

**BEFORE THE WAITAKI
DISTRICT COUNCIL**

UNDER

the Resource Management Act 1991
(RMA)

IN THE MATTER

of submissions on the Waitaki Proposed
District Plan

STATEMENT OF EVIDENCE OF DUNCAN LAWRENCE WHITE

For G and V Purvis (Submitter #114)

Dated: 28 September 2026

Statement of Evidence of Duncan Lawrence White

1 Introduction

- [1] My name is Duncan Lawrence White. I hold the qualifications of a Bachelor of Science in Geography, a Diploma for Graduates and a Post Graduate Diploma in Science. Both the latter two qualifications are in Land Planning and Development. These qualifications are all from the University of Otago.
- [2] I have 23 years experience as a planner. I have seven years planning experience with the Manukau City Council, including three years as a subdivision officer processing subdivision resource consent applications, followed by four years as an environmental policy planner undertaking district plan changes, policy development and the acquisition of reserves. For the past 17 years I have worked as a planner for Paterson Pitts Limited Partnership (trading as Patersons). Patersons is a land development consultancy that undertakes a variety of rural and urban subdivision, resource consent applications and plan change work, primarily around the lower South Island. Patersons has offices in Alexandra, Cromwell, Christchurch, Dunedin, Queenstown and Wanaka.
- [3] I prepared submission #114 and I am familiar with the site and context and confirm I have visited the site.
- [4] I confirm I have read the Code of Conduct for Expert Witnesses contained in the Environment Court Practice Note 2023, and agree to comply with it. I can confirm that this evidence is within my area of expertise, except where I state that I have relied on material produced by other parties, and that I have not omitted to consider material facts known to me that might alter or detract from the opinions expressed.

2 Scope of Evidence

- [5] This evidence has been prepared in support of submission #114 on the Waitaki Proposed District Plan on behalf of G and V Purvis to change the zoning of Part DP 5328 of 21.6 hectares (intersection of Saleyards

Road and Waiareka Lane, Waiareka Junction) from Rural Lifestyle Zone to General Residential Zone.

- [6] The submission site is a triangular site with the long side formed by the Alps 2 Ocean track, Saleyards Road to the south, Waiareka Lane to the south-east and the unformed legal road that extends District Road along its northern boundary. Access points to formed roads are available along the Saleyards Road and Waiareka Lane frontages. The extension of District Road from Weston Road to the old railway line and along the site's northern boundary is unformed. Topographically the site consists of two gullies. The central gully occupies the southern third of the site to the northern end of Waiareka Lane. Land on both sides of the gully slopes into the gully at a moderate grade. The north-western part of the site is a flat plateau that then slopes south to the central gully and north-east to the north-eastern gully and the south - western facing slope on the opposite side of the creek. A thin ridge extends south east from the plateau. The site is currently grazed. Sites on the northern and eastern sides of the subject site are all rural residential/lifestyle in nature and zoned Rural Lifestyle in the Proposed District Plan, as is the subject site. South of the site on the opposite side of Saleyards Road are the saleyards.



Figure 1: Submission site in black and white dashed line showing the General Residential Zone to the south-west in yellow and the Rural Lifestyle Zone of the site and surroundings shown in the light brown colour.¹

- [7] This evidence supports submission #114. This evidence provides assessment of housing capacity in Oamaru West, information on the serviceability of the site for three waters infrastructure and addresses the transport effects associated with development of the site in accordance with the proposed provisions of the General Residential Zone. This evidence also considers the alternatives, benefits and costs associated with the submission.

3 Overview of the Submission

Submission #114 seeks that the zoning of Part DP 5328 be amended from Rural Lifestyle Zone (RLZ) as notified to General Residential Zone (GRZ). A Structure Plan has been prepared by Patersons for the submission site and is included as **Figure 2** below. The Structure Plan provides a more detailed framework for how the land could develop if rezoned to General Residential. The structure plan provides for approximately 137 residential lots, with differing lot sizes responding to the topography and physical characteristics of the site. The Structure Plan also identifies the principal road connections, internal road network, recreation and stormwater corridors, and pedestrian and cycle

¹ From WDC GIS Proposed Waitaki District Plan Maps – accessed 23 September 2026

District Road

Westview Road

Westview Lane

Scale

Legend

LANDING RESIDENTIAL ZONE

Scale

North Arrow

Lot 1 DP 438556

Lot 2 DP 438556

Lot 3 DP 438556

Lot 4 DP 438556

Lot 5 DP 438556

Lot 6 DP 438556

Lot 7 DP 438556

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[8] The Structure Plan provides two principal external transport connections. At the northern end, the internal road network connects to District Road and Weston Road by forming the existing unformed legal road. At the southern end, the development connects through Waiareka Lane to Saleyards Road. These connections provide alternative routes between the proposed residential area and the wider Ōamaru and Weston transport network.

[9] The Structure Plan also provides two pedestrian and cycle connections to the **Alps 2 Ocean** route along the western side of the site. In addition, the extension of District Road connection crosses the Alps 2 Ocean route.

[10] A recreation/stormwater corridor is identified through the Structure Plan as following the central gully. This covers the natural drainage features and lower parts of the site and provide a framework within which stormwater management, recreation and open-space functions can be integrated as part of subsequent detailed subdivision design.

4

4 Housing Capacity and the Spatial Plan

Existing Strategic Direction and Spatial Plan

- [11] The most relevant strategic planning document for the submission is the *Ōamaru, Weston & Kakanui Spatial Plan May 2022*, adopted by the Waitaki District Council on 10 May 2022. The Spatial Plan is particularly relevant to this submission as it identifies Weston as a principal location for future residential growth in the District. The Spatial Plan specifically identifies the area west of Parsons Creek and east of the Alps 2 Ocean trail from Saleyards Road in the south to Homestead Road in the north as being new greenfield residential area (SP02). The Spatial Plan anticipates that new residential growth outside existing infill and intensification areas will be concentrated in this corridor towards Weston and identifies approximately 104 hectares east of Weston Road in this SP02 growth area, with an indicative capacity of approximately 850 to 1,430 dwellings.³
- [12] The submission site is outlined in orange in the Weston Spatial Plan in **Figure 3** below.

³ Waitaki District Council, *Ōamaru, Weston & Kakanui Spatial Plan*, May 2022, p56-57, Weston Spatial Strategy, Map 10



Figure 3: Annotated Weston Structure Plan showing site outlined in orange.⁴

- [13] The submission site has therefore already been identified through the Spatial Plan as land forming part of the planned direction for future residential expansion. The submission therefore does not seek to establish a new or unrelated direction for urban growth. Rather, it seeks to provide General Residential zoning and a more detailed Structure Plan to implement the strategic growth pattern identified by Council in the spatial plan.⁴
- [14] The Spatial Plan also recognises that identification of land for urban expansion is only the first step. For its larger growth areas it anticipates structure planning before development so that transport connections,

⁴ Waitaki District Council, *Ōamaru, Weston & Kakanui Spatial Plan*, Weston Spatial Strategy map 10 pp56-57.

three-waters infrastructure, open space and the staging of development can be considered comprehensively.⁵

- [15] In my opinion, Submission #114 should therefore be assessed principally in terms of whether the proposed zoning and the proposed structure plan represent an appropriate means of implementing the residential growth direction already established by the Spatial Plan, rather than whether urban development should occur in this general location at all.

