

# **Submissions on Welhom Developments Limited Private Plan Change**

Prepared for  
Masterton District Council

By  
4Sight Consulting Limited  
Part of SLR

October 2022

## List of Submitters and Addresses for Service

| Submissions Received Within Statutory Timeframe |  |  |                    |                             |
|---|--|--|--------------------|-----------------------------|
| Submitter number                                | Submitter name                             | Address for service  | Wishes to be heard | Would consider a joint case |
| 01  | John & Kate Remfry                         | 64A Herbert Street, Masterton 5810<br>(jkr1984@xtra.co.nz)   | Yes                | Yes                         |
| 02  | Kevin Lionel & Treacy Marie Galbraith      | 247A State Highway 2, RDII Masterton<br>(kevin.gal@xtra.co.nz)   | Yes                | Yes                         |
| 03  | Debbie van Zyl                             | 16A Roger Renall Avenue, Masterton 5810<br>(jdvz@xtra.co.nz)   | No                 | Yes                         |
| 04  | Greater Wellington Regional Council (GWRC) | mika.zollner@gw.govt.nz  | Yes                | Yes                         |
| 05  | Bryce & Emma Keane                         | 1 Cashmere Oaks Drive, Lansdowne, Masterton 5810<br>(bwkeane@hotmail.co.nz)  | Yes                | Yes                         |
| 06  | Heather May & John Carl Sexton             | PO Box 599, Masterton 5840<br>(john@sexton.co.nz)  | Yes                | Yes                         |
| 07  | Albert Edward (Ted) Taylor                 | 3 Sir Herbert Hart Avenue, Lansdowne, Masterton 5810<br>(ted@taybiz.co.nz)   | Yes                | Not stated                  |
| 08  | Wayne Skipage                              | 12 Coralie Place, Lansdowne, Masterton 5810<br>(w.skipage@xtra.co.nz)  | Yes                | Yes                         |
| 09  | Shane Hart                                 | 11 McDonald Way, Lansdowne, Masterton 5810<br>(shanehart1989@outlook.com)  | Yes                | Yes                         |
| 10  | Waka Kotahi NZ Transport Agency            | Level 7, Majestic Centre, 100 Willis Street, Wellington<br>( <a href="mailto:kathryn.stamand@nzta.govt.nz">kathryn.stamand@nzta.govt.nz</a> & <a href="mailto:environmentalplanning@nzta.govt.nz">environmentalplanning@nzta.govt.nz</a> ) | Yes                | Yes                         |

# Form 5 Submission on notified proposal for policy statement or plan, change or variation

[Clause 6](#) of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: John and Kate Remfry

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

I ~~could~~ could not\* gain an advantage in trade competition through this submission.

\**Select one*

The specific provisions of the proposal that my submission relates to are:

The entirety of the Welhom Developments Ltd Private Plan Change

My submission is:

We are in receipt of the planning documents for the above scheme and would like to make the following submission.

There are three main things that need to be considered.

1. The proposal to use the Cashmere Oaks entrance will substantially increase the traffic load particularly for those residents who have purchased and will be living on the new part of the Cashmere subdivision. I am sure that when they purchased they no doubt thought that this would not be the case.
2. We would hope that the council would significantly improve the entry to Cashmere Oaks to take into account the vastly increased number of elderly residents who would be turning right onto SH2 to go to town.

I would suggest that at the very least the current 30 zone be extended and maybe lights or a roundabout considered. This of course is purely for the safety of residents and road users.

3. Alternatively, can the retirement village not have its own entry point from SH2, which would seem to us to be a far better solution bearing in mind the number of dwelling's to be built and the disruption of hundreds of heavy vehicles passing residents homes over a period of many years. Maybe a temporary access during the building phase could be

considered so that Cashmere residents are not bothered for years of heavy vehicles passing their homes.

I seek the following decision from the local authority:

- We would hope that the council would significantly improve the entry to Cashmere Oaks to take into account the vastly increased number of elderly residents who would be turning right onto SH2 to go to town.
- I would suggest that at the very least the current 30 zone be extended and maybe lights or a roundabout considered. This of course is purely for the safety of residents and road users.
- Alternatively, can the retirement village not have its own entry point from SH2, which would seem to us to be a far better solution bearing in mind the number of dwelling's to be built and the disruption of hundreds of heavy vehicles passing residents homes over a period of many years. Maybe a temporary access during the building phase could be considered so that Cashmere residents are not bothered for years of heavy vehicles passing their homes.

I wish/~~do not wish~~† to be heard in support of my submission.

†*Select one*

\*If others make a similar submission, I will consider presenting a joint case with them at a hearing. *Yes*

*\*Delete if you would not consider presenting a joint case*

Signature of submitter

*(or person authorised to sign on behalf of submitter)*

Date

31 August 2022

Electronic address for service of submitter: [jkr1984@xtra.co.nz](mailto:jkr1984@xtra.co.nz)

Telephone: 021 656 450

Postal address: 64A Herbert Street, Masterton 5810

Contact person: John and Kate Remfry

Form 5 Submission on notified proposal for policy statement or plan,  
change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: [full name] Kevin Lionel Galbraith  
Treaug Marie Galbraith

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

I ~~could~~/could not\* gain an advantage in trade competition through this submission.

\*Select one

\*I am/~~am not~~ directly affected by an effect of the subject matter of the submission that—

- (a) adversely affects the environment; and  
(b) ~~does not relate to trade competition or the effects of trade competition.~~

\*Delete entire paragraph if you could not gain an advantage in trade competition through this submission

†Select one

The specific provisions of the proposal that my submission relates to are:

[give details] The height of the buildings allowed alongside our boundary fence is our main concern and the 3 metre distance from our boundary.

My submission is:

[include—

- whether you support or oppose the specific provisions or wish to have them amended; and
- reasons for your views] amend building heights on boundaries to single storey.

I seek the following decision from the local authority:

[give precise details] to amend the allowable height of any buildings on boundary lines so as not to adversely affect the neighbouring lifestyles ie We bought our land to live rurally, we dont want to live next to tall buildings.

I wish/~~do not wish~~ to be heard in support of my submission.

†Select one

\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.

\*Delete if you would not consider presenting a joint case

Signature of submitter *Kevin Galbraith*  
(or person authorised to sign on behalf of submitter)

Date *21/9/2022*

(A signature is not required if you make your submission by electronic means)

Electronic address for service of submitter: *Kevin.gal@xtra.co.nz*

Telephone: *0274589993*

Postal address (or alternative method of service under section 352 of the Act):

Contact person: [name and designation, if applicable]

*Kevin Galbraith*  
*247A State Highway 2 RD11 Masterton*

**Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by clause 6(4) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.



# Form 5 Submission on notified proposal for policy statement or plan, change or variation

*Clause 6 of Schedule 1, Resource Management Act 1991*

To Masterton District Council

Name of submitter: Debbie van Zyl

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

I ~~could~~/could not\* gain an advantage in trade competition through this submission.

\*Select one

~~\*I am/am not† directly affected by an effect of the subject matter of the submission that—~~

~~(a) adversely affects the environment; and~~

~~(b) does not relate to trade competition or the effects of trade competition.~~

~~\*Delete entire paragraph if you could not gain an advantage in trade competition through this submission~~

†Select one

The specific provisions of the proposal that my submission relates to are:

- Use by the proposed development of the existing roading through Cashmere Oaks and specifically Cashmere Oaks Drive.
- Proposed lot size

My submission is:

I oppose the private plan change application (including the proposed use of the existing Cashmere Oaks subdivision roading).

Cashmere Oak subdivision is a sought-after subdivision and part of that attraction is that it is partly surrounded by rural land and not high-density housing. By rezoning the land to residential with the size of the proposed lots of 400 m<sup>2</sup> it will severely detract from the value of the existing Cashmere Oaks subdivision properties – most (if not all) of which houses are now worth well over

a \$1,000,000 - and will therefore invariably detrimentally affect the current resident of Cashmere Oaks financially.

It will be extremely dangerous to use the existing Cashmere Oaks Drive as the gateway to the new proposed development. It is already dangerous to exit Cashmere Drive with the speed limit at 100km/h. While the notification bundle (regarding the plan change) indicated that no accidents have happened yet, this is not factually correct as there have been some accidents (with luck so far just minor ones) and is just a case of a serious accident waiting to happen with the situation as is.

