



WHANGANUI
DISTRICT COUNCIL
Te Kaunihera a Rohe o Whanganui

Whanganui District Plan
Plan Change 55
Miscellaneous

Submissions Received

Submission by Transpower New Zealand Ltd on Whanganui District Plan Proposed Plan Change 55

February 2019

Keeping the energy flowing



FORM 5
SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED
ON WHANGANUI DISTRICT PLAN PROPOSED PLAN CHANGE 55
UNDER CLAUSE 6 OF THE FIRST SCHEDULE TO
THE RESOURCE MANAGEMENT ACT 1991

To: LEAYNE HUIRUA

Whanganui District Council

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

Name of Submitter:

Transpower New Zealand Ltd

Address for Service and Correspondence

Attn: Rebecca Eng

PO Box 17215

Greenlane, Auckland 1546

Email: environment.policy@transpower.co.nz

Ph: 09 590 7072

This is a submission to the Whanganui District Plan Proposed Plan Change 55 - Miscellaneous

Transpower could not gain advantage in trade competition through this submission

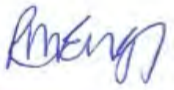
The specific provisions of the proposed plan that the submission relates to are:

Refer attached submission which outlines the specific provisions, reasons and decisions sought

Transpower seeks the following decision from the local authority:

Approve Plan Change 55 as detailed in the attached submission, including such further, alternative or consequential relief as may be necessary to fully give effect to this submission.

Transpower NZ Ltd wishes to be heard in support of its submission.



Signature of submitter

[or person authorised to sign on behalf of the submitter.]

Date: 5 February 2019

**SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED
ON THE WHANGANUI DISTRICT PLAN PROPOSED PLAN CHANGE 55 - MISCELLANEOUS**

Overview

The following provides specific submission points from Transpower New Zealand Limited (“**Transpower**”) on the Whanganui District Plan Proposed Plan Change 55.

Introduction to Transpower

Transpower is a State-Owned Enterprise that plans, builds, maintains and operates New Zealand’s National Grid, the high voltage transmission network for the country. The National Grid links generators directly to distribution companies and major industrial users, feeding electricity to the local networks that distribute electricity to homes and businesses. The National Grid comprises towers, poles, lines, cables, substations, a telecommunications network and other ancillary equipment stretching and connecting the length and breadth of the country from Kaikohe in the North Island down to Tiwai in the South Island, with two national control centres (in Hamilton and Wellington).

The National Grid includes approximately 12,000 km of transmission lines and 166 substations, supported by a telecommunications network of some 300 telecommunication sites, which help link together the components that make up the National Grid.

Transpower’s role and function is determined by the State-Owned Enterprises Act 1986, the company’s Statement of Corporate Intent, and the regulatory framework within which it operates. Transpower does not generate electricity, nor does it have any retail functions.

Transpower’s Statement of Corporate Intent for July 2017 to July 2020, states that:

Transpower is central to the New Zealand electricity industry, connecting New Zealanders to their power system through safe, smart solutions for today and tomorrow. Our principal commercial activities are:

- *As grid owner, to reliably and efficiently transport electricity from generators to distributors and large users.*
- *As system operator, to operate a competitive electricity market and deliver a secure power system*

In line with these objectives, Transpower needs to efficiently maintain and develop the network to meet increasing demand, to connect new generation, and to seek security of supply, thereby contributing to New Zealand’s economic and social aspirations. It must be emphasised that the National Grid is an ever-developing system, responding to changing supply and demand patterns, growth, reliability and security needs. Transpower therefore has a significant interest in contributing to the process of developing an effective, workable and efficient District Plan where it may affect the National Grid, including possible future changes.

Whanganui District Transmission Assets

Transpower has a two transmission lines and two substations within the Whanganui District, all of which are mapped in the operative Whanganui District Plan and enclosed as **Attachment 2**.

Statutory Framework

National Policy Statement on Electricity Transmission

The National Policy Statement on Electricity Transmission (NPSET) was gazetted on 13 March 2008. The NPSET confirms the national significance of the National Grid and establishes national policy direction to ensure decision-makers under the RMA duly recognise the benefits of transmission, manage the effects of the National Grid and appropriately manage the adverse effects of activities and development close to the Grid. The NPSET only applies to the National Grid – the assets used or operated by Transpower – and not to electricity generation or distribution networks.

The NPSET sets a clear directive to councils on how to provide for National Grid resources (including future activities) when drafting all their plans. Thus, district councils must work through how to make appropriate provision for nationally and regionally significant infrastructure in their district plans.

