page 30
[8] Whanganui District Council District Plan Review, Phase Six, Section 32 Report, Proposed Plan Change 46, August 2017, Pages 5 and 14-15
[9] Ibid

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10.Specific changes to Policy 4.3

10.1. Policy 4.3.9 should include provision for future development to consider its impact on the safety and resilience of infrastructure. To achieve this, the Transport Agency requests the following (additions are underlined):

- *Residential development at Otamatea West shall ensure quality urban design outcomes and efficient, safe, and resilient infrastructure provisions, with particular regard given to consistency with the indicative road layout, three water infrastructure, historic heritage features and landscaping.*

10.2. Policy 4.3.10 should include provision for future development to consider its impact on the safety and resilience of infrastructure. To achieve this, the Transport Agency requests the following (additions are underlined):

- *Development which propose to vary from the Otamatea West Structure Plan are encouraged provided the following key criteria to ensure quality urban design outcomes and efficient, safe, and resilient infrastructure provision are adhered to, by requiring that development […]*

10.3. Policy 4.3.10 also needs to include specific consideration of the effects of alternations on the transport network. If the Transport Agency's earlier suggestion of an ITA be undertaken prior to development be implemented, then any variation needs to specifically consider its impacts on the transport network. To achieve this, the Transport Agency's suggests an additional provision be added to this policy, as 'g.', or words to similar effect:

- *Considers the impact of the development on the existing or proposed intersections with the state highway, and how this may vary from the previously anticipated effects.*

11.Closing statement

11.1. The Transport Agency considers that the above submission is sufficiently general and has only requested minimal changes to specific issues, objectives and policies, preferring to take an outcome based approach to the submission. The Transport Agency requests that amendments are made to PPC 46 that address the matters raised by the Transport Agency in their submission. We look forward to working with the Council to discuss and work through our submission.

11.2. The Transport Agency **wishes to be heard** in support of its submissions.

Resource Management Act 1991

Submission on a Publicly Notified Plan Change To The Whanganui District Plan

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

PC 46 Submission: LATE 016

WHANGANUI DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

TO: Whanganui District Council, PO Box 637, Whanganui

Name: ***(print in full)*** Steven Archer and Bernard Reuters

This is a submission on Plan Change No. 46 **to the Whanganui District Plan. Closing Date:** 06/10/17

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

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

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

   Minimum Lot sizes within Otamatea West Zone

   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)***:

   We do not support the minimum lot size within the Otamatea West Zone to be limited to 800m². It does not allow for diversity and densities available for different residential options or market demands, and over time if further densification does occur it will cause long right of ways.

   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)***:

   Remove references to minimum lot sizes within the Otamatea West Structure Plan

   Use additional pages if required

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

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

7. Address for service:

Steven Archer
A & C Surveys Ltd
PO Box 4028
Whanganui 4541

Signature:

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

Day time phone No: 06 347 8586

Email: steven.archer@acsurveys.co.nz **Date:** 06/10/2017

D-246215