Growth and Housing Capacity

- [16] The Spatial Plan anticipated approximately 4,950 additional residents across Ōamaru, Weston and Kakanui by 2051 under its high-growth scenario. It identified a requirement for approximately 1,900 additional dwellings over that period.⁶
- [17] Subsequent monitoring undertaken by Waitaki District Council records continued population growth. Council's *National Policy Statement on Urban Development Monitoring Report 2026* records the Waitaki District population increasing from 23,472 at the 2023 Census to an estimated 24,600 by June 2025. Council describes the District population as having reached record levels and identifies population change as the principal driver of increasing housing supply and demand.⁷
- [18] This information reinforces the underlying growth strategy. The population growth figures confirm that continued residential growth remains an issue that the PDP needs to respond to and provide context for considering whether land already strategically identified for future urban development should now be enabled. I do not interpret those figures as establishing that all land identified by the Spatial Plan

⁵ Waitaki District Council, *Ōamaru, Weston & Kakanui Spatial Plan*, May 2022, Land-use Strategy, "Residential Expansion".

⁶ Waitaki District Council, *Ōamaru, Weston & Kakanui Spatial Plan*, May 2022, Growth, pp30-31.

⁷ Waitaki District Council, *National Policy Statement on Urban Development: Waitaki District Council Monitoring Report 2026*, April 2026, pp 3-4.

must be zoned residential through the current PDP process. Instead, they demonstrate that the growth issue which led Council to identify future residential expansion areas through the Spatial Plan remains current. In my opinion, this provides a sound basis for considering whether land for which structure planning and infrastructure investigations have now been undertaken should be enabled through the PDP.

Contribution of the Submission Site

[19] The structure plan prepared for the submission (**Figure 2**) demonstrates how the land could function as a comprehensively planned residential neighbourhood. In particular, the proposed internal road network and external connections correspond with the strategic connections anticipated by the Spatial Plan. The Structure Plan is also consistent with the water quality improvements anticipated for Parsons Creek which forms the eastern boundary of the structure plan area. This provides an important level of consistency between Council's strategic growth planning and the more detailed site planning undertaken for Submission #114.

[20] The approximately 137 lots shown on the Structure Plan represent a meaningful contribution to residential capacity over the life of the Spatial Plan. For context, that capacity is equivalent to slightly more than two years of the approximately 65 dwellings per annum assumed under the Spatial Plan's high-growth scenario. I recognise that actual development and uptake would occur progressively and would depend on market demand.⁸

[21] This capacity is not proposed in isolation from Council's strategic planning. In my opinion, the combination of:

- a. prior identification of this location for future residential growth through the Spatial Plan;

⁸ Waitaki District Council, *Ōamaru, Weston & Kakanui Spatial Plan*, May 2022, relevant Spatial Strategy map, Land-use Strategy and Residential Expansion sections.

- b. a site-specific Structure Plan implementing the anticipated transport connections;
- c. approximately 137 lots designed to respond to the site's topography;
- d. defined recreation and stormwater corridors;
- e. direct connections to existing walking and cycling infrastructure; and
- f. supporting three-waters and transportation investigations,

provides a considerably stronger basis for residential zoning than simply identifying theoretical greenfield capacity.

[22] I therefore consider Submission #114 to represent a logical progression from strategic identification through the Spatial Plan to site-specific structure planning and technical assessment through the PDP submission process.

5 Three Waters Infrastructure Effects

Spatial Plan Infrastructure Context

[23] The Spatial Plan recognises that the larger greenfield growth areas require structure planning to establish the physical infrastructure necessary to support development. It specifically identifies efficient infrastructure provision and coordinated servicing as matters to be resolved through subsequent structure planning.⁹

[24] The three-waters assessment prepared for Submission #114 (**Appendix A**) responds directly to that requirement. It considers the servicing of the proposed development for stormwater, wastewater,

⁹ Waitaki District Council, *Ōamaru, Weston & Kakanui Spatial Plan*, May 2022, Land-use Strategy, "Residential Expansion". The Spatial Plan identifies its major future residential areas for Council-led structure planning to establish physical and social infrastructure requirements and staging.

potable water and firefighting supply and concludes that suitable provision can be made in accordance with Council standards.¹⁰

Stormwater

- [25] The infrastructure assessment divides the site into two principal stormwater catchments reflecting the existing topography. Both catchments have sufficient topographical fall to support gravity-based stormwater systems and secondary flow paths. Importantly, the structure plan provides sufficient land to accommodate a range of stormwater attenuation and treatment solutions, including the potential for an integrated catchment-wide treatment and attenuation system associated with the proposed stormwater corridors.
- [26] The ability to incorporate the natural drainage corridor into the development is, in my opinion, preferable to treating the watercourse simply as a constraint. It provides an opportunity for stormwater management to form part of the spatial structure and open-space framework of the development and aligns with the identification of water quality along Parsons Creek as shown on the Weston Spatial Plan.

Wastewater

- [27] Wastewater servicing requires a more engineered solution because the site's topography does not allow all development to gravity drain directly to the existing public network. The infrastructure assessment nevertheless identifies several technically viable options.
- [28] Existing public wastewater infrastructure includes a 150 mm main adjacent to the southern side of the site along the Alps 2 Ocean route, increasing downstream to a 225 mm main. The preliminary assessment concludes that there appears to be sufficient downstream capacity for the additional development demand, subject to confirmation through detailed design and hydraulic modelling.

¹⁰ Patersons, *Infrastructure Report: Saleyards Road/Waiareka Lane, Waiareka Junction, Oamaru*, prepared for G & V Purvis Limited, 23 September 2026, sections 3.1-3.4.

- [29] Potential servicing options include a predominantly gravity-fed internal network discharging to a central pump station near Waiareka Lane, or a combination of gravity and localised low-pressure pumping. The infrastructure report considers that practical wastewater servicing options are available, with the preferred solution to be established through detailed design.

Water Supply

- [30] The site lies across the interface between the Weston and South Hill water supply zones. The preliminary engineering design responds to the existing network configuration by providing separate servicing areas within the development from each of these supplies.
- [31] The eastern portion can be supplied from the existing 150 mm main at Saleyards Road, while the balance can be serviced from the existing 150 mm main at Weston Road/District Road. Preliminary pressure calculations identify sufficient pressure to meet NZS 4404:2010 and SNZ PAS 4509:2008 requirements. New hydrants would be incorporated within the development to provide firefighting coverage.