The one objective of the NPSET is as follows:

To recognise the national significance of the electricity transmission network by facilitating the operation, maintenance and upgrade of the existing transmission network and the establishment of new transmission resources to meet the needs of present and future generations, while:

- a. Managing the adverse environmental effects of the network; and*
- b. Managing the adverse effects of other activities on the network.*

It is therefore a requirement that local policy reflects national direction and that the local policy is effective in helping support the integrated management of natural and physical resources within the district, as well as across the region as a whole. Transpower was a submitter and appellant on Whanganui District Plan Change 36 “Rural Review” which gave effect to the NPSET within the Rural Zones of the District. This included the introduction of provisions to regulate subdivision within the National Grid Subdivision Corridor in those zones. Transpower’s interest in Plan Change 55 is to ensure that the provisions continue to give effect to the NPSET within the affected zones.

Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009

The Resource Management (National Environmental Standard for Electricity Transmission Activities) Regulations 2009 (“**NESETA**”) came into effect on 14 January 2010, providing a national framework of permissions and consent requirements for the operation, maintenance and upgrading of National Grid lines existing at 14 January 2010: it does not apply to substations or electricity distribution lines, and nor does it apply to the construction of new transmission lines (which are typically designated).

Activities covered by the NESETA are activities relating to the operation, maintenance, upgrading, relocation or removal of an existing transmission line, including:

- a construction activity
- use of land or occupation of the coastal marine area
- activities relating to an access track to an existing transmission line
- undergrounding an existing transmission line.

Under Section 44A of the RMA, local authorities are required to ensure there are no duplications or conflicts between the provisions of the NESETA and a proposed plan. The NESETA regulates how Transpower’s existing lines in the District are developed and maintained, rather than the District Plan Rules. The scope of Plan Change 55 does not affect the relationship between the District Plan and the NESETA. The provisions of Section 44A are therefore irrelevant in this instance.

Specific Submission Points

Transpower supports the Proposed Plan Change subject to some amendments, the reasons for which are detailed in **Attachment 1**.

Attachment 1: Relief Sought

Notified plan change text is shown as *black italics underlined* and ~~strikethrough~~. Additional amendments sought by Transpower are shown as red underlined and ~~double strikethrough~~.

Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
Chapter 3 Rural Environment			
3.4.2.b – Restricted Discretionary Activities – Subdivision in Rural Production Zone	Support	To the extent that this rule applies to subdivision near the National Grid, Transpower supports the deletion of this rule from Chapter 3 as it will be introduced to Chapter 13. This will streamline the District Plan and continue to give effect to Policy 10 of the NPSET.	That Rule 3.4.2.b be deleted as notified.
3.4.2.c Restricted Discretionary Activities – Subdivision in the Rural Production Zone	Support in part/amend	To the extent that this rule applies to subdivision in the National Grid Subdivision Corridor, Transpower supports the deletion of this rule from Chapter 3 as it will remain within the District Plan in Chapter 13 (Subdivision and Infrastructure). This will streamline the District Plan and continue to give effect to Policy 10 of the NPSET. However, Transpower notes that the notified plan change does not indicate that the entirety of the relevant rule will be deleted (noting that the sub-clauses relating to subdivision in the National Grid Subdivision Corridor cross pages 3-12 to 4-12). It is assumed that it is not Council's intention to retain part of the rule, which would create confusion for plan users.	<p>That the entirety of Rule 3.4.2.c be deleted, as follows:</p> <p>“... <ul style="list-style-type: none"> ● Impact on the operation, maintenance, upgrade and development of the National Grid, including: <ul style="list-style-type: none"> - Compliance with NZECP34: 2001; - <u>The location and orientation of identified Building Platforms relative to the National Grid;</u> - <u>The nature and location of any vegetation proposed to be planted in the vicinity of the National Grid; and</u> - <u>Access to the National Grid.</u> - Risk of electrical hazards affecting public or individual safety, and the risk of property damage.” </p>