Currently, especially over weekends and early in the morning, one can already wait up to eight minutes before you can safely turn right (south) to go into Masterton from Cashmere Oaks Drive, and this is with the current number of residents of Cashmere Oaks to date. It will even be worse when the next stage of Cashmere Oaks (currently under construction) opens. If you then add another additional two hundred plus houses as planned by the Private Plan Change to the mix, you will not be able to enter or exit Cashmere Oaks Drive safely without the speed reduction to 50 km/h as previously mentioned plus either a roundabout or traffic lights to safeguard everyone.

Therefore, if the 50km zone is not extended on State Highway 2 out of Masterton until north past the Welcome to Masterton sign and a dedicated left-hand entrance lane to enter Cashmere Oaks Drive is not created to turn into Cashmere Oaks Drive from the south driving north, I believe that it will endanger the lives of all those who live in Cashmere Oaks if the Proposed Plan Change is effected without these safeguards.

I seek the following decision from the local authority:

To decline the application and as an alternative:

- The Council should work with Waka Kotahi to extend the speed limit of 50km/h on State Highway 2 north past the Welcome to Masterton sign (north of Hansell's and the Arvida Lansdowne Park extension). For avoidance of doubt, if driving south on State Highway 2 into Masterton, the 50 km speed limit zone should start from the existing Welcome to Masterton sign that is situated north of the Arvida Lansdowne Park extension.
- A dedicated left-hand lane (if you are driving north out of Masterton) should be created to enter Cashmere Oaks Drive. Currently when one is driving north out of town you get tailgated by drivers behind you that want to drive 100km an hour and 99% of those people will pass you on the right-hand side, notwithstanding the double yellow line. This is extremely dangerous for anybody wanting to exit Cashmere Oaks Drive turning south into town as they can only see the vehicle wanting to enter Cashmere Oaks Drive and not necessarily see any vehicles behind that vehicle. This means that a driver might therefore deem it safe to turn right (south) out of Cashmere Oaks Drive towards Masterton if they see the upcoming vehicle driving north is turning into Cashmere Oaks Drive - they will then invariably meet the tailgating vehicle (passing illegally over the double yellow line driving north) head on. The notification bundle states that there is no place to make a dedicated left-hand turning lane into Cashmere Oaks when driving north, but the drainage ditch could be piped and closed over to create a dedicated left-hand lane for entrance into Cashmere Oaks. The best alternative to a dedicated left-hand lane, apart from the speed zone reduction, would be (a) a roundabout or (b) traffic lights or (c) that the proposed rezoned Site (pursuant to the Private Plan Change) has its own separate entranceway separate from Cashmere Oaks' roading.



- Lot sizes should be a minimum of 800 m<sup>2</sup> so that it does not detrimentally affect the registered owners of land at Cashmere Oaks financially.

I ~~wish~~/do not wish† to be heard in support of my submission.

†*Select one*

\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.

*\*Delete if you would not consider presenting a joint case*



Signature of submitter

Date: 27 September 2022

*(A signature is not required if you make your submission by electronic means)*

Electronic address for service of submitter: [jdvz@xtra.co.nz](mailto:jdvz@xtra.co.nz)

Telephone: 0274801244

Postal address (or alternative method of service under [section 352](#) of the Act): 16A Roger Renall Ave, Masterton, 5810

Contact person: Debbie van Zyl

### **Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:

- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

# Form 5 Submission on notified proposal for policy statement or plan, change or variation

[Clause 6](#) of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: *Greater Wellington Regional Council*

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

I *could not*\* gain an advantage in trade competition through this submission.

The specific provisions of the proposal that my submission relates to are:

- *See attached submission table*

My submission is:

- *See attached submission table*

I seek the following decision from the local authority:

- *See attached submission table*

I *wish* to be heard in support of my submission.

\*If others make a similar submission, *I will* consider presenting a joint case with them at a hearing.

Signature of submitter

*(or person authorised to sign on behalf of submitter)*

Date

*(A signature is not required if you make your submission by electronic means)*

Electronic address for service of submitter: [mika.zollner@gw.govt.nz](mailto:mika.zollner@gw.govt.nz)

Telephone: 02 12267336

Postal address (or alternative method of service under [section 352](#) of the Act):  
[mika.zollner@gw.govt.nz](mailto:mika.zollner@gw.govt.nz)

Contact person: *Mika Zollner*

### **Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## Greater Wellington Submission on Masterton District Council Welhom Developments Limited Private Plan Change

| Provision / matter | Position               | Reason for submission   | Decisions requested / relief sought  |
|--------------------|------------------------|---|--|
| Whole Plan Change  | Support with amendment | <p>The proposed plan change must have regard to Proposed RPS Change 1, which includes new direction on climate change, freshwater, indigenous ecosystems and urban development.</p> <p>Greater Wellington supports the intention to provide more housing to the Masterton District and to consider housing choice by providing a retirement village.</p> <p>Greater Wellington seeks for the proposed plan change to have regard to the provisions in Proposed RPS Change 1, particularly Objective 22 which articulates the qualities and characteristics of well-functioning urban environments.</p>  | <p>Ensure the plan change provisions have regard to the qualities and characteristics of well-functioning urban environments as articulated in Objective 22 of Proposed RPS Change 1, by including necessary objectives, policies, permitted standards and rules that provide for these qualities and characteristics.</p> <p>Ensure the plan change provisions and development have regard to Proposed RPS Change 1 policies 55, UD.3 and 57 as required.</p> |
| Whole Plan Change  | Oppose                 | <p>The intention to provide access through the existing Cashmere Oaks development is likely to cause the development to be poorly connected to SH2 and Masterton town centre. The Integrated Transport Assessment also recognises that the uptake of cycling, pedestrian activity and public transport is likely to be low for future residents.</p> <p>Greater Wellington does not consider the current approach to connecting the development to the town centre to have regard to Proposed RPS Change 1 direction on climate change emissions, ensuring transport infrastructure is in place ahead of development, and providing for multi-modal transport networks.</p> | <p>Provide for greater multi-modal links through the development to ensure options other than driving are available to future residents, and consider whether this development will provide for good connections to Masterton town centre.</p>   |
| Whole Plan Change  | Oppose                 | <p>Greater Wellington notes that the proposed private plan change is located on LUC (Land Use Capability) Class 3 land currently zoned rural. This subdivision is not in a future development area in the Operative District Plan.</p> <p>The applicant's transport assessment refers to a 2019 Masterton Urban</p>   | <p>Once the NPS-HPL comes into force on 17 October, give effect to clause 3.6(4) of the NPS-HPL, by assessing whether this private plan change meets all criteria for urban re-zoning of highly productive land to be allowed.</p>   |

| Provision / matter | Position | Reason for submission   | Decisions requested / relief sought |
|--------------------|----------|---|-------------------------------------|
|                    |          | <p>Growth Strategy which appears to have identified the site as a 'potential future urban expansion area'. Greater Wellington understands that this strategy was not adopted or published by Masterton District Council, and therefore is not considered to meet the definition of 'identified for future urban development'.</p> <p>Consideration should be given to direction provided by the National Policy Statement for Highly Productive Land 2022 (NPS-HPL) when it comes into force. As the site has not been identified for future urban development, the direction to avoid urban zoning in rural land with LUC classes of 1, 2 or 3 until the Regional Policy Statement has mapped highly productive land applies, in accordance with clause 3.6.</p> |                                     |

# Form 5 Submission on notified proposal for policy statement or plan, change or variation

[Clause 6](#) of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: Bryce and Emma Keane

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

I ~~could~~ could not\* gain an advantage in trade competition through this submission.

\*Select one

The specific provisions of the proposal that my submission relates to are:

Submission relates to the entirety of the plan change.

My submission is:

Support in part / oppose in part.

Submission relates to the proposed entrance to the site and other concerns, including:

- \* Proposed amount, land size and availability of the sections (target market outside of elderly/retirement village)
- \* Potential re-zone of flat farmable land
- \* Lack of infrastructure - Water pressure in Cashmere Oaks is already in dire need of a water pumping station
- \* Not looking to re zone land between development and the state highway

I seek the following decision from the local authority:

Grant the plan change with conditions.