Three Waters Infrastructure Conclusion

- [32] The infrastructure report concludes that suitable stormwater, wastewater and water supply servicing can be provided in accordance with Council standards and that the proposed servicing would not adversely affect existing public infrastructure networks or the environment. I rely on that specialist engineering conclusion.
- [33] This report provides a site-specific infrastructure assessment of the type contemplated by the Spatial Plan for future greenfield development. The assessment identifies how the necessary infrastructure can be incorporated comprehensively into the structure and staging of the development.

6 Transport Effects

Spatial Plan Transport Direction

- [34] The Spatial Plan seeks better integration between land-use and transport planning and identifies improved connections between Ōamaru and Weston as part of the future transport strategy. The structure plan anticipates connections towards Weston Road via an extended District Road which is currently an unformed legal road and Waiareka Lane/Saleyards Road.
- [35] The Structure Plan does not provide the indicative connection towards Avoca Drive shown in the Spatial Plan. The existing Avoca Drive cul-de-sac terminates short of the northern boundaries of the Avoca Drive properties and the intervening pedestrian/cycle connection to the Alps 2 Ocean trail has recreation reserve status. Establishing a road connection in that location would therefore require additional statutory and land-tenure processes. In my opinion, the absence of that connection does not materially compromise connectivity given the two external road connections provided through District Road/Weston Road and Waiareka Lane/Saleyards Road.
- [36] I rely on the transport assessment prepared by Antoni Facey of Avanzar (dated 21 September 2026). It assesses access through Waiareka Lane/Saleyards Road and District Road/Weston Road and concludes that the structure plan provides sufficient detail to assess the transportation effects associated with the rezoning. This report is contained in **Appendix B**.¹¹

Access, Safety and Capacity

- [37] Existing traffic volumes are approximately 2,061 vehicles per day on Saleyards Road and 3,061 vehicles per day on Weston Road. Mr Facey's review of crash records between 2021 and 2026 identified four non-injury crashes and one minor-injury crash across the assessment

¹¹ Antoni Facey, Avanzar, *Transport effects of plan change for Saleyards Rd, Weston*, 21 September 2026.

area, with no common pattern or clustering indicating an underlying safety problem.

- [38] The proposed development would have two principal external road connections. One would utilise Waiareka Lane to connect with Saleyards Road. The second would form the existing legal road extending District Road across the Alps 2 Ocean corridor and into the development, thereby providing a connection to Weston Road.
- [39] The transport assessment concludes that appropriate sight distances can be achieved. Some relatively minor works are recommended at the Waiareka Lane intersection, including clearing the existing visibility splay and installing advance intersection warning signage. The District Road/Weston Road connection satisfies the assessed sight-distance criteria.
- [40] Based on the development scenario assessed by Mr Facey, approximately 959 vehicle movements per day would be generated using a conservative rate of seven trips per residential lot. A 50:50 distribution between the Weston Road and Saleyards Road connections has been assumed. The resulting intersection volumes remain below the Austroads thresholds requiring further intersection analysis, with the intersections expected to remain free-flowing and operate at an acceptable level of service.
- [41] Even allowing conservatively for the full development-generated traffic entering Weston Road and travelling in one direction, the resulting traffic volumes remain well within the capacity of the existing carriageway.

Active Transport and Alps 2 Ocean

- [42] The Alps 2 Ocean trail forms the south-western boundary of the site and the opportunities this affords for connectivity with existing walking and cycling infrastructure. Both Weston and Saleyards Roads are identified as walking and/or cycling routes and have shared paths on the side adjoining the development. The structure plan is capable of directly connecting the new neighbourhood with those facilities.

- [43] The proposed District Road connection would cross the Alps 2 Ocean trail. Mr Facey recommends cycle gateways on both approaches to the crossing to slow cyclists and alert them to the new road. Two additional connections between the development and the Alps 2 Ocean route are also proposed, providing direct recreational and active-transport access from the residential area.

Transport Conclusion

- [44] Mr Facey concludes that development can be served by two compliant intersections and that, subject to the identified localised works at Waiareka Lane and the Alps 2 Ocean crossing, the traffic and transportation effects of the rezoning would be no more than minor. I rely upon that specialist assessment.
- [45] In planning terms, I consider the transport assessment to provide an important link back to the Spatial Plan. The principal transport connections shown on the proposed Structure Plan occur in the locations and directions anticipated by the Spatial Plan providing a connected urban structure rather than an isolated subdivision. The exception to this is the connection back to Avoca Drive which due to the recreation reserve status cannot be achieved in this location.

7 Development Suitability

- [46] In assessing the suitability of the submission site for General Residential zoning, I consider its prior identification for future urban growth through the *Ōamaru, Weston & Kakanui Spatial Plan* to be an important starting point. The PDP section 32 evaluation confirms that the purpose of the Future Urban Growth Overlay is to identify Rural Lifestyle zoned land already considered suitable for future urban development and to ensure that its ability to accommodate more intensive residential development is not compromised in the interim.¹²

¹² Waitaki District Council, *Proposed Waitaki District Plan, Section 32 Evaluation Report: Residential Zones*, including sections 4.2, 6.2 and 7.4 concerning the Future Urban Growth Overlay and objectives SD-UFD-O2, SD-UFD-O4, SD-UFD-O5, SD-UFD-O6, RESZ-O1, FUG-O1 and FUG-O2.

[47] The Structure Plan prepared in support of Submission #114 takes that strategic identification to the next level of detail. It demonstrates how the land could accommodate approximately 137 residential allotments within a connected development pattern incorporating internal roads, recreation and stormwater corridors and pedestrian and cycle connections.

[48] In particular, I consider the following characteristics support the suitability of the land for General Residential zoning:

- a. the land is within the broader area already identified through Council's strategic planning as appropriate for future residential development;
- b. the Structure Plan provides approximately 137 residential lots distributed across the site at a range of indicative densities and lot sizes that respond to the site's topography;
- c. the Structure Plan provides two principal external road connections, being via Waiareka Lane to Saleyards Road and through formation of the unformed legal road to District Road and Weston Road;
- d. those connections provide alternative routes into and out of the development and correspond with the wider connectivity sought through planned urban expansion in this locality;
- e. the Structure Plan identifies dedicated recreation/stormwater corridors which follow the natural drainage characteristics of the land and allow stormwater and open-space functions to be incorporated into the overall development pattern;
- f. the infrastructure assessment identifies technically practicable solutions for stormwater, wastewater and potable and firefighting water supply and concludes that suitable servicing can be provided in accordance with Council standards;
- g. the transportation assessment concludes that the proposed transport connections can safely and efficiently accommodate

the anticipated development traffic, subject to defined localised works;⁴

- h. the development would have direct pedestrian and cycle connections to the Alps 2 Ocean route and the existing shared-path network on Weston and Saleyards Roads; and
- i. structure planning the site as a whole allows transport, infrastructure, stormwater, recreation and subdivision outcomes to be coordinated rather than in an ad hoc manner through separate subdivision proposals.