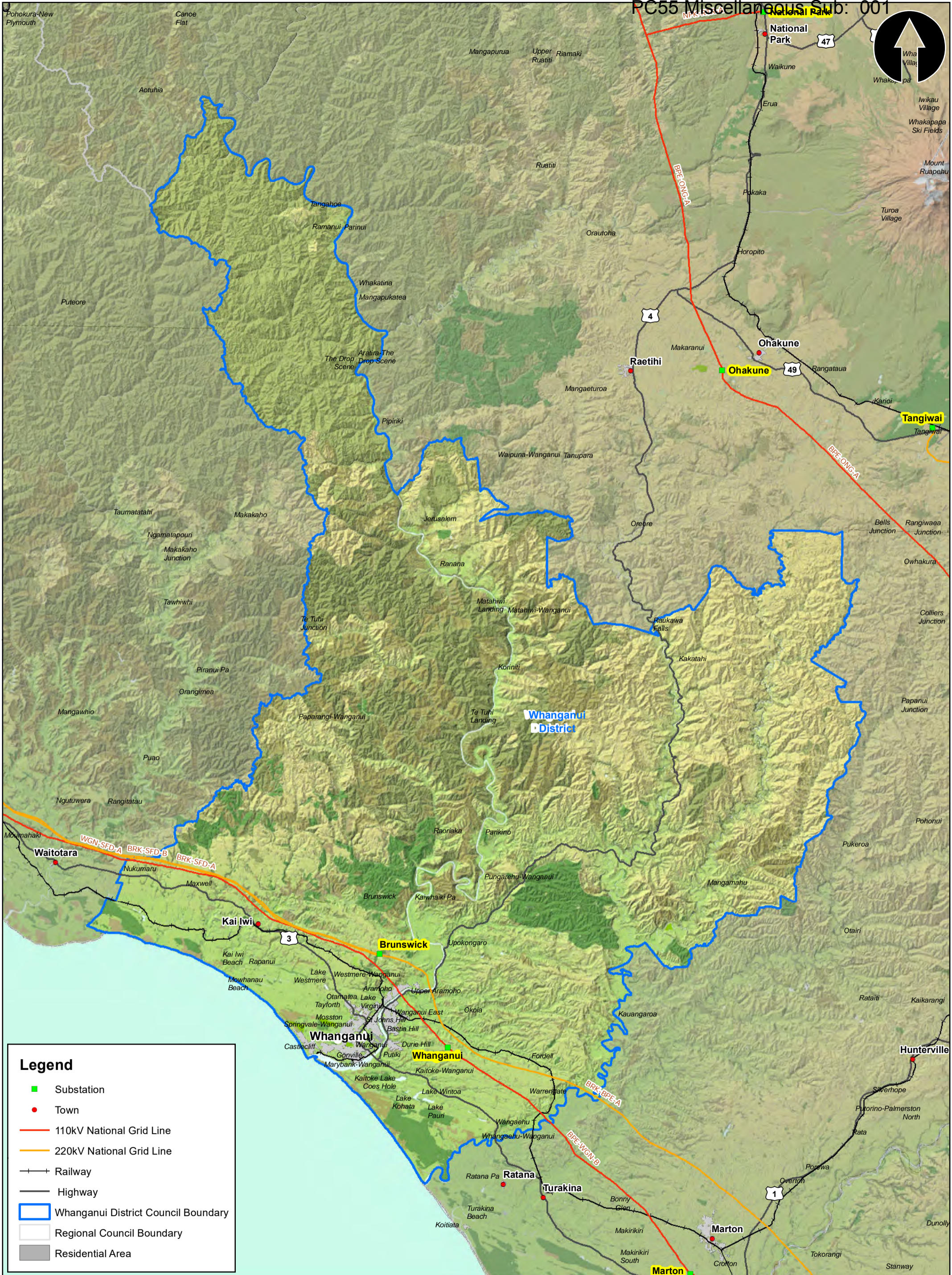
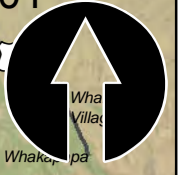
Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
3.4.4.d Non-Complying Activities	Support	Transpower supports the deletion of this rule from Chapter 3 on the basis that it will be introduced to Chapter 13. This will streamline the District plan and continue to give effect to Policy 10 of the NPSET.	That Rule 3.4.4.d be deleted as notified.
3.8.2.b Restricted Discretionary Activities – Subdivision in the Rural General Zone	Support	To the extent that this rule applies to subdivision in the National Grid Subdivision Corridor, Transpower supports the deletion of this rule from Chapter 3 as it will remain within the District Plan in Chapter 13.	That Rule 3.8.2.b be deleted as notified.
3.8.4 Non Complying Activities	Support in part/amend	To the extent that this rule applies to subdivision in the National Grid Subdivision Corridor, Transpower supports the deletion of this rule from Chapter 3 as it will remain within the District Plan in Chapter 13. However, for the avoidance of doubt, Transpower seeks edits to the “residual” text in Rule 3.8.4 to ensure that the rule is clear (it is noted that the notified version of the residual text differs slightly from the operative text):	<p>That Rule 3.8.4 be amended as follows:</p> <p>“3.8.4 Non Complying Activities The following are non-complying activities in the Rural General Zone:</p> <ul style="list-style-type: none"> a. Any other activity which is not provided for as a permitted, restricted discretionary or discretionary activity; b. Any activity, structure or earthworks within the National Grid Yard which does not comply with the performance standards at 3.9.10; <ul style="list-style-type: none"> i. Dairy/milking sheds or buildings (excluding associated yards) intensive farm buildings, protective canopies and commercial greenhouses. c. Any sensitive activity, including any change of use to a sensitive activity, or any building or addition to any building associated with a sensitive activity and located within the National Grid Yard; <u>and</u> d. A hazardous facility within the National Grid Yard

Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
Chapter 13 Subdivision			
<p>Rule 13.4.2.aa Restricted Discretionary Activities – Subdivision in the Rural Production Zone</p>	<p>Support in part/amend</p>	<p>Transpower supports the introduction of a rule to Chapter 13 that will regulate subdivision in the Rural Production Zone near the National Grid, as it removes repetition from the District Plan and improves clarity for plan users.</p> <p>However, Transpower seeks two amendments to the rule. The first is to clarify the scope of the subdivision rule as it relates to the National Grid, specifically to clarify that the rule applies within the National Grid Subdivision Corridor (a term that is separately defined in Chapter 2). At present the rule is not clear in scope and this amendment will improve interpretation for plan users.</p> <p>The second amendment is of an editorial nature, to improve clarity for plan users.</p>	<p>Amend Rule 13.4.2.aa as follows:</p> <p>13.4.2.aa Subdivision <i>in the Rural Production Zone</i> provided that:</p> <ul style="list-style-type: none"> i. Minimum site area is 10 hectares per allotment, except that this shall not apply to allotments required for network utility activities; ii. Complies with the subdivision provisions in Section 13.4; and iii. <u>For subdivision located within the National Grid Subdivision Corridor, the identified Building Platform shall be located outside the National Grid Yard.</u> <p>Council restricts its discretion to: The ability of sites to:</p> <ul style="list-style-type: none"> • Be independently services for stormwater and wastewater; • Comply with the subdivision provisions at Section 13.4; and • Maintain or enhance rural character and to avoid potential reverse sensitivity <p>Impact on the operation, maintenance, upgrade and development of the National Grid, including:</p> <ul style="list-style-type: none"> • Compliance with NZECP34:2001; • The location and orientation of identified Building Platforms relative to the National Grid; • The nature and location of any vegetation proposed to be planted in the vicinity of the National Grid; and • Access to the National Grid; and • <u>The risk of electrical hazards affecting public safety, and the risk of property damage.</u>

Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
Rule 13.4.2.ab Restricted Discretionary Activities – Subdivision in the Rural Production Zone	Support in part/amend	<p>Transpower supports the introduction of a rule to Chapter 13 that will regulate subdivision (of smaller lot sizes) in the Rural Production Zone near the National Grid, as it removes repetition from the District Plan and improves clarity for plan users.</p> <p>However, Transpower seeks two amendments to the rule. The first is to clarify the scope of the subdivision rule as it relates to the National Grid, specifically to clarify that the rule applies within the National Grid Subdivision Corridor (a term that is separately defined in Chapter 2). At present the rule is not clear in scope and this will improve interpretation for plan users.</p> <p>The second amendment is of an editorial nature, to ensure that omitted matters of discretion are fully incorporated from Chapter 3.</p>	<p>Amend Rule 13.4.2.ab as follows:</p> <p>13.4.2.ab Subdivision <i>in the Rural Production Zone</i> to create one allotment with a minimum site area of 5000m² and a maximum site area of one hectare site area provided that:</p> <ul style="list-style-type: none"> i. The site proposed for subdivision, legally existed at the 21st March 2016 of this rule; ii. The balance site area is at least 10 hectares; <u>and</u> iii. <u>For subdivision located within the National Grid Subdivision Corridor, the identified Building Platform shall be located outside the National Grid Yard; and</u> iv. Complies with the subdivision provisions in Section 13.4. <p>Council restricts is discretion to:</p> <ul style="list-style-type: none"> • The ability of the development to be serviced by on-site means with regard to effluent and stormwater disposal; • Impact on the rural character of the surrounding area, and to avoid potential reverse sensitivity; • Impact on the operation, maintenance, upgrade and development of the National Grid, including: <ul style="list-style-type: none"> - Compliance with NZECP34:2001; - <u>The location and orientation of identified Building Platforms relative to the National Grid;</u> - <u>The nature and location of any vegetation proposed to be planted in the vicinity of the National Grid;</u> - <u>Access to the National Grid; and</u> - <u>Risk of electrical hazards affecting public or individual safety, and the risk of property damage.</u>
Rule 13.4.2.ad Restricted Discretionary Activities –	Support in part/amend	Transpower supports the introduction of a rule to Chapter 13 that will regulate subdivision in the Rural General Zone near the National Grid,	Amend Rule 13.4.2.ad as follows:

Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
Subdivision in the Rural General Zone		<p>as it removes repetition from the District Plan and improves clarity for plan users.</p> <p>However, Transpower seeks two amendments to the rule. The first is to clarify the scope of the subdivision rule as it relates to the National Grid, specifically to clarify that the rule applies within the National Grid Subdivision Corridor (a term that is separately defined in Chapter 2). At present the rule is not clear in scope and this will improve interpretation for plan users.</p> <p>The second amendment is of an editorial nature, to improve clarity for plan users.</p>	<p>13.4.2.ad Subdivision <i>in the Rural General Zone</i> provided that:</p> <ul style="list-style-type: none"> i. The minimum site area is 1 hectare per allotment, except that this shall not apply to allotments required for network utility activities; ii. Complies with the subdivision provisions at Section 13.4; and iii. <u>For subdivision located within the National Grid Subdivision Corridor, the identified Building Platform shall be located outside the National Grid Yard.</u> <p>Council restricts its discretion to: The ability of sites to:</p> <ul style="list-style-type: none"> • Be independently serviced for stormwater and wastewater; <u>and</u> • Comply with the subdivision provisions at Section 13.4; and • Maintain or enhance rural lifestyle character. <p>Impact on the operation, maintenance, upgrade and development of the National Grid, including:</p> <ul style="list-style-type: none"> • Compliance with NZECP34:2001; • The location and orientation of identified Building Platforms relative to the National Grid; • The nature and location of any vegetation proposed to be planted in the vicinity of the National Grid; and • Access to the National Grid; <u>and</u> • <u>Risk of electrical hazards affecting public or individual safety, and the risk of property damage.</u>
13.4.4.f Non-complying Activities	Oppose/amend	Transpower supports the introduction of Rule 14.4.4.f in principle, however it considers that this rule is unclear and unnecessary due to an existing clause at Rule 13.4.4.d which is sufficient, and states: "Subdivision of land in the National Grid Subdivision Corridor where the identified building platform cannot be	Delete proposed Rule 13.4.4.f as notified and retain operative Rule 13.4.4.d.

Specific Plan Provision	Support/ Oppose/ Amendment	Reasons for Submission	Relief Sought
		located wholly outside the National Grid Yard.” The introduction of new Rule 13.4.4.f would only create confusion for plan users, as it partly replicates the operative clause.	



Legend

- Substation
- Town
- 110kV National Grid Line
- 220kV National Grid Line
- Railway
- Highway
- Whanganui District Council Boundary
- Regional Council Boundary
- Residential Area



Transpower Assets in Whanganui District

Projection: NZTM 2000 Scale: 1:280,000 Plan Size: A3P



COPYRIGHT © 2014 TRANSPOWER NEW ZEALAND LIMITED. ALL RIGHTS RESERVED
 This document is protected by copyright vested in Transpower New Zealand Limited ("Transpower"). No part of the document may be reproduced or transmitted in any form by any means including, without limitation, electronic, photocopying, recording or otherwise, without the prior written permission of Transpower. No information embodied in the documents which is not already in the public domain shall be communicated in any manner whatsoever to any third party without the prior written consent of Transpower. Any breach of the above obligations may be restrained by legal proceedings seeking remedies including injunctions, damages and costs.

Form 5**Submission on Proposed Plan Change 55: Miscellaneous 1 –
Whanganui District Council**

To: Whanganui District Council

Submission on: Plan Change 55 – Miscellaneous 1

Name of submitter: Fire and Emergency New Zealand (FENZ)

Address: c/o Beca Ltd
PO Box 3942
Wellington 6140

Attention: Alicia Todd

Phone: 04 896 0652

Email: Alicia.todd@beca.com

This is a submission on behalf of Fire and Emergency New Zealand (FENZ) on a notification by Whanganui District Council concerning proposed Plan Change 55 of the Whanganui District Plan (hereafter “PC55”).

The Fire and Emergency New Zealand Act 2017 (FENZ Act) established FENZ from 1 July 2017. FENZ was created from the previous New Zealand Fire Service Commission, the New Zealand Fire Service, the National Rural Fire Authority, and 38 other Rural Fire Authorities. The FENZ Act, among other matters, replaced the two previous governing Acts (the Fire Service Act 1975 and the Forest and Rural Fire Act 1977) to create a single, unified fire services organisation for New Zealand. The FENZ Act establishes the governance, management and operational arrangements for protecting life and property from fire and other emergencies in New Zealand.

FENZ recognises the importance of the proposed PC55 in setting the planning framework for enabling and managing future development in Whanganui.