I wish/~~do not wish~~ to be heard in support of my submission.



† *Select one*

\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.

*\*Delete if you would not consider presenting a joint case*

Signature of submitter

*(or person authorised to sign on behalf of submitter)*

Date 28/09/2022

*(A signature is not required if you make your submission by electronic means)*

Electronic address for service of submitter: [bwkeane@hotmail.co.nz](mailto:bwkeane@hotmail.co.nz)

Telephone: 0272 480 971

Postal address (or alternative method of service under [section 352](#) of the Act):

1 Cashmere Oaks Drive, Lansdowne, Masterton 5810

Contact person: Bryce Keane

### **Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

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- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
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Form 5 Submission on notified proposal for policy statement or plan,  
change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: Heather May SEXTON & John Carl SEXTON

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

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

The specific provisions of the proposal that our submission relates to are:

As per the attached statement

Our submission is:

As per the attached statement

We seek the following decision from the local authority:

As per attached statement

We wish to be heard in support of our submission.

\*If others make a similar submission, we will consider presenting a joint case with them at a hearing.

  
Signature of submitter

Date

28/9/2022

(A signature is not required if you make your submission by electronic means)

Electronic address for service of submitter: [john@sexton.co.nz](mailto:john@sexton.co.nz)

Telephone: 021 741 850

Postal address (or alternative method of service under [section 352](#) of the Act):

PO Box 599

Masterton 5840

Contact person: [*name and designation, if applicable*] John Sexton

### **Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

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- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

## **Submission of Heather May SEXTON and John Carl SEXTON**

**On the**

**Welhom Developments Limited private plan change proposal to the operative Wairarapa Combined District Plan (2011).**

We have no issue with the proposal *per se* but have specific concerns relating to the following aspects of the proposal:

**Masterton Plan Change Request Document** – is the document referenced in our submission.

**3.2 Site Description** –The application states that access to the site will be through the Cashmere Oaks subdivision.

The site description includes Lot 36 DP 429991, which is a small piece of land subject to several right of way easements.

While we understand from discussion with the applicants' representatives that it is not intended that the land subject to the rezoning application will have the use of (or be granted an easement) over Lot 36 – it is currently the main access to the land to which the application relates.

We submit that any consent to a change of land classification as proposed should be conditional on alternate access being made available and that it should also be conditional on no further easements being granted over Lot 36, to provide access to the land being rezoned.

**4.1 Proposed Changes** - Applying the existing District Plan rules and standards to this site may be inappropriate. The developer of the Cashmere Oaks subdivision has been careful to establish a premium subdivision – wide streets, footpaths on both sides of the roadway, wide berm and planting. The developer has also been thoughtful in terms of covenants (building, fencing etc) relating to the subdivision.

We submit that any approval to extend the Cashmere Oaks subdivision (including the retirement village) should be subject to the same type and style of development as the current subdivision.

This shouldn't be an issue for the applicant, as they are currently promoting 'Summerset Masterton' as their ".....first village in the Wairarapa and will be accessed via the premium, existing Cashmere Oaks subdivision....."

**4.2 Resultant Development Form** - We are concerned as to section sizes and building heights. The application specifically refers to a mix of one and two storey standalone dwellings – maximum height of up to 10m on a typical lot size of 400m<sup>2</sup>. Under 5.1 the application refers to the minimum lot size of 350m<sup>2</sup> with an average lot size of 400m<sup>2</sup>. While we do not know the existing Cashmere Oaks subdivision average lot size, it will be considerable more than 400m<sup>2</sup>.

The application also contains a request to accommodate a higher building height of up to 14m. We understand from the applicants representatives that this will be a building used primarily for rest-home and hospital care.

Apart from Arvida Lansdowne Park other retirement villages and care facilities in Masterton are single storey.

We note that when the new local Hospital (Te Ore Ore Road, Masterton) was built in 2005, they went from a multi-level building to a single level building.

We submit

- Given the land area of the proposed site all retirement village buildings, including the rest-home and hospital should be single storey.
- Section sizes and covenants should follow those existing for the current Cashmere Oaks subdivision.

**5.1 Landscape and Visual Amenity Effects** – comment on the baseline visibility of the site contains the following statement under:

*b. Private locations – open to no views of the site from dwellings located to the north, east and south of the site.....*

We are uncertain as to how to interpret this statement as we (and neighbouring properties) currently have views of much of the proposed retirement village site from several rooms in our home, including the main living areas.

It is disingenuous to suggest that there is any relevant comparison between the current rural zoning “.....that within the rural zone some buildings of up to 15m in height can already be constructed as a permitted activity.....” and the proposed multi-storey retirement village.

We submit that our comments and submissions made in respect of section 4 (as detailed above), should be taken into account and that any approval should be on the basis that buildings are single storey.



# Form 5 Submission on notified proposal for policy statement or plan, change or variation

[Clause 6](#) of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: Albert Edward (Ted) Taylor

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

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

The specific provisions of the proposal that my submission relate to are:

The proposed provisions as set out in the document “Welhom Developments Ltd Cashmere Oaks Drive, Request for a Private Plan Change to the Combined Wairarapa District Plan, April 2022” (Planning Document) prepared by Building Block Planning, specifically:

The following parts of Section 7.3 Option 2- The proposed rezoning and specific provision for a retirement village. (This is listed as the “most appropriate” option, page 69.)

- The environmental benefits
- The environmental costs

My submission is:

That the proposed plan change be declined for the following reasons:

## **1. The environmental benefits**

a. Urban planning issues

The Planning Document states (page 67) that “Urban development of the Site will be consistent with the Council’s urban growth strategy which identifies the Site as a possible

future urban development area. It will also be a logical extension of a neighbouring site presently undergoing urban development”.

The first part of this paragraph refers to a technical document that was prepared for Masterton District Council, “Boffa Miskell (2019) Masterton Urban Growth Strategy: Planning for Growth to 2043” (MUGS) to assist in a review of the district plan.

The plan change proposed is not part of any formal structure plan or similar planning document that guides the extension of the Masterton residential area. The MUGS exists only as an aid to decision making in relation to urban planning and would not have been intended as support for the proposed plan change. Furthermore, the area identified as C03 in the MUGS (Map 5, Page 56 of the Planning Document) encompasses both the area to which the proposed plan change relates plus a balance of land bordering on Opaki Road. In other words, if the MUGS is to guide urban growth, then this should be decided in total for area C03 district wide and not piecemeal.

The second part of the paragraph indicates the proposed plan change will be “a logical extension of a neighbouring site”. This refers to the final stage of development of the Cashmere Oaks Estate which is currently being constructed. The layout of this stage is illustrated in Figure 5-1 on page 9 of Appendix 6 of the Planning Document. This shows a complete and fully integrated layout of roads, properties and reserve. There is no indication that there was any thought when this was envisaged that it would ultimately be extended to the north.

Figure 6-1 on page 11 of Appendix 6 of the Planning Document shows access to the landlocked property, (the proposed plan change property, the Site), from the Cashmere Oaks Estate by converting the cul de sac adjacent to lot 102, lot 103 and the reserve to a through road.

This again is an example of taking an *ad hoc* approach, the proposed plan change is not a logical extension of the Cashmere Oaks Estate. The proposed change makes no provision for access to Opaki Road and integrating this with any future change to a residential zone for the whole of the area C03 identified in the MUGS.

In summary, the environment benefits identified in the Planning Document that relate to urban development and the MAGS and the relationship with the adjoining property cannot be supported.

#### b. Landscape

The Planning Document states that “the Site is suitable for urban development given its negligible environmental values in terms of landscape....”



This statement is based on the Landscape and Visual Assessment attached as Appendix 3 to the Planning Document. In this assessment it is stated (page 6), in relation to views of the site from private locations, that it was "Open to no views of the Site from dwellings located to the north, east and south of the Site" This is incorrect as large parts of the Site are able to be viewed from properties on the west side of Sir Herbert Hart Avenue. If the proposed development went ahead there would be a significant visual effect on these dwellings particularly the view of the 14m building.

The statement that there are negligible landscape effects cannot be supported.

c. Ecology

The Planning Document states that "The Site is suitable for urban development given its negligible environmental values in terms of .... Ecology ....".

