

Comments on applications for referral under the COVID-19 Recovery (Fast-track Consenting) Act 2020

This form is for local authorities to provide comments to the Minister for the Environment on an application to refer a project to an expert consenting panel under the COVID-19 Recovery (Fast-track Consenting) Act 2020.

Local authority providing comment	Horizons Regional Council
Contact person (if follow-up is required)	Greg Bevin – Regulatory Managers s 9(2)(a)
	Jasmine Mitchell – Team Leader Consents s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Alabaster Residential Development at Aramoho, Whanganui PJ-0000885
General comment – potential benefits	The potential benefits of the project are associated with the provision of 176 residential allotments. The construction of the infrastructure will generate jobs and provide for residential properties.
General comment – significant issues	<p>The significant issues with the project include:</p> <ul style="list-style-type: none"> - Potential impact on the values set out within Te Awa Tupua (Whanganui River Claims Settlement Act 2017); - Effects associated with earthwork and potential sediment loss; - Potential effects on water quality and capacity of the existing water courses; and - Effects associated with the ecological impact of the proposal including the diversion and potential reclamation of the stream beds through the site.
Is Fast-track appropriate?	Horizons view on this matter is relatively neutral.
Environmental compliance history	This company has no compliance history with Horizons Regional Council.
Reports and assessments normally required	<p>The reports / assessments that would be expected for a development of this scale are as described below:</p> <ul style="list-style-type: none"> - An appropriate process undertaken under Te Awa Tupua which details how the project has particular regard to the Te Awa Tupua status and Tupua te Kawa. This process would need to involve the input of both the local iwi and hapū and is an important step to ensure an appropriate process is followed; - In addition to the above assessment, a cultural values assessment may be required from individual hapū to identify any specific values; - A detailed assessment identifying the existing water courses / unnamed tributaries and their existing ecological values. The assessment would identify any habitat loss through any diversions or reclamations. In addition, the assessment would undertake an assessment of the effects against the effects management hierarchy set under the National Policy Statement for Freshwater Management. If there is any habitat loss it is

	<p>expected that any proposed offsetting or compensation would be modelled and calculations provided within this assessment and identification of any offsetting areas;</p> <ul style="list-style-type: none"> - A comprehensive earthworks and erosion and sediment control plan prepared by a suitably qualified and experienced person in accordance with the document titled 'Erosion and Sediment Control Guidelines for the Greater Wellington Region'; - An archaeological assessment or management plan for any accidental discovery. This may be included within a construction management plan; - An assessment from a suitably qualified and experienced person on the impact of stormwater runoff into the existing water courses in terms of impact on the quality and hydraulic capacity of the existing streams to accommodate any changes from the proposed development. This should also include details on the proposed culverts including the proposed stormwater pipes and the impact of the details; - An assessment of the stormwater detention ponds and structural integrity of the proposed bunded detention pond (s) and impact on the water courses; - Given the proposed land use change, an assessment on potentially contaminated land and if the proposed works may result in potential consents under the Regional Plan; - A comprehensive planning assessment including an assessment against the relevant objectives and policies of the Regional Plan, Regional Policy Statement and relevant statutory documents; and - A draft set of consent conditions to manage the potential effects.
Iwi and iwi authorities	<p>The site is located within the Whanganui Catchment. The works have the potential impact on Te Awa Tupua (Whanganui River Claims Settlement Act 2017) and as such in addition to iwi/hapū being involved as a minimum the following parties should be contacted:</p> <ul style="list-style-type: none"> - Ngā Tangata Tiaki o Whanganui*; - Te Runanga o Tupoho; - Nga Paerangi; - Te Ao Hou Marae. <p>*These parties may advise additional hapū involvement to ensure the appropriate process and hapū are involved with the consent process.</p>
Relationship agreements under the RMA	n/a
Insert responses to other specific requests in the Minister's letter (if applicable)	N/a
Other considerations	n/a

Note: All comments, including your name and contact details, will be made available to the public and the applicant either in response to an Official Information Act request or as part of the Ministry's proactive release of information. Please advise if you object to the release of any information contained in your comments, including your name and contact details. You have the right to request access to or to correct any personal information you supply to the Ministry.

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Local authority providing comment	Whanganui District Council
Contact person (if follow-up is required)	Justin Walters
	Principal Policy Planner
	s 9(2)(a)

Comment form

Please use the table below to comment on the application.