The purpose of the Resource Management Act 1991 (RMA) is to promote the sustainable management of natural and physical resources, which includes enabling people and communities to provide for their social, economic and cultural wellbeing and for their health and safety. The risk of fire represents a potential adverse effect of low probability but high potential impact. FENZ has a responsibility under the FENZ Act to reduce the incidence of unwanted fire and the associated risk to life and property. As such, FENZ monitors changes in statutory planning documents occurring under the RMA to ensure that, where necessary, appropriate consideration is given to fire safety.

FENZ's role includes promoting fire safety and fire prevention, and extinguishing fires. PC55 provides an opportunity to better facilitate these activities, by including appropriate rules which will enable people and communities to provide for their health and safety with regard to fire safety, fire prevention, and fire extinction.

Adequate water supply and access for firefighting activities:

The provision of adequate water supply and firefighting access is critical. It is important to FENZ that any new dwelling or land use that does not have access to a reticulated water supply has access to an adequate firefighting water supply of some kind. This essential emergency supply will provide for the health, safety and wellbeing of people and the wider community, and therefore achieves the purpose of the RMA.

The New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008 (Code of Practice) is a non-mandatory New Zealand Standard that sets out the requirements for firefighting water and access. The Code of Practice enables a consistent approach throughout New Zealand and allows FENZ to operate effectively and efficiently in a fire emergency. FENZ considers that the best way to provide a consistent approach to mitigating the actual and potential effects of fire across the district (rather than just the notified applications for resource consents) is to include specific standards in district plans.

Proposed PC55 additions relevant to FENZ:

PC55 aims to remove repetition and address inconsistencies in specific chapters of the plan. This includes a proposal to enable the development of additional minor buildings on a rural site, in the Rural Production, Rural Lifestyle, Rural General, and Rural Settlement Zones. For the Rural Production Zone, the proposed provision creates a new performance standard and is:

3.5.12 Minor Residential Dwelling

- a. One minor residential unit per allotment which has a minimum net site area of 10ha.
- b. Must not exceed 60sqm in gross floor area.

Similar performance standards (with differing minimum net site area figures) numbered 3.7.10, 3.9.12, and 3.11.11 are proposed for the remaining rural zones.

Under these performance standards, the addition of a minor residential dwelling on a rural site would be a permitted activity, subject to compliance with the corresponding performance standards. As currently drafted, new minor residential dwellings in these rural zones would not be required to provide adequate water supply and access for firefighting appliances to meet FENZ's requirements. This poses a significant risk to the health, safety and wellbeing of people and communities.

FENZ seeks the following decision from the consent authority:

FENZ supports the proposed PC55 in part, subject to amendments being made. FENZ seeks that an additional requirement is added to the performance standards for all new 'minor residential dwellings'. This would require compliance with the requirements for 'structures' set out in performance standard 3.5.4 of the Whanganui District Plan. Performance standard 3.5.4(f) requires compliance with the New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008.

FENZ proposed additional performance standard could read:

- c. Must comply with the requirements for 'structures' in performance standard 3.5.4.

Alternatively, FENZ seeks that a performance standard for all new 'minor residential dwellings', to be regulated under new sections 3.5.12, 3.7.11, 3.9.13 and 3.11.12 of the District Plan be added, reading:

- a. Must provide for water supply and firefighting appliance access requirements consistent with the New Zealand Firefighting Code of Practice SNZ/PAS 4509:2008

FENZ could not gain an advantage in trade competition through this submission.

FENZ wishes to be heard in support of its submission.

If others make a similar submission FENZ will consider presenting a joint case with them at a hearing.



.....
(Signature of person authorised to sign on behalf of Fire and Emergency New Zealand)

28/01/19

.....
Date

Title and address for service of person making submission:

Fire and Emergency New Zealand
c/o Beca Ltd

Attention: Alicia Todd

Address: Beca Ltd
PO Box 3942
Wellington 6140

8 February 2019

File ref: 33002-081

Whanganui District Council
PO Box 637
Whanganui 4541

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

Dear Sir or Madam,

SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA

Proposed Plan Change 55 – Miscellaneous to the Whanganui District Plan.

TO: Whanganui District Council

FROM: Heritage New Zealand Pouhere Taonga

1. This is a submission on the following proposed plan change (the proposal):

Proposed Plan Change 55 – Miscellaneous to the Whanganui District Plan.

2. Heritage New Zealand could not gain an advantage in trade competition through this submission.

3. The specific provisions of the proposal that Heritage New Zealand's submission relates to are:

The proposed plan change Appendix A – Heritage items for Wanganui Collegiate School.

4. Heritage New Zealand's submission is:

- Heritage New Zealand Pouhere Taonga supports the change to the scheduled heritage item description for Appendix A – Heritage Items for Wanganui Collegiate School.
- In supporting the amendment, Heritage New Zealand Pouhere Taonga seeks that what is encompassed by the schedule description to be clarified in the schedule and planning map.