[49] On the last point, the PDP's approach to its larger Future Urban Growth areas is to require structure planning before rezoning. Council's section 32 evaluation expressly identifies structure planning as the means of managing the transition from Rural Lifestyle zoning to eventual urban development within the larger identified growth areas.

[50] Submission #114 is consistent with that approach. Rather than seeking GRZ zoning on the basis of zoning alone, a structure plan has been prepared in combination with infrastructure and transportation investigations. In combination these investigations demonstrate that the site can be developed in a way that is consistent with the Spatial Plan.

[51] Overall, I consider that the Structure Plan provides the link between the identification of the land for future urban growth in the Spatial Plan and subsequent detailed subdivision and engineering design through this evidence. In my opinion, the site is therefore both strategically appropriate and technically capable of development for the residential purpose sought by Submission #114.

7 Statutory and Planning Framework

Resource Management Act 1991 and Regional Direction

[52] I have considered the relevant statutory and policy framework under the RMA, including the operative Otago Regional Policy Statement 2021 (ORPS), the strategic and residential provisions of the PDP, the

Future Urban Growth framework and the *Ōamaru, Weston & Kakanui Spatial Plan*. I have also considered the alternatives, costs and benefits of the rezoning in accordance with section 32AA of the RMA.

- [53] The Otago Regional Policy Statement 2021 became operative on 9 July 2026 and is therefore the relevant operative regional policy statement for this assessment. Its Urban Form and Development provisions provide regional direction for the strategic and integrated management of urban growth. In my opinion, the proposed rezoning is consistent with that framework. The location has already been considered through strategic spatial planning, while the Structure Plan and supporting technical assessments provide an integrated framework for transport, infrastructure, stormwater and residential development.

Proposed District Plan Strategic Direction

- [54] The PDP Strategic Direction is particularly supportive of a structured approach to urban growth. The Council's residential section 32 evaluation identifies:

SD-UFD-02, relating to housing choice and access to infrastructure and transport;

SD-UFD-04, seeking urban environments that are liveable, connected, accessible, safe and well-designed;

SD-UFD-05, requiring Waitaki to grow in a cohesive, compact and structured manner while maintaining sufficient land for housing and other needs; and

SD-UFD-06, requiring future urban growth to be appropriately located and serviced with infrastructure and protecting Future Urban Growth areas for future residential development.

- [55] In my opinion, Submission #114 achieves those outcomes. The location of growth has already been strategically identified; the Structure Plan provides the structured component of that growth; the infrastructure report identifies how development can be serviced; and

the transportation assessment demonstrates how the development can connect with the established transport and active-mode networks.

- [56] The proposal therefore represents the implementation of a previously identified urban-growth direction through a comprehensive development framework. In particular, I consider the proposal gives practical effect to SD-UFD-O5 and SD-UFD-O6 as it provides a structured development response for land already identified for urban growth and demonstrates through the technical assessments that the relevant transport and three waters infrastructure can be provided.

Residential and General Residential Zone Direction

- [57] The residential framework of the PDP is also supportive of sufficient residential capacity in appropriate locations. RESZ-O1 seeks well-functioning urban residential environments with sufficient land in a diversity of locations to meet the residential needs of present and future populations, while recognising constraints imposed by the natural and physical environment.
- [58] The General Residential Zone is the PDP's principal residential zone and is intended to accommodate residential activities and a mix of building types and compatible activities. The Council's section 32 evaluation identifies the provision of sufficient housing capacity and choice, efficient infrastructure use and consolidated urban form as relevant outcomes of the residential framework.¹³
- [59] The Structure Plan demonstrates how those outcomes are achieved. The Structure Plan has a variety of residential densities, with larger lots concentrated in parts of the site where the topography and physical characteristics require a lower intensity of development, while smaller residential lots occur in flatter areas.
- [60] I consider that approach to be consistent with the purpose of the GRZ. The zoning would establish the appropriate urban land-use framework, while subsequent subdivision and detailed engineering processes

¹³ Waitaki District Council, *Proposed Waitaki District Plan, Section 32 Evaluation Report: Residential Zones*, sections 4.2, 6.1 and 7.1 to 7.5.

would determine the final subdivision configuration, servicing and development requirements.

Future Urban Growth and the Spatial Plan

- [61] The Future Urban Growth provisions are, in my opinion, particularly important to Submission #114. The Council's section 32 evaluation states that the Future Urban Growth (FUG) Overlay applies to Rural Lifestyle land identified as suitable for future urban development through the Spatial Plan. FUG-O1 expressly identifies those areas as being intended to remain available for more intensive residential development beyond the densities anticipated by the Rural Lifestyle Zone.¹⁴
- [62] The same evaluation explains that FUG-P2 requires preparation of a structure plan before rezoning within the larger identified FUG areas. The purpose is to ensure that future urban development occurs as part of a co-ordinated spatial framework rather than through incremental development which might compromise the desirable longer-term urban outcomes .
- [63] A Structure Plan has been prepared for this site and is included in **Figure 2**. The Structure Plan establishes the proposed road hierarchy and external connection points, provides active transport connections, identifies recreation/stormwater corridors and demonstrates a potential residential layout of approximately 137 lots.

Section 32AA Assessment and Overall Appropriateness

- [64] I have considered the costs, benefits and alternatives to rezoning the site. I have considered three principal options:
- a. retaining the notified Rural Lifestyle Zone and Future Urban Growth framework;
 - b. retaining that framework for now and deferring rezoning until a subsequent plan review or plan change; or

¹⁴ Waitaki District Council, *Proposed Waitaki District Plan, Section 32 Evaluation Report: Residential Zones*, above.

- c. accepting Submission #114 and applying the General Residential Zone in conjunction with the Structure Plan.

[65] Retaining the RLZ would continue to safeguard the land for possible future development but would not enable the residential capacity which the strategic planning framework anticipates. Deferral would preserve the same future opportunity but postpone the provision of approximately 137 lots and the associated housing capacity.

[66] In my opinion the principal benefits of GRZ zoning are:

- a. enabling approximately 137 additional residential lots in a strategically identified growth location;
- b. implementing rather than merely safeguarding the Spatial Plan growth strategy;
- c. establishing an integrated transport framework with two external connections;
- d. providing direct walking and cycling connections to the Alps 2 Ocean and existing shared-path network;
- e. enabling stormwater and recreation functions to be planned together through the identified corridors;
- f. providing certainty regarding the intended urban development of the site; and
- g. enabling a significant component of identified residential capacity closer to development readiness.