This statement is based on the Ecological Assessment attached as Appendix 4 to the Planning Document. This assessment is limited in that there is no consideration of the bird life that will lose their habitat. Examples of birds that are frequently observed in this rural area are Harrier Hawks, Spur-winged Plovers, Paradise Shelducks, Skylarks, Sparrows and Finches. These birds are already losing habitat with the extension of Cashmere Oaks Estate.

In the absence of a consideration of birdlife in the ecological assessment the statement that there are negligible environmental value in terms of ecology cannot be supported.

d. Services

The Planning Document states that "the Site is suitable for urban development given its negligible environmental values in terms of .... the ability for it to be appropriately serviced ...."

This matter is addressed as it refers to transport under Environmental Costs as it is considered that the benefits proposed are outweighed by the costs.

e. Hazards

The Planning Document states that "the Site is suitable for urban development given its negligible environmental values ..... through an absence of hazards ...."

This statement is based on the Preliminary and Detailed Site Investigation attached as Appendix 9 to the Planning Document. This document indicates a proper approach was used in assessing the site in relation to the National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health.

The use of the site for agricultural purposes is confirmed by the presence of cadmium at levels above background. The deficiency in the assessment is that having identified the agricultural use, then tests for the relevant organic compounds that are listed under “soil contaminant standards for health for organic compounds”, specifically DDT and dieldrin, should have been carried out.

In the absence of such testing the statement that there is an absence of hazards cannot be supported.

## **2. The Environmental Costs**

### **a. Traffic**

The Planning Document states that “Urban development of the Site will lead to associated environmental costs such as .... increased traffic movements....

The proposed plan change is completely dependent on using an extension of Cashmere Oaks Drive as access to the Site. This is detailed in Appendix 6 to the Plan Change Document, the Integrated Transport Assessment.

The assessment notes that the intersection on to State Highway 2 requires minor improvements as listed below (page 18 of Appendix 6).

- Refreshing line marking
- Gating of give-way signs
- Installation of a diverge chevron board opposite T-intersection
- Installation of intersection warning sign on the northern approach
- Lighting improvements at the intersection
- Vegetation trimming / removal to protect driver sightlines and visibility of the intersection

These improvements would benefit the existing traffic that uses the intersection but would not provide further benefit that would accommodate additional traffic from the Site.

The intersection of Cashmere Oaks Drive / Coralie Place / Sir Herbert Hart Avenue is identified as having an unconventional layout. This indicates that Cashmere Oaks Drive was not designed with the intention of servicing more than the current estate layout.

It is noted on page 20 of Appendix 6 that “The 4.85m lane widths will be able to accommodate the additional traffic that could be generated by development of the Site. This width will allow room for a vehicle to pass a cyclist at a slow speed but on-street car parking would not be expected.”

This statement is incorrect in that on-street car parking is more than likely to occur based on this happening on the existing roads in the estate. This diminishes the ability of Cashmere Oaks Drive to accommodate the additional traffic.

In summary, the costs of extending Cashmere Oaks Drive to service the Site fall on the current and future residents of the estate and as such the extension of the road to the Site cannot be supported.

I seek the following decision from the local authority:

That the proposed plan change be declined.

I wish to be heard in support of my submission.

Signature of submitter

Date 28 September 2022

Electronic address for service of submitter: [ted@taybiz.co.nz](mailto:ted@taybiz.co.nz)

Telephone: 0274 190 586

Postal address (or alternative method of service under [section 352](#) of the Act):

3 Sir Herbert Hart Avenue, Lansdowne, Masterton 5810

Contact person: Ted Taylor

# Form 5 Submission on notified proposal for policy statement or plan, change or variation

Clause 6 of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: Wayne Skipage

This is a submission on the following change proposed to the following plan:

Welhom Developments Limited Private Plan Change to the Operative Wairarapa Combined District Plan (2011)

I ~~could~~ could not\* gain an advantage in trade competition through this submission.

\*Select one

The specific provisions of the proposal that my submission relates to are:

The entirety of the Plan Change.

My submission is:

Kia ora

Thank you for the opportunity to make a submission on the above plan change.

Whilst no one wants to hold back progress in their town, changes such as these where there is not just intensified housing but also significant commercial activity that changes the dynamic of a community should be appropriately scrutinized.

I would like to provide some thoughts in respect to the following 6 areas:

1. Increased traffic flow – although the report notes that the streets in Cashmere Oaks are “wide”, they are not laned, do not have controlled intersections and do not have marked off parking. I think the increased traffic volume projections are probably light and will have a significant impact on entrance to and egress from the subdivision. Much better road marking and signage will be required, and given the demographics of the area, I would suggest speed should be limited to 30kmh.

2. There seems to be inadequate staff and visitor parking ring-fenced on the retirement village site. It would be preferable for this to be within the boundaries of the site to limit what could be significant day long parking by staff and visitors in the residential streets.
3. I'm not sure just moving the 50km zone on state highway 2 will be sufficient to manage traffic, and a roundabout at the entrance should be considered to reduce the chance of accidents.
4. To reduce car usage of residents, has any area been identified for the location of potential convenience stores for Cashmere Downs?
5. There is already considerable demand on the existing Landsdowne infrastructure, with water pressure being an annoyance for many residents in Cashmere Oaks already. Can the Council assure residents that this development isn't going to worsen peoples' experiences of council provided infrastructure services going forward?
6. With the new Avida village already being developed at the northern end of town, is this a result of MDC analysis supporting village locations in this part of the town? If so, what supporting services for older people will also be needed to be planned for and situated in this part of town in the near term? Should this be considered in terms of practicality and impact before approval of another village in this area?

Many thanks for considering my thoughts.

Nga mihi  
Wayne Skipage

I seek the following decision from the local authority:

I wish/~~do not wish~~† to be heard in support of my submission.

†*Select one*

\*If others make a similar submission, I will consider presenting a joint case with them at a hearing.

*\*Delete if you would not consider presenting a joint case*

Signature of submitter

*(or person authorised to sign on behalf of submitter)*

Date 28/09/2022

*(A signature is not required if you make your submission by electronic means)*

Electronic address for service of submitter: [w.skipage@xtra.co.nz](mailto:w.skipage@xtra.co.nz)

Telephone:

Postal address (or alternative method of service under [section 352](#) of the Act):

12 Coralie Place, Landsdowne, Masterton 5810

Contact person: Wayne Skipage

### **Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Form 5 Submission on notified proposal for policy statement or plan,  
change or variation

[Clause 6](#) of Schedule 1, Resource Management Act 1991

To Masterton District Council

Name of submitter: **Shane Hart**

Address for service: 11 McDonald Way, Lansdowne, Masterton 5810

Phone: 0212201008

Email: [shanehart1989@outlook.com](mailto:shanehart1989@outlook.com)

This is a submission on the following change proposed to the following plan:

**Welhom Developments Limited Private Plan Change to the Operative Wairarapa  
Combined District Plan (2011)**

I ~~could~~ **could not**\* gain an advantage in trade competition through this submission.

\*Select one

The specific provisions of the proposal that my submission relates to are:

**CIVIL ENGINEERING EFFECTS**

My submission is:

**I oppose the specific provisions in their current form; and disagree with 5.5 Civil Engineering Effects of the Request, specifically the statement made “The assessments undertaken confirm that the Site can be suitably serviced for the anticipated level of development proposed by the Request”.**

**Submission points:**

**Point 1 – Wastewater**

Submission:

1. My family own and live in a property at 11 McDonald Way, and have done so since May 2017.
2. In relation to the Request, section 5.5.5, the statement made *“The assessment considers wastewater demand from the Request, the capacity of the existing network and planned upgrades, and considers that the Site can be suitably serviced”* yet details



are not provided on the scope of the planned upgrades, nor are confirmed designs of services in Cashmere Oaks Stage 2.