Project name	Alabaster Residential Development
General comment – potential benefits	<p>At a district level fast tracking this project is not considered to create significant positive benefits. Currently there are approximately 870 consented residential lots which equates to 4.8 years supply. Currently the Whanganui construction sector has the capacity to undertake approximately new build dwellings 160-180pa (based on rolling average for building consents).</p> <p>While this project will create potential benefit around additional housing supply and the economy (through construction), these are likely to be only displaced from other areas of the urban environment, rather than through the creation of additional benefits.</p>
General comment – significant issues	<p>Wastewater network capacity – There are significant known downstream wastewater network capacity constraints. Council is in the process of developing a plan to manage the impacts of development within the existing residentially zoned land and an expansion to the residential zone will further exacerbate these impacts. These effects are unlikely to be adequately resolved within the constraints of the fast-track consent process.</p> <p>Adjacent development – This project has the potential to have significant implications for the development of adjacent sites to the east, including Ngaurukehu Block and land along the western side of Delhi Avenue. It is important that development of the subject land does not compromise the future development potential of this neighbouring land through, for example, not providing appropriate connectivity.</p> <p>Unknown cultural value impacts - Te Runanga o Tupoho and Ngaa Rauru Kaitahi objected to the two previous rezoning plan changes that sought to expand the Whanganui urban boundary (Plan Change 53 – Springvale Structure Plan and Plan Change 46 – Otamatea West) on the basis of impacting culturally significant land (like the subject land neither area included any designated sites of cultural significance). The formal views of iwi should be sought. Cultural value impacts are unknown at this time.</p> <p>Te Awa Tupua Act 2017 – The land includes watercourses that flow intermittently to the Whanganui River. Te Awa Tupua is likely to be an affected party and the formal views of Nga Tangata Tiaki o Whanganui must be sought. Cultural value impacts on Te Awa Tupua are unknown at this time.</p>

Is Fast-track appropriate?	<p>A fast-track process is not considered appropriate for the following reasons:</p> <ul style="list-style-type: none"> the land is not currently identified as an urban growth area; consenting a housing density not contemplated by the underlying zone would significantly undermine the integrity of the Whanganui District Plan; landscape character effects are more than minor, triggering public notice requirement consenting housing development at the intensity and scale proposed without the benefit of a structure plan for the wider (rural living zoned) area, comprising land held in multiple ownership, is ad hoc and piecemeal, failing to achieve a well functioning urban environment as required by the NPS UD 2020; there are known downstream wastewater network constraints that the development will exacerbate; the project delivers relatively limited economic benefits in the regional context; and there are sufficient consented residential lots to cater for over four years of residential growth such that undertaking this proposal under a fast-track process is not required.
Environmental compliance history	No known issues at the district level. Recommend seeking advice from Horizons on regional compliance history.
Reports and assessments normally required	<p>Based on a project of this scale and given the extent of encroachment into rural zoned land, Council would expect the following from the proponent with likely peer reviews to be sought as appropriate:</p> <ul style="list-style-type: none"> District level residential demand and supply analysis Landscape character assessment Urban design assessment Geotechnical assessment Contamination assessment (PSI) Servicing and impact on Council network <ul style="list-style-type: none"> Water supply Stormwater Wastewater Transport and Roading Cultural impact assessments Archaeology assessment
Iwi and iwi authorities	<p>Te Runanga o Tupoho</p> <p>Nga Tangata Tiaki o Whanganui (Te Awa Tupua Act 2017)</p>
Relationship agreements under the RMA	MOU – Te Runanga o Tupoho
Insert responses to other specific requests in the Minister's letter (if applicable)	<p>1. Are there any reasons that you consider it more appropriate for the project, or part of the project, to proceed through existing Resource Management Act 1991 (RMA) consenting processes rather than the processes in the FTCA?</p> <p>A structure plan informed plan change (rezoning) process encompassing the wider area with a resource consenting pathway for the existing residentially zoned portion of the land (Stage 1) are the most appropriate pathways.</p> <p>A strategic structure planned approach encompassing the wider area would allow development to be brought forward in a coordinated, integrated, holistic and orderly way. It would achieve a more integrated land use planning outcome and greater functioning urban environment than fast track consenting a subdivision in isolation.</p>

	<p>A consent application for the stage 1 development (existing General Residential Zone land) could potentially be processed on a non-notified basis, progressed in a timely manner, consistent with other residential greenfield developments of similar scale processed by the Council in recent years.</p> <p>2. Does the applicant, or a company owned by the applicant, have any environmental regulatory compliance history in your district?</p> <p>No known issues related to compliance at the district level.</p> <p>3. How does the project align with urban growth planning in your district?</p> <p>This project does not align with the urban growth planning for the district. The current approach to urban growth planning in the Whanganui District Plan is to focus growth within the existing urban boundary on residentially zoned land, noting two Council-led structure planning informed rezonings have recently extended the urban boundary freeing up considerable greenfield land for future residential subdivision. Based on current predictions, the Whanganui population is expected to increase between 6,000 and 9,000 by 2053 which can be accommodated by the existing supply of residential zoned land.</p> <p>4. How does the project align with the National Policy Statement for Highly Productive Land 2022?</p> <p>The project is not inconsistent with the NPS-HPL as while parts of the site proposed for residential development are LUC 2, the land is not zoned General Rural or Rural Production. The application, at section 4.1.1, contends that the land meets the exemption at 3.10(1)(a) of the NPS-HPL. This threshold test is not relevant as the land is, for the reason above, not highly productive land as defined in the NPS-HPL.</p>
Other considerations	None

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