[67] The principal costs and potential adverse effects are the replacement of the existing rural lifestyle character with an urban residential environment, increased traffic, additional infrastructure demand and the physical changes associated with subdivision and development.

[68] Those matters have been considered through the Structure Plan and technical investigations. The transportation assessment concludes that the anticipated development can be accommodated by the surrounding road network and that traffic and transportation effects would be no

more than minor, subject to identified works at Waiareka Lane and the Alps 2 Ocean crossing.

- [69] Similarly, the three-waters assessment concludes that suitable provision can be made for stormwater, wastewater and water supply in accordance with Council standards and that provision of those services will not adversely affect existing public infrastructure networks or the environment.
- [70] In my opinion there is limited planning benefit in deferring rezoning solely because the Spatial Plan originally anticipated staged development over a longer period. The Council's subsequent 2026 NPS-UD monitoring expressly recognises that actual housing and household growth may require additional residential land or increased density to be enabled sooner than originally anticipated. The more relevant question is whether sufficient information exists to demonstrate that development can now occur in an integrated and appropriate manner.
- [71] I consider that threshold has been met. The Structure Plan and supporting infrastructure and transport investigations provide a sufficiently robust framework to demonstrate how the strategic residential outcome previously identified for the area can be implemented.
- [72] Having considered the alternatives and the relative costs and benefits, I consider that General Residential zoning, supported by the Structure Plan, is the more efficient and effective method of achieving the relevant PDP objectives and the intended long-term urban development outcome for the land.
- [73] I recognise that the Spatial Plan anticipates staging of future residential growth. In my opinion, enabling this part of SP02 through the current PDP does not undermine that principle. The subject land can be developed as a coherent unit, has two identified external transport connections, and the technical assessments identify practicable servicing solutions. Subsequent subdivision can itself be staged according to infrastructure delivery and market demand. The rezoning

therefore enables development capacity without requiring all of SP02 to be urbanised simultaneously.

8 Overall Planning Assessment

- [74] Submission #114 seeks to rezone the subject land at Saleyards Road/Waiareka Lane from Rural Lifestyle Zone to General Residential Zone. The site forms part of SP02, the future greenfield residential growth area extending between Waiareka Junction and Weston and has therefore already been identified through Council's strategic planning as appropriate for future urban development.
- [75] In my opinion, the key issue for this submission is not whether residential growth is appropriate in this general location, but whether sufficient structure planning and technical investigation has been completed to justify enabling that anticipated urban use now. I consider that it has. The Structure Plan demonstrates how approximately 137 residential lots can be accommodated within a connected neighbourhood incorporating two external road connections, recreation and stormwater corridors and direct pedestrian and cycle connections to the Alps 2 Ocean route. The supporting infrastructure and transportation assessments identify practicable servicing solutions and conclude that the anticipated development can be accommodated subject to the identified works.
- [76] I acknowledge that rezoning would bring forward the change from the existing rural lifestyle environment to urban residential development. I have also considered the alternative of retaining the FUG framework and deferring rezoning. In my opinion, the Structure Plan and supporting technical assessments materially reduce the reasons for further deferral. Importantly, development can still be staged through subsequent subdivision and infrastructure delivery rather than requiring SP02 to be developed in its entirety.
- [77] Overall, I consider Submission #114 represents a logical progression from strategic identification of the land for future urban growth, through site-specific structure planning and technical investigation, to an urban zoning. Having considered the Spatial Plan, the PDP strategic,

residential and Future Urban Growth provisions, the Structure Plan, infrastructure and transportation assessments, and the alternatives, costs and benefits under section 32AA, I consider General Residential zoning to be the more appropriate planning outcome. I therefore recommend that Submission #114 be accepted and that the subject land be rezoned General Residential, with the Structure Plan incorporated into the PDP to guide subsequent subdivision and development.

Duncan White

Dated this 28th day of September 2026

APPENDIX A – INFRASTRUCTURE REPORT

Infrastructure Report

Saleyards Road/Waiareka Lane

Waiareka Junction, Oamaru

Applicant	G & V Purvis Limited
Patersons Ref	P241012 Waiareka Lane
Date	23/09/2026

Version	Date	Prepared by	Reviewed by	Comments
0	23/09/2026	Jason Eichstaedt	Duncan White	

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1. Project Details

Site Location	Saleyards Road/Waiareka Lane/District Road, Waiareka Junction, Oamaru
Legal Description	Deposited Plan 5328 & Lot 1 Deposited Plan 18448 5724
Record of Title	OT297/162 & OT9B/1368
Area	21.6001ha, 4.1619ha (Total Area: 25.7620ha)

2. Scope

Patersons has been engaged by G & V Purvis Limited to provide an infrastructure report to support submission #114 to the Waitaki Proposed Plan to rezone the site at Saleyards Road/Waiareka Lane/District Road, Waiareka Junction, Oamaru from Rural Residential Zone to General Residential Zone.

This report covers the availability of the following infrastructure elements.

- (a) Stormwater
- (b) Wastewater
- (c) Water Supply — Potable & Firefighting

The overall site has associated different characteristics, ranging from ‘flatter’ land in the northwest with an elevation of 70m and sloping/hills in the southeast with a minimum elevation of approximately 45m. Approximately halfway along the southwestern boundary, a tributary enters the site flowing through the site to the northern section of Waiareka Lane. This tributary forms the basis and top catchment for Parsons Creek. The northern ‘face’ of the site is sloping into a separate valley which eventually links up with Parsons Creek further down the catchment.

A concept plan for the potential development of the site into 137 lots is shown in Figure 1 on the following page. This is a conceptual plan that shows how the site might develop and how future houses might relate to adjacent properties.



Figure 1: Concept Plan of Potential Site Development

3. Proposed Infrastructure

3.1 Stormwater

3.1.1 Proposal

For this development, the site can be divided into two primary stormwater catchments based on the existing topography and natural drainage patterns. The northern catchment comprises the northern face of the site and drains toward the unnamed tributary located to the north. The second catchment encompasses the balance of the site south of the northern face and represents the larger of the two catchments. Runoff from this area naturally drains toward the principal tributary that traverses the site and ultimately discharges in the vicinity of Waiareka Lane. This tributary forms the primary receiving environment for stormwater generated within the southern portion of the proposed development.

Northern Catchment:

The northern face of the site is characterised by steeper sloping terrain and is therefore anticipated to accommodate larger residential allotments. Stormwater runoff generated within this catchment would naturally drain toward the unnamed tributary located to the north of the development area. Where required, a reticulated stormwater network could be established to convey runoff to the tributary via a gravity connection at the north-eastern extent of the site.

The topography of the northern catchment provides sufficient grade to enable both primary stormwater conveyance and the establishment of effective overland secondary flow paths. Secondary flow routes can be incorporated into the subdivision layout to safely manage exceedance events, directing flows away from building platforms and private property while maintaining the integrity of the wider stormwater network.