5. The reasons for Heritage New Zealand's position are as follows:

Heritage New Zealand Pouhere Taonga (HNZPT) is an autonomous Crown Entity with statutory responsibility under the Heritage New Zealand Pouhere Taonga Act 2014 (HNZPTA) for the identification, protection, preservation and conservation of New Zealand's historical and cultural heritage.

The protection of historic heritage from inappropriate subdivision, use, and development is a matter of national importance under section 6(f) of the Resource Management Act (RMA). Under section 74(2)(b)(iia) of the RMA, in preparing a change to the district plan, territorial authorities shall have regard to any relevant entry on the New Zealand Heritage List/ Rārangī Kōrero as required by the Heritage New Zealand Pouhere Taonga Act 2014.

The regional and local policy planning framework contains objectives and policies for historic heritage, and amongst the provisions of the Whanganui District Plan for the protection of historic heritage from inappropriate subdivision, use and development, Policy 9.3.1 directs *“Maintain and update the historic heritage appendices in the Plan and accompanying database, in an appropriate format.”*

The proposed change to Appendix A – Heritage items would include grouping the existing set of separately scheduled heritage items throughout the schedule for Wanganui Collegiate School into one schedule listing at a single point in the heritage appendix.

Wanganui Collegiate School was entered onto the New Zealand Heritage List/ Rārangī Kōrero in 2016 with a Category 1 historic place listing. The list entry updated the previous set of separate listings at the school site. It resulted in a consolidated and single list entry with an extent (or boundary) to recognise the school site as a whole and its historic heritage values.

The List entry extent covers land contained within Liverpool Street, Grey Street, London Street, Glasgow Street and the railway line. It recognises that some buildings and structures within the boundary of the place are particularly noted for their high architectural and/or social and historical heritage values and others are of considered to be of limited heritage significance. All of the buildings and features within the school grounds collectively contribute to the heritage significance of Wanganui Collegiate School.

The Heritage New Zealand List entry number and category 1 listing is included in the proposed change and supported by a District Plan Class A Group listing. However, the proposed schedule description, in relation to the name and location is limited, for example the address is proposed as 132 Liverpool Street only. No associated changes are proposed to the planning map to reflect the change to the schedule, either in relation to the heritage item symbol and/or the boundary of the heritage precinct.

The proposed change would provide for a more consolidated and comprehensive listing although it should be further amended to be clear in relation to the full the extent of the land, buildings, and features or structures which fall under the scheduled heritage item, and therefore afforded protection under the District Plan. This would assist, in applying the Plan rules, for example, 9.4.3 Discretionary Activities – b. Erection of new structures or removal of structures in a Class A Group area other than a specifically listed Class A structure. Further change would also provide more consistency between the schedule and the planning maps.

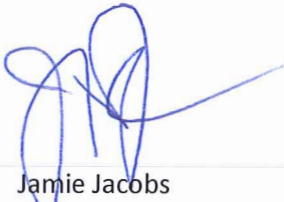
6. Heritage New Zealand seeks the following decision from the local authority:

Support and retain the changes to Appendix A – Heritage Items to consolidate the listing for Wanganui Collegiate School, subject to making the following amendments or similar change to give effect to the relief sought:

- Amend the proposed schedule description for Wanganui Collegiate School by making changes to one or more parts of the schedule description (including name and location), to make it clear what is encompassed in the heritage item, including the extent.
- Make consequential changes to the identification of the heritage item on the associated planning map to clarify the definition and extent of the scheduled heritage item, including through mapping the extent of the heritage item.

7. Heritage New Zealand wishes to be heard in support of our submission.

Yours sincerely



Jamie Jacobs
Director, Central Region

Address for service

Heritage New Zealand Pouhere Taonga
Central Region
PO Box 2629
Wellington 6140
Ph: 04 494-8325
Email: crachlin@heritage.org.nz
Contact person: Caroline Rachlin, Planner

8 February 2019

Whanganui District Council
PO Box 637
WHANGANUI 4540

File ref: RAI 04 07
SC:PAT

Private Bag 11025
Manawatu Mail Centre
Palmerston North 4442

P 06 952 2800
F 06 952 2929

www.horizons.govt.nz

Attn: Hester den Ouden

Dear Hester

HORIZONS REGIONAL COUNCIL SUBMISSION – PROPOSED PLAN CHANGE 55

Thank you for the opportunity to make a submission on Whanganui District Council's (WDC) Proposed Plan Change 55 (PPC55). Horizons Regional Council (Horizons) Horizons could not gain an advantage in trade competition through this submission.

The following submission focuses on 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).