3. The Riley Report (Section 5.4.1) notes that the final design and RL of the new proposed Cashmere Oaks Wastewater Reticulation and Pump Station is yet to be confirmed.
4. The Riley Report (Section 5.4.1) notes that the proposed PS discharges to a gravity main that connects to a 150mm-diameter main in Opaki Road (SH2).
5. It is not clear from the Request or any of the civil reports how the existing system will take the main flow from the PS to SH2.
6. I have concerns with capacity of the current system if this connection is to be via the existing 150mm-diameter main which runs down the center of McDonald Way and via easement through east side of 12 McDonald Way (joining on a manhole located on the rear property of 12 McDonald Way) before in flows toward Opaki Road via easements on 11, 13 and 15 McDonald Way.
7. There has been reoccurring blockages of the sewer between McDonald Way and SH2, and WaterCare have informed that the fall on the wastewater main in McDonald Way and via the easement appears to be insufficient and less than the required 1:200 fall.
8. Council planned upgrades for the Opaki Road main (noted in the Riley report (section 5.4.1) from 150mm diameter to 225mm or 300mm) will not address the limitations of the existing wastewater main between McDonald Way and SH2 due to insufficient size and fall, if this is part of the intended route.

### **Relief sought:**

The developer should confirm final design and RL of the new proposed Cashmere Oaks Wastewater Reticulation and Pump Station and confirm the wastewater connection to SH2.

More information should be provided on the state and suitability of the existing or planned wastewater mains affected by the Request.

### **Point 2 – Potable Water**

Submission:

9. My family own and live in a property at 11 McDonald Way, and have done so since May 2017.
10. Consistent with report by Riley Consultations, we note that water pressure in the street is particularly bad currently, especially during peak times.
11. I note the following assessment conclusion is included in the Request: *“the potable water supply demands for a mixed use of residential and retirement village activities at the site can be accommodated within these estimated demands”* The assessment also indicates *that the Council should consider the installation of booster pumps as part of already planned upgrade works to a local reservoir to ensure optimal performance of the network”*
12. This statement appears to be made on the assumption that the Council is upgrading the network with booster pumps. It is not confirmed at any point of the Request or consultant reports if the booster pumps are going to be installed.
13. Future planned reservoir upgrades mentioned in the report do not have any mention of booster pumps (only of storage volume)

14. The Riley Report (see Section 5.5.1) assumes an existing feed to the subdivision of 200mm, however Council records indicate the feed is only 150mm in Opaki Road further reducing to 100mm in Cashmere Oaks Drive (see attached document)
15. Section 5.5.2 of the Riley Report considers fire supply. It is noted that sufficient pressure in accordance with SNZ PAS 4509:2008 would be *“unlikely to achieve as the current static pressures are no greater than 200kPa”* and a booster pump *“will likely be required to maintain pressure to the hydrant and reticulated supply around the site”*.
16. It is clear from the afore mentioned points that the potable water supply demands for a mixed use of residential and retirement village activities at the site can **NOT** be accommodated with the current network, and effects have not been sufficiently explored or addressed
17. I note a current condition to the Cashmere Oaks subdivision (see Consent Notice issued pursuant to Section 221 of the Resource Management Act 1991 in respect of the Fee Simple subdivision of Lots 14-60 being subdivided of Lots 1-7 DP 386783, Lot 9 DP 386783, Lot 12 DP 386783 and Lot 13 DP 386783 and lodged for deposit under Plan No 429991) that *“Cashmere specific potable water supply network upgrades will be carried out at future stages of development when required when capacity becomes an issue within the Future Development Area. The cost of this work will be borne by the developer, regardless of the infrastructure being owned by the Masterton District Council”*.

#### **Relief sought:**

Upgrade work including installation of booster pumps at the reservoir needs to be carried out before further developments are approved (Upgrades should be funded either by the Cashmere Oaks developer or MCD; but noting point 22 above it appears this should be on the developer to fund).

It should be confirmed if the current existing water feed to the subdivision is 100mm, 150mm or 200mm as there appears to be some inconsistency between the reports, the developer and MCD records.

The Request should include an independent report including detailed analysis and design of the firefighting requirements for the development including how these may affect flows in the current subdivision, to ensure future firefighting needs can be satisfied.

I seek the following decision from the local authority:

**Not to approve the plan change request until appropriate upgrades to civil engineering (namely potable water and wastewater) are confirmed and agreed on, or an alternative plan submitted and agreed upon, and an outcome found where the private plan change will not place any property at risk due to insufficient water pressures for firefighting demands. A binding requirement to install booster pumps on potable water supply should be made before the plan change be granted.**

I wish/~~do not wish~~ to be heard in support of my submission.

† *Select one*

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

Signature of submitter:

*Shane Hart*

Date: 28/09/2022

Electronic address for service of submitter: shanehart1989@outlook.com

Telephone: 021 220 1008

Postal address (or alternative method of service under [section 352](#) of the Act): 11 McDonald Way, Lansdown, Masterton 5810

Contact person: [*name and designation, if applicable*]: Shane Hart – Home owner

### **Note to person making submission**

If you are a person who could gain an advantage in trade competition through the submission, your right to make a submission may be limited by [clause 6\(4\)](#) of Part 1 of Schedule 1 of the Resource Management Act 1991.

Please note that your submission (or part of your submission) may be struck out if the authority is satisfied that at least 1 of the following applies to the submission (or part of the submission):

- it is frivolous or vexatious:
- it discloses no reasonable or relevant case:
- it would be an abuse of the hearing process to allow the submission (or the part) to be taken further:
- it contains offensive language:
- it is supported only by material that purports to be independent expert evidence, but has been prepared by a person who is not independent or who does not have sufficient specialised knowledge or skill to give expert advice on the matter.

Supporting Images:

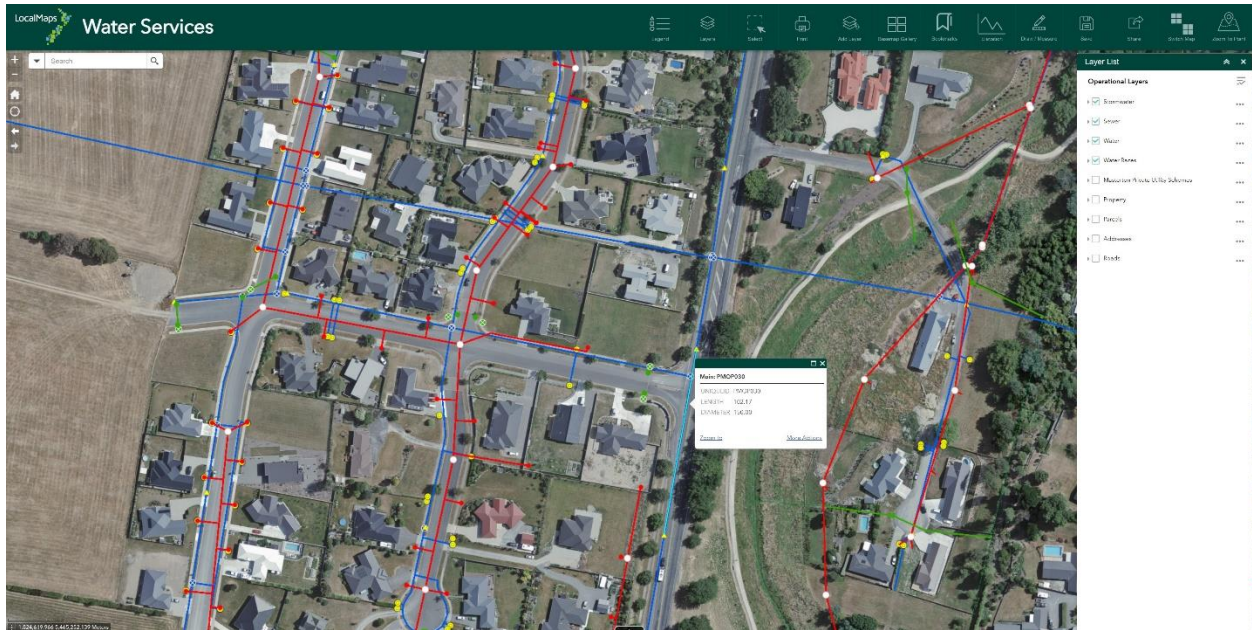


Fig. 1. Water Main in Opaki Rd (SH2) 150mm (source – MDC Gis Maps) showing 150mm water main in Opaki Rd.