Preliminary assessment indicates that there is adequate land available within the proposed development area to accommodate a range of stormwater management solutions. These may include lot-scale attenuation and treatment devices, distributed network controls, or catchment-wide stormwater management infrastructure, depending on future design requirements and council expectations. The available land area and favourable site topography provide sufficient flexibility to implement stormwater management measures capable of achieving stormwater neutrality for the development and mitigating adverse effects on downstream receiving environments.

Southern Catchment:

The southern catchment represents the primary drainage catchment within the site and encompasses the majority of the land proposed for rezoning. The catchment generally falls from the north-western extent of the site at approximately RL 70 m to the south-eastern extent at approximately RL 45 m, ultimately discharging to the existing tributary. In addition to runoff generated within the proposed development area, the catchment also receives stormwater flows from established residential properties located along Weston Road and Avoca Drive.

The site's topography is favourable for the provision of a gravity-reticulated stormwater network. Individual lots would be capable of discharging stormwater via private laterals connected to the public stormwater system or, where appropriate, through kerb outlet connections. Stormwater runoff

generated within the development would be conveyed through a piped network to the downstream tributary. Secondary flow paths can be incorporated within the subdivision layout to safely manage exceedance events, directing overland flows along road corridors and away from private property and building platforms.

A range of stormwater management and treatment solutions is considered achievable across the development area. These may include distributed lot-scale control measures through to an integrated catchment-wide solution incorporating stormwater attenuation and retention infrastructure within the proposed stormwater corridor. The existing upstream catchment can be intercepted and conveyed independently of the development's stormwater management system, utilising the natural fall available across the site. Preliminary assessment indicates sufficient land area is available within the proposed development to accommodate a variety of stormwater management solutions capable of achieving stormwater neutrality and satisfying relevant council stormwater design requirements.

3.2 Wastewater

3.2.1 Current Proposal

The natural topography of the site presents a greater challenge for wastewater servicing than stormwater, as gravity drainage is not uniformly favourable across the proposed development area. Despite this constraint, preliminary assessment indicates that several technically viable wastewater servicing solutions are available to accommodate the proposed development.

The existing public wastewater network servicing the area comprises a 150 mm diameter main located adjacent to the southern side of the site along the Alps to Ocean Cycle Trail. This network receives wastewater flows from residential properties on Avoca Drive before continuing south along Saleyards Road, collecting additional flows along its route. Downstream, the network transitions to a 225 mm diameter main, providing increased conveyance capacity. Based on a preliminary review of the existing network configuration and contributing catchment, there appears to be sufficient downstream capacity to accommodate the additional demand generated by the proposed 128 residential allotments, subject to confirmation through detailed design and hydraulic modelling.

Wastewater reticulation within the development could be achieved through a number of servicing approaches. One option would involve a predominantly gravity-fed network discharging to a central pump station located near the northern end of Waiareka Lane. Wastewater collected from the development would then be pumped along Waiareka Lane before connecting to the existing wastewater main within Saleyards Road. Based on the current site topography, this solution would require pumping against an approximate static head of 10 m to reach the receiving network.

Alternative servicing arrangements may include a combination of gravity reticulation and localised low-pressure wastewater pumping systems, allowing the network design to respond more efficiently to the site's varied topography. The most appropriate solution would be determined during detailed design; however, preliminary assessment confirms that practical and cost-effective wastewater servicing options are available for the proposed development.

Once discharged into the existing network, wastewater from the development would continue through the public reticulation system under gravity flow conditions before ultimately conveying to the existing pump station located on Regina Lane for onward transfer and treatment.

3.3 Water Supply

3.3.1 Current Proposal

The site is located at the boundary of two separate water supply zones. The existing public water supply infrastructure to the northwest of the site is part of the 'Weston Water Supply Zone'. The existing public water supply to the southeast of the site is part of the 'South Hill Water Supply Zone'. It is unfavourable to join water supply infrastructure across water supply zones.

In this preliminary investigation we have split the site into two separate water supply zones. The portion of the site to be served by the South Hill Water Supply Zone is the 33 eastern most concept lots adjacent to Waiareka Lane. The balance of the site, some 104 concept lots, will be serviced by the Weston Water Supply Zone. Our comments on the conceptual water supply design, per water supply zone, are given below.

South Hill Water Supply Zone:

There is an existing public 150mmØ principal water main located on Saleyards Road adjacent to the southeast corner of the site.

Potable Water Service:

To service the proposed development, a 150mmØ principal main will be installed from the Waiareka Lane/Saleyards Road intersection, through Waiareka Lane and the proposed roadway up to an end cap some 400m from the existing public main. A rider main may be installed within the site to reduce the number and lengths of road crossing to the principal main, this can be dealt with at the time of detailed design.

Each allotment will have a private water supply connection to the either a principal or rider main.

Fire Fighting:

There is an existing fire hydrant immediately to the east of the intersection of Waiareka Lane and Saleyards Road. An additional 2 hydrants will need to be installed within the development to ensure there is compliant spaces between the hydrants for fire fighting purposes.

Pressure Calculations:

We have undertaken approximate pressure calculations to determine the water pressure expected to be available from the site. Our calculations have shown there is sufficient pressure in the system to meet the requirements of NZS4404:2010 and SNZ PAS 4509:2008.

Weston Water Supply Zone:

There is an existing public 150mmØ principal water main located at the intersection of Weston Road & District Road, adjacent to the proposed northern entrance to the site.

Potable Water Service:

To service the proposed development, 150mmØ principal mains will be installed within the proposed roadways from the existing water main on Weston Road. Rider mains may be installed within the site to reduce the number and lengths of road crossing to the principal main; this can be dealt with at the time of detailed design. The new 150mm principal mains will not connect to the water supply serving the concept lots sourced from the South Hill Water supply Zone.

Each allotment will have a private water supply connection to the either a principal or rider main.

Fire Fighting:

Approximately 10 hydrants will need to be installed within the development to ensure there is compliant spaces between the hydrants for fire fighting purposes.

Pressure Calculations:

We have undertaken approximate pressure calculations to determine the water pressure expected to be available from the site. Our calculations have shown there is sufficient pressure in the system to meet the requirements of NZS4404:2010 and SNZ PAS 4509:2008.

Private Water Tanks:

We note a number of the concept lots are sized sufficiently to accommodate private water supply tanks. Upon detailed design of the development, the option remains that some sites may be more appropriately serviced for potable water by private water supply tanks. Any sites serviced by private water tanks will also need to be compliant against SNZ PAS 4509:2008.

3.4 Conclusion

Suitable provision can be made for stormwater, wastewater and water supply services to the proposed development in accordance with Council standards. The provision of these services will not adversely affect existing public infrastructure networks or the environment.