Horizons generally supports the overall aim of PPC55, to improve the clarity of the District Plan by addressing a number of relatively minor matters. However, we have some concerns regarding the proposed amendments to the Rural Zones provisions, to allow minor residential dwellings as a permitted activity.

We acknowledge that the current provisions are potentially ambiguous – some of the rules permit all residential activities and at the same time permit only one dwelling, for example – and are inconsistent with the approach in the Residential Zone. However, Horizons does not agree that the adverse effects on the environment are the same in the Rural Zones as the Residential, principally because of the potential impact of an additional dwelling on on-site wastewater servicing. We consider that these rules do not give effect to District Plan Policies 3.2.8 (Rural Lifestyle Zone) and 3.2.12 (Rural Settlement Zone), which state:

Water, wastewater and stormwater services are contained onsite and sustainably managed to avoid any environmental effect beyond the site.

WDC appears to be relying on the One Plan (and, we understand from discussions between officers, the Building Act requirements) to achieve these policies. Although plan users are alerted to the need to meet One Plan rules for existing and new discharges of domestic wastewater in a note, permitted activity status with no condition or standard that requires consideration of the increase in volume sets up an expectation of development. In practice, if the increased discharge cannot meet One Plan Rule 14-14, a consent may be required from Horizons under restricted discretionary Rule 14-15; there is no guarantee that such a consent would be granted.

Kairanga

Marton

Palmerston North

Taihape

Taumarunui

Wanganui

Woodville

Horizons therefore seeks amendments to enable WDC to manage the potential impact of increases to the domestic wastewater system. We suggest the following options in the first instance:

- i. Add a performance standard to 3.5.12, 3.7.10, 3.9.12 and 3.11.11 requiring that wastewater from the minor dwelling must be able to be serviced on-site; or
- ii. Delete proposed performance standards 3.5.12, 3.7.10, 3.9.12 and 3.11.11, and insert “the ability of minor dwellings to be independently serviced for wastewater” as a matter over which discretion is restricted in Rules 3.4.2 a., 3.6.2 a., 3.8.2 a. and 3.10.2 a. At the same time, clarify that the permitted activities in the Rural Zone do not include minor dwellings; or
- iii. Any further, alternative, or consequential relief to address the matters raised in this submission.

Horizons would like to be heard in relation to its submission, and would be willing to consider presenting a joint case if there are others making similar points.

Please do not hesitate to contact the Coordinator District Advice (email: sarah.carswell@horizons.govt.nz) if you would like to discuss or clarify any aspect of this submission.

Yours sincerely



Sarah Carswell
COORDINATOR DISTRICT ADVICE



**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) Montgomery Reserve Group

This is a submission on Plan Change No. 55 to the Whanganui District Plan.
Closing Date: 8 February 2019

- 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:

Montgomery Reserve Rezoning

(Use additional pages if required)

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

- (a) Support the provisions as stated
 - (b) Seek additional amendment
- see attached statement

(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):

include adjacent reserve land in rezoning
see attached

(Use additional pages if required)

Statement

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:

70 Karaka Street
Wanganui

Signature: R.D. Shand
(Rogor Shand)

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

Day time phone No: 021 0574189

Email: r.d.shand@gmail.com

Date: 8/2/19

IN THE MATTER OF PLAN CHANGE 55:

Rezoning existing Residential land to Reserves and Open Spaces

Submission Statement for Montgomery Reserve Group

We support the proposed change of Residential Land (purple bounded in upper figure and area A in lower figure in attached map) and agree with the Section 32 reasoning: "That the proposed rezoning would ensure that the whole of this large reserve has a consistent management regime"

However, as can be seen on the attached aerial map, this large reserve in fact also comprises 3 other parcels of land that we have marked B, C and D. These parcels comprise "stopped road" and have always been used as reserve

According to LINZ, Area B was formally acquired as a recreation ground in 1972 and area C in 1989.

We seek additional rezoning from Residential to Reserves and Open Spaces for the remaining areas B, C and D on the following grounds:

- To ensure the entire currently used, and council designated¹, Montgomery Recreation Area is consistently zoned;
- To ensure that rezoning does not result in a small pocket of isolated residential land, and
- To ensure the entire current Montgomery Recreation Area is protected from future residential development which would compromise the value of the reserve

It is not clear from the Section 32 report on the Plan Change 55 whether this additional land was considered or overlooked for rezoning.

1. *At its meeting on 25/26 August 2015 the Council decided that it would rescind all previous resolutions to sell part of the Montgomery Reserve and retain the whole area as a passive reserve.* Letter to Montgomery Reserves Group 14-9-2016 from Mr Jonathan Barrett, Senior Planner, Whanganui District Council