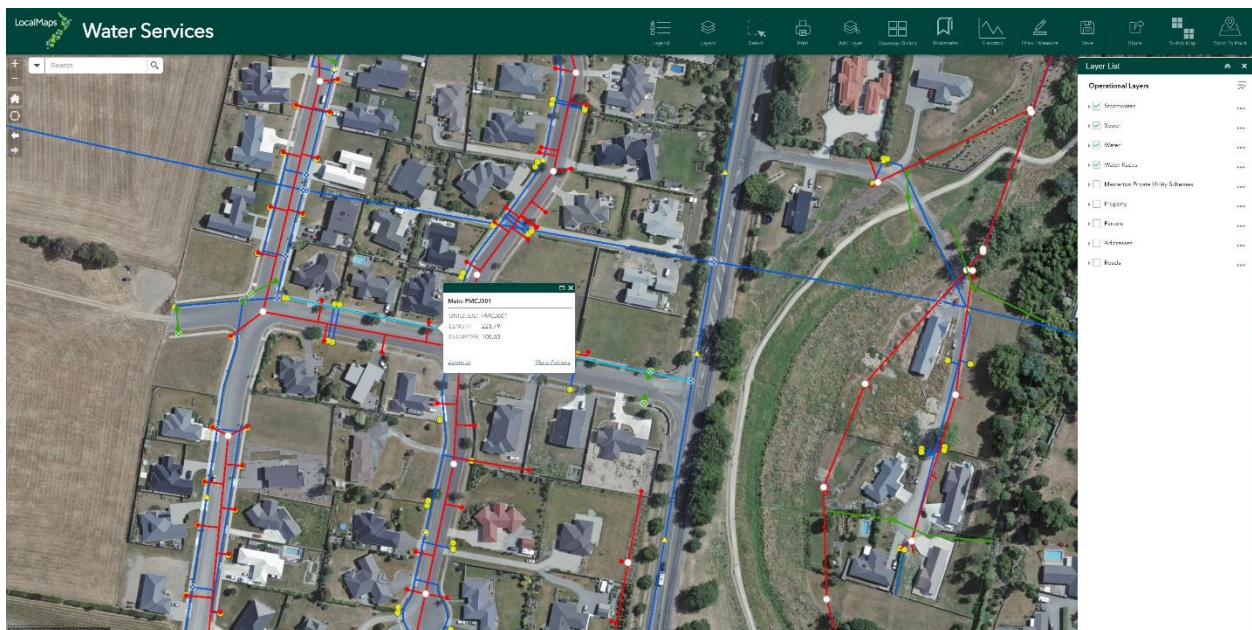


Fig. 2. Water Main Feed in Cashmere Oaks Drive 100mm (source – MDC Gis Maps) showing 100mm watermain feed in Cashmere Oaks Drive.



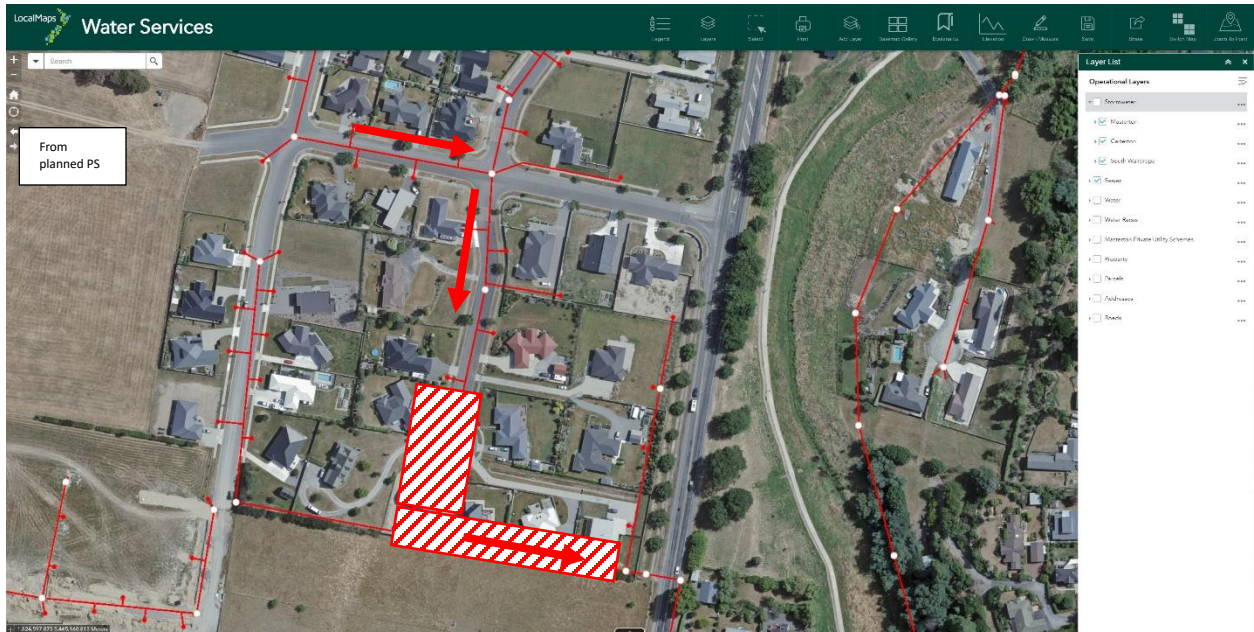


Fig. 3. Area affected where fall and size of current waste water network is insufficient and unlikely to handle additional proposed flows

Waka Kotahi NZ Transport Agency Reference: 2021:1908

28<sup>th</sup> September 2022

Masterton District Council  
C/- Megan Barr  
PO Box 444  
Masterton

Via email: [planningadmin@mstn.govt.nz](mailto:planningadmin@mstn.govt.nz)

Dear Megan,

**Submission on Welhom Developments Ltd. Private Plan Change Request – off State Highway 2, Lansdowne, Masterton** (legally described as Lot 3 DP 516269, Lot 36 DP 429991, Lot 1 DP 69308 and Part Lot 9 DP 65445 held in Record of Title 804394).

Attached is the Waka Kotahi NZ Transport Agency submission on the above private plan change request.

We welcome the opportunity to discuss the contents of our submission with Masterton District Council, and continue our discussions with the applicant as required or directed by hearings commissioners.

If you have any questions, please contact me.

Yours sincerely



Kathryn St Amand  
Consultant Principal Planner – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services

Phone: 021 1494051

Email: [kathryn.stamand@nzta.govt.nz](mailto:kathryn.stamand@nzta.govt.nz)  
[environmentalplanning@nzta.govt.nz](mailto:environmentalplanning@nzta.govt.nz)

**FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991**

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**Submission on Welhom Developments Ltd. Private Plan Change Request**

**To:** Masterton District Council  
C/- Megan Barr  
PO Box 444  
Masterton

Via email: [planningadmin@mstn.govt.nz](mailto:planningadmin@mstn.govt.nz)

**From:** Waka Kotahi NZ Transport Agency  
The Majestic Centre  
101 Willis Street,  
Wellington

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**1. This is a submission on the following:**

Welhom Developments Ltd. Private Plan Change Request to the operative Wairarapa Combined District Plan (2011) (the **Plan Change**).

- 2. Waka Kotahi NZ Transport Agency (Waka Kotahi) could not gain an advantage in trade competition through this submission.**
- 3. The role of Waka Kotahi**

Waka Kotahi is a Crown Entity established by Section 93 of the Land Transport Management Act 2003 (**LTMA**). The objective of Waka Kotahi is to undertake its functions in a way that contributes to an effective, efficient, and safe land transport system in the public interest. Waka Kotahi roles and responsibilities include:

- Managing the state highway system, including planning, funding, designing, supervising, constructing, maintaining, and operating the system.
- Managing funding of the land transport system, including auditing the performance of organisations receiving land transport funding.
- Managing regulatory requirements for transport on land and incidents involving transport on land.
- Issuing guidelines for and monitoring the development of regional land transport plans.

The Waka Kotahi interest in this proposal stems from its role as:

- The manager of the state highway system.
- A transport investor to maximise effective, efficient, and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe, and responsible transport choices.



### **Government Policy Statement on Land Transport**

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (**GPS**). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are:

1. safety,
2. better travel options,
3. climate change, and
4. improving freight connections.

A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure, and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. For these reasons, Waka Kotahi seeks full utilisation of the tools available to Council to enable development in the most accessible urban areas.