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APPENDIX B – TRANSPORTATION REPORT

Memo

To: Duncan White
From: Antoni Facey
CC:
Date: 21/9/2026
Re: **Transport effects of plan change for Saleyards Rd, Weston**

This memo provides an assessment of the transport effects associated with the rezoning of Part DP 5328 sought by submission #114 to General Residential zone at Saleyards Road, Weston. The site is currently zoned Rural Residential in the Operative District Plan and is zoned Rural Lifestyle in the Exemptions Version of the Proposed District Plan.

It is understood that the proposed change of zone to General Residential would allow for a subdivision of approximately 137 new Lots between 500 and 7,000 m² area as shown in the concept plan below in Figure 1.

The subdivision would be served by a series of internal roads with access from the existing road network at Waiareka Lane/Saleyards Road and the Weston Road/District Road intersections.

The level of detail provided in the concept plan is sufficient to assess the transport effects of the proposed zone change.

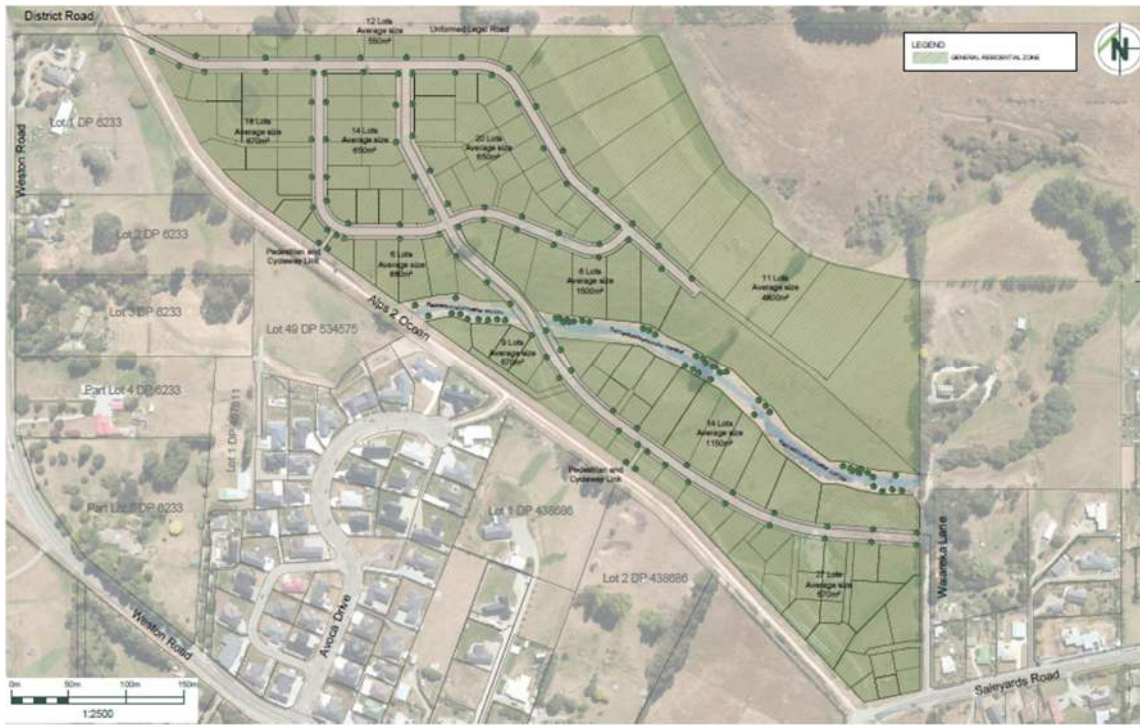


Figure 1: Concept subdivision plan

ASSESSMENT

Background

The current speed limit for Saleyards Road and Weston Road through the District Road intersection is 70 km/hr. The speed limit was raised from 60 to 70 km/hr in 2025

Waiareka Lane is approximately 225 metres from the Weston Road intersection. The intersection is on a horizontal curve. While driving the curve, it was observed that the speed value from the east was less than the speed limit. From the west, vehicles have negotiated the Weston Road intersection and typically have not reached the speed limit by the time they pass the Waiareka Lane intersection. AUSTROADS Guidelines state that the design acceleration for drivers is 1 km/hr per 5 metres. Negotiating the intersection at 20 km/hr and accelerating for 225 metres suggests that the speed at which drivers pass Waiareka Lane is less than 65 km/hr. From experience on site, this appears to be correct with the curve creating a lower speed environment. This is consistent with MegaMaps data. MegaMaps is the NZTA tool that provides data on all sections of road throughout NZ.

District Road/Weston Road intersection exists as a Tee intersection with an unformed paper road opposite. It is intended that the paper road will be formed to create a

crossroads and this will be the access to the subdivision from Weston Road. This access will cross the Alps 2 Ocean cycle trail.

The Proposed District Plan identifies Weston Road as a secondary collector road in the roading hierarchy and Saleyards Road as a local road.

Oamaru does not have a public transport system at this time.

Should the zone be changed, the subdivision will be considered a high trip generator with more than 20 potential residential units and will therefore be a restricted discretionary activity.

MobileRoads records show the traffic volume on Saleyards Road is 2061 vpd and 3061 on Weston Road.

CAS data/safety

The CAS database was searched for the period 2021 to 2026 inclusive to determine if there are any underlying safety concerns for Saleyards or Weston Roads in the vicinity of the site accesses. The area searched is shown below. Four non injury crashes and one minor injury crash were reported for the section.

The crashes did not exhibit any common characteristics or factors and were widespread with no clustering.

The crash record for the site is otherwise good and the reported crashes do not indicate any underlying safety problems.



Figure2: CAS search area

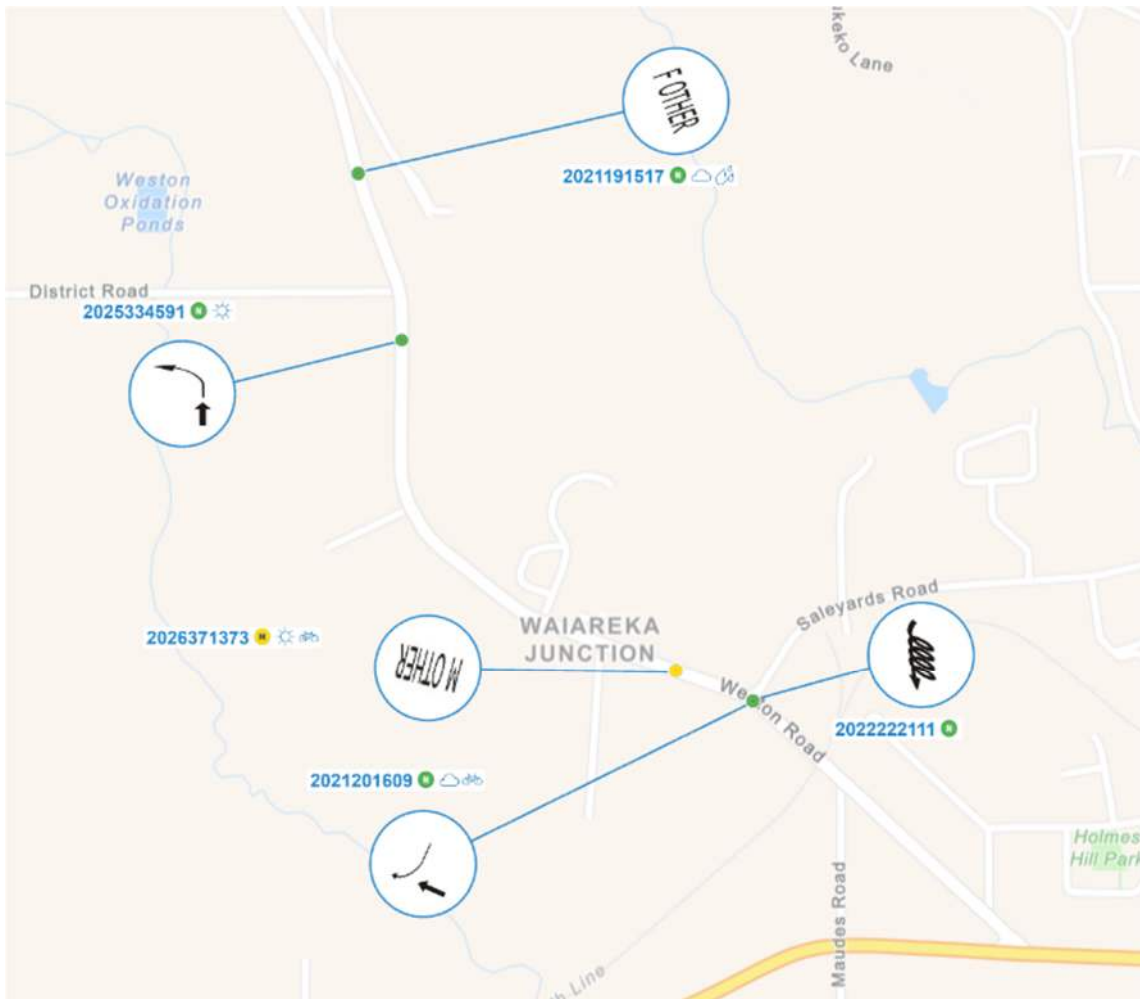


Figure 3: CAS reported crashes

Geometric Design

Waitaki District requires subdivision roads to be constructed in accordance with NZS 4404:2010 "Land Development and Subdivision Infrastructure". Being a greenfields development on a large site with generous Lot sizes, there is no reason that the road dimensions recommended by NZS 4404 for a development of this scale cannot be achieved.

No changes are proposed to the existing public road alignment.

Sight distance from the new intersections should be consistent with the AUSTROADS Design Guides. The AUSTROADS Guide to Road Design Part 4A "Unsignalised and Signalised Intersections" has requirements for sight distance at the intersections.

ASD can be achieved through the road design of the internal roads.

A minimum sight distance from the existing Saleyards Road access (Waiareka Lane) of more than 300 metres can be achieved to the east while the sight distance to the west is restricted to 140 metres by the property boundaries on the inside of the curve. AUSTROADS requires a minimum SISD of 123 metres for a speed environment/design speed of 60 km/hr and 151 metres for a design speed of 70 km/hr. These are based on a reaction time of 2.0 seconds. For a reaction time of 1.5 seconds, the SISD reduces to 114 and 141 metres respectively.

Note that MegaMaps shows the operating speed for this section of Saleyards Road to be 55 km/hr.

The available SISD from the west suggests that some additional warning of the intersection should be provided. This could be in the form of a W11-4 sign in advance of the intersection. Note that the intersection is existing and has no recorded crashes.

One issue with the intersection is that sight distance to the left from Waiareka Lane is obstructed by vegetation and a fence on the adjacent property. The LINZ plans suggest that a corner splay has been provided already and that this allows the vegetation to be removed back to the boundary to provide improved visibility.



For Weston Road, MegaMaps shows the operating speed around District Road to be 60 km/hr. This coincides with a SISD requirement from AUSTROADS of 151 metres.

Allowing for the vertical summit curve to the north of the District Road intersection, approximately 165 metres of SISD is available to number 81 Weston Road.

To the south, more than 300 metres of SISD is available.

Therefore SISD sight distance criteria are met.

Table 3.6 of the AUSTROADS Guide provides minimum gap sight distances for various speeds. For an 85thile speed of approaching vehicles of 60 km/hr and a sight distance of 133 metres, a minimum critical gap acceptance time of 8 seconds is achieved. Since all sight distances exceed this length, the critical acceptance gaps of Table 3.5 are met. The critical gaps from Table 3.5 are between 4 and 5 seconds so minimum gap sight distance criteria are met.

The minimum sight distance requirements of the AUSTROADS Design Guide can therefore be achieved in the concept design.

Intersection performance

Table 6.1 of AUSTROADS “Guide to Traffic Management” Part 3 2009 is reproduced below. This provides guidance on when an intersection analysis is unnecessary.

Table 6.1: Intersection volumes below which capacity analysis is unnecessary

Type of road	Light cross and turning volumes maximum design hour volumes vehicles per hour (two way)		
Two-lane major road	400	500	650
Cross road	250	200	100
Four-lane major road	1000	1500	2000
Cross road	100	50	25

Traffic generation from the completed development of 137 Lots will be around 959 vpd. This is based on each residential dwelling generating about 7 trips per day.

Surveys published by the TRIPS database show that a residential development in a peri-urban area such as the section of Weston Road between District Road Saleyards Road will generate 6.4 trips per day. With 137 potential dwellings, this is approximately 353 trips.

Other data sources support this traffic generation estimation. Surveys from West Melton have been quoted and accepted in hearings with an average weekday traffic volume of 5.85 vehicles per dwelling. The NSW Guide to Transport Impact Assessment

suggests a traffic generation of 7.53 trips per dwelling per weekday in low density residential dwellings in Regional NSW.

Based on the supporting data, it is considered that the traffic generation rate used of 7 trips per day per Lot is reasonable for the Saleyards Road development. This is considered a conservative estimate for this development.

A simple split of 50:50 has been assumed for traffic being distributed from the subdivision to both Saleyards Road and Weston Road once the subdivision is complete. Both alternative routes offer similar routes to the main urban area so there is no reason to expect drivers to prefer either route over any other.

Peak hour traffic volumes for a road are typically 10% of the daily total traffic volume.

With an existing ADT of 3,061 vpd on Weston Road, the peak hour traffic volume is around 306 vph on the main road. On District Road, the ADT is