One of the key ways in which Waka Kotahi is to deliver on the GPS is via the [Road-to-Zero strategy](#). This strategy seeks that Death and Serious Injury (DSI) from road crashes is reduced and adopts the principal that no loss of life is acceptable. The vision of Road to zero is:

*Our vision is a New Zealand where no one is killed or seriously injured in road crashes. It is based on Vision Zero – a global movement that has seen significant decreases in road trauma in Sweden, New York and parts of Australia.*

*Adopting this vision for road safety means we need to make concerted efforts towards building a road transport system that protects everyone from road trauma. It represents a commitment to embed road safety principles and harm reduction in transport design, regulation, planning, operation and funding.*

The principal concerns for Waka Kotahi regarding the Plan Change are the implications for the safe and efficient function of the state highway network. The Plan Change area can only be accessed via the intersection of Cashmere Oaks Drive and Opaki Road/ State Highway 2 (SH2) ("the intersection"). Waka Kotahi does not consider that the Applicant has adequately assessed the traffic effects of the proposed Plan Change, particularly with respect to the intersection, and the integration of land use and urban expansion with the transport network at this locality. Crash prediction modelling undertaken by Waka Kotahi indicates that there will be an increase in DSI at this intersection following full development of the plan change area, together with already consented development in Cashmere Oaks. A different intersection type (a roundabout) would remedy this and provide a safer outcome. Waka Kotahi considers that, without investment to address the adverse traffic effects at the SH2 intersection, ongoing urbanisation at this locality through the Plan Change is not supportable.

Furthermore, to support an increase in people movements at this locality from ongoing urbanisation, which development of the Plan Change area will bring about, crossing facilities on SH2 are warranted. Crossing places would not be safe unless there is an infrastructure upgrade of SH2 in keeping with the ability to reduce speeds under the [Land Transport Rule: Setting of Speed Limits 2022](#).

#### 4. State highway environment and context

The intersection was approved by Waka Kotahi (then Transit) in the early 2000's. At the time the area known as the Cashmere Oaks future development area was undergoing its first phases of residential subdivision. Traffic volumes on SH2 were lower, and the district plan zone anticipates development with an average allotment size of 1,200m<sup>2</sup>. This low density effectively controls the volume of traffic anticipated at the intersection and approval for the intersection was caveated by Waka Kotahi with the low-density development scenario. The question put by this Plan Change request is whether the intersection in its current form will be suitable for the additional volumes of traffic generated from land uses within the plan change site?

Another important issue this Plan Change brings to light is that greater urbanisation will increase 'people movements' in the area, including vehicles, cyclists, and pedestrians. Within the vicinity of the plan change area is an extensively used [Recreation Trail Network](#). We already know from examining [Strava global heat mapping](#) that people living in the area have a desire to connect with this trail network in an efficient manner by crossing SH2 in the 100km/hr speed area rather than taking the footpath south to Fourth Street and crossing in the 50km/h speed area. These people movements exemplify the need for place making at this locality in any urban expansion scenario.

The Environment of SH2 at this location:

- The annual average daily traffic count of vehicles on this section of road are increasing, by an estimated 3% per annum (including 6% heavy vehicle traffic). This is unlikely in our view to change given that just immediately north are pockets of developing rural residential activities.
- The measured 85<sup>th</sup> percentile speed of the road past the Cashmere Oaks Drive intersection in 2019 (measured over the course of 1 week) was 82km/h. We also know from these measurements that some motorists are travelling faster, at or above the 100km/h speed limit all throughout the day.
- There is a footpath from Cashmere Oaks Drive, along the western side of SH2 into Masterton which upon observation in the field is being used by residents, Strava global heat mapping also shows good use of this footpath. That portion footpath within the 100km/h road speed environment is the responsibility of Waka Kotahi, whilst the portion of footpath in the 50km/hr threshold road speed environment is the responsibility of Masterton District Council.
- During morning and afternoon/evening peak times, most vehicle movements at the Cashmere Oaks/SH2 intersection are right out in the morning and left in during the evening.
- People already living at this locality have a desire to connect with the Recreational Trail Network on the eastern side of the state highway.
- Cycling along SH2 is common and Strava global heat mapping shows a reasonable level of cycle use.
- The current posted speed limit is 100km/h, and the safe and appropriate speed (SaAS) for this section of state highway (as it is now with no change) has been assessed at 80km/h, based on current infrastructure.

**5. This submission relates to the entire plan change request and all and any objectives, policies, rules and standards within the operative Wairarapa Combined District Plan that would apply to the land if it were rezoned urban, per the request.**

**6. The submission of Waka Kotahi is:**

**6.1. The Applicant's Integrated Transport Assessment** does not adequately assess effects.

The Integrated Transport Assessment (ITA) does not adequately identify all adverse effects on the receiving road environment that will result from future development scenarios. In particular:

- a. The SIDRA modelling analysis in the ITA uses traffic generation rates and state highway traffic volumes that are too low and does not appear to consider the future 5 or 10 years. The full Level of Service loss and the resulting traffic safety issues are therefore underestimated in the ITA.
- b. The ITA only provides peak hour traffic analysis. Overall traffic volumes at various times throughout the day and year (traffic volumes vary throughout the year and are considered to peak in summer months), have not been considered.
- c. The future traffic scenario has not been sufficiently considered; growth of traffic volumes on SH2 are underrepresented and do not consider local circumstances including traffic growth from rural residential land uses establishing upstream.
- d. Insufficient assessment of traffic safety issues for cyclists and pedestrians, and no traffic safety considerations have been made on crossing places for cyclists and pedestrians.

The Plan Change provides for a level of development that would more than double the traffic generation at the Cashmere Oaks/SH2 intersection. Waka Kotahi estimations are that development enabled by the plan change will result in an increase of between approximately two and three thousand vehicles per day, on top of the anticipated 1,600 vehicles per day from approved subdivision development of Cashmere Oaks. It is submitted that the receiving road environment, including the intersection, is not designed or developed to cater for this volume of traffic. The traffic safety effects resulting from this increase in vehicle generation will undermine the safe and efficient functioning of the transport network and increase the DSI rate at the intersection over time. The traffic safety effects from development of the plan change area are not anticipated nor identified by the Plan Change assessments and reports.

## **6.2. Multimodal implications – access to cycleways and amenities and place function**

Waka Kotahi is concerned that the Applicant has not given due consideration to cycling and pedestrian infrastructure, along with place function and a roading layout (by way of a structure plan) that would be facilitative of public transport in the future.

The plan change area is at the current rural/urban interface. This context has not fully or appropriately been considered in the s32 analysis; including the implications of a lack of road, cycling and pedestrian infrastructure to serve the needs of future residents of the plan change area. The Plan Change would create a residential zone in a location where there is insufficient connection between the proposed urban area and local recreational opportunities and amenities is therefore at odds with Part 2 of the RMA.

Introducing more residents in this locality on the western side of SH2 without the necessary infrastructure (crossing places) to support people moving between their homes and local amenities in the recreation trail network on the eastern side of SH2, will frustrate future communities and exacerbate existing poor connectivity leading to poor safety outcomes (pedestrians and cyclists crossing a fast section of state highway).

Development of the plan change area will ultimately put pressure on road controlling authorities to invest to fix the problems and, in the interim, will create real safety concerns for the community. Overall, Waka Kotahi considers that the Plan Change does not provide for the social and economic wellbeing of the community.

## **6.3. Adverse effects on the state highway corridor**

The ITA report puts the onus on road controlling authorities to address the impacts of traffic generation from development through speed management review. While Waka Kotahi acknowledges its role in ensuring the safety of the state highway network, an applicant is still required to avoid, remedy, or mitigate the effects stemming from its proposed activity. Waka Kotahi also disagrees that speed management

review of this section of SH2 is the primary mechanism for addressing the adverse traffic effects of the Plan Change. The current SH2 road environment at the Cashmere Oaks intersection has a posted speed limit of 100km/h, and whilst most motorists are travelling slower than that, it is acceptable for motorists to drive to the speed limit, and many do.

The SaAS has been assessed as 80km/h, and whilst Waka Kotahi is in the process of reviewing the speed limit for this section of SH2 to reduce it to 80km/h under the [Land Transport Rule: Setting of Speed Limits 2022](#), the results of that process could not yet be relied upon.

Waka Kothi could not (under speed management regulations), consider any further lowering of the speed limit without an infrastructure upgrade. To lower the road speed or move the urban 50km/h threshold out beyond the Cashmere Oaks Drive intersection, the road infrastructure must be upgraded to look and feel urban so to drive to the speed limit is intuitive for motorists. Where development is the instigator for the need for such change and related investment, through remedying or mitigating effects, the cost for such investment should be borne by the development. In this case that need is generated primarily from land uses that would be facilitated by the Plan Change, being the highest contributor to traffic generation in the area, and at the intersection.

If the traffic effects of the Plan Change are required to be remedied or mitigated with speed management, Waka Kotahi considers that the posted speed limit reduction from 100km/h to the assessed SaAS of 80km/h would be insufficient alone.

Waka Kotahi has undertaken a Safe System Assessment of the Cashmere Oaks/ SH2 intersection, under the loads of the traffic generation anticipated in the plan change area, including consideration of a retirement village land use. The results indicated that a roundabout intersection would be the most appropriate to serve the needs of future residents and road users.

At present there are no public projects, strategic investments or improvements proposed to alter or upgrade the receiving road environment to provide for the further urbanisation of land at this locality. Waka Kotahi and Masterton District Council are in the very early stages of a Point of Entry, which will lead into consideration of the need for investment and improvements, with the aim for any such investment to be considered for funding in the 2024-2027 National Land Transport Plan; however until that work is complete and funding decisions are made, there is no planning framework in place by which any future developer could make a financial or development contribution to public works that could mitigate the adverse effects of development in the plan change area on the wider transport network. This includes works that would instigate the ability to lower the speed limit of SH2 below the assessed SaAS of 80km/h.

#### **6.4 No further opportunity for traffic effects to be assessed at the consenting stage**

Waka Kotahi is not opposed to development of this location however, the existing road environment is not equipped to deal with the increase in traffic resulting from development of the plan change area, and the application does not address these adverse traffic effects adequately. Further, the effect of the Plan Change is to make development of the plan change area a Controlled activity under the District Plan. Any resource consent application to ultimately develop the plan change area would therefore not be required to assess the traffic effects of the proposed development on the Cashmere Oaks / SH2 intersection, nor would Waka Kotahi be required to be notified as an affected party.

Waka Kotahi considers that the traffic effects of any proposed development must be assessed as part of the consent application, because:

- A. The Cashmere Oaks/SH2 intersection is the only route by which to access the plan change site – it is therefore reasonable that Waka Kotahi be notified of development for which consent is ultimately sought.
- B. The consent application would contain a more detailed description of a proposed activity/development, and therefore more detailed estimates of traffic volumes.
- C. The consent application could be assessed against the existing road environment at that time (including any speed management reviews, and further urbanisation of 'look and feel' of the road corridor).
- D. It may be possible for the applicant to address the adverse traffic effects via development contributions, which is not possible in these plan change proceedings.

At this stage of the planning process (i.e., the Plan Change application), the additional traffic generated by development from land use activities provided for within the proposed urban zone must be considered to generate more than minor adverse traffic safety effects on the receiving road environment (specifically State Highway 2 and the intersection with Cashmere Oaks Drive), from the quantum of additional traffic anticipated. These effects could not be addressed (avoided, remedied, or mitigated) within the policy framework or rules proposed to apply to the plan change area. There is no rule in the district plan at present, nor any proposed in the plan change, that would provide for the consideration of traffic safety effects at the Cashmere Oaks Dr/SH2 intersection in any resource consent application scenario. The plan change request is therefore not in keeping with part 2 of the Resource Management Act, as it will not achieve a policy framework that will provide for the future communities social and economic wellbeing; nor their health and safety when it comes to transport safety.

The proposed plan change does not adequately consider Objective TT1 17.3.1 managing the road network; and related policies under 17.3.2 TT1 of the operative district plan which future development should be in keeping with. Development of either residential properties or a retirement village within the plan change area would be contrary with this policy framework because the function of the state highway (being a strategic arterial road) is not recognised and protected from the traffic generation that would result; no controls or standards for land use and subdivision are proposed that would avoid, remedy or mitigate the effects of future land use on the safe and efficient functioning and operation of the road network (in this case Opaki Road/ SH2); and there is nothing in the proposed plan provisions that would support and encourage the safe provision of non-vehicular (cycling and walking) forms of transport to and around the locality. A sound integrated transport and land use system should result from development however, the plan change as proposed will not deliver this outcome.

Considering the National Policy Statement on Urban Development 2020, which promotes urban development that reduces travel distances and lowers reliance on private vehicles. The proposed plan change introduces nothing that would be in keeping with this direction, it does not propose any changes to the existing road environment to promote mode shift in transport options, including public transport, cycling and walking; and does not seek to introduce district plan provisions that would require this outcome. The structure plan proposed is extremely limited and does not consider these matters.

Traffic generation from development within the plan change area will result in a higher rate of (DSI) at the intersection of Cashmere Oaks Drive and SH2, unless the road infrastructure is upgraded; a rural roundabout installation is considered an acceptable option to reduce DSIs, otherwise significant alterations (upgrades) to the look and feel of the road over at least 400m, would need to be made in order to reduce the speed limit to support the vehicle generation and people movements anticipated from development of the plan change site. Furthermore, it is noteworthy that statistically DSI crashes are more severe for older

demographics; therefore, development of a retirement village at this location without an upgrade to the road infrastructure is of significant concern to Waka Kotahi.

**7. Waka Kotahi seeks the following decision from the local authority:**

(i) Waka Kotahi opposes the Welhom Developments Ltd. Private Plan Change Request in its entirety and seeks the following decision from the local authority:

- To **decline** the plan change request in its entirety;

OR

- Should the local authority be mindful to confirm the plan change request, Waka Kotahi seeks significant amendments to the plan change to require consideration of the following outcomes:

Traffic safety:

- Introduce policy and rules that require an upgrade of roading infrastructure to support vehicle generation from activities within the plan change area, ensuring this could apply at either subdivision or land use application stages (Waka Kotahi would like to be involved in discussion of what a trigger may look like); **and**
- Consider changes to development contributions policy and rules to ensure there is the ability to remedy or mitigate traffic safety effects via such means and that the trigger for such contributions is agreed between Waka Kotahi and Masterton District Council; and
- Amend the activity status of any future subdivision or land use to Discretionary.
- Seek further information from the Applicant with respect to the adverse traffic safety effects that traffic generation from the plan change area will have on the Cashmere Oaks Dr/SH2 intersection; **and**
- Seek further information from the Applicant on the ways in which the adverse traffic safety effects, for all users, can be avoided, remedied, or mitigated; **and**
- Amend the plan change to require those traffic safety effects to be avoided, remedied, or mitigated in a way that is acceptable to Waka Kotahi and Masterton District Council, including by ensuring the traffic effects are included as a matter of discretion within the proposed policy and rule framework, OR
- Restrict development within the plan change area until roading infrastructure upon which it relies has been upgraded to cater for the development the plan change would facilitate, either by way of public works, private investment or through development/ financial contributions.

Walking, cycling and place function:

- Seek inclusion of, and require adherence to a more detailed structure plan that has details on how public transport, walking and cycling infrastructure will connect future communities with the rest of Masterton and the existing recreational opportunities in the immediate vicinity, specifically the reserve areas on the eastern side of SH2; **and**



- Introduce policy that requires an upgrade of roading infrastructure to support all people movements from activities within the plan change area, ensuring this could apply at either subdivision or land use application stages; OR
- Restrict development within the plan change area until the roading infrastructure has been upgraded to cater for the development the plan change would facilitate, either by way of public works, private investment or through development/financial contributions.

(ii) Any other relief that would provide for the adequate consideration of potential effects on the [state highway environment and all its users.

**8. Waka Kotahi does wish to be heard in support of this submission.**

**9. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.**

**10. Waka Kotahi is willing to work with Welhom Developments in advance of a hearing.**

Signature:



Kathryn Millar-Coote  
Team Lead - Central – Poutiaki Taiao / Environmental Planning  
System Design, Transport Services  
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date: 29<sup>th</sup> September 2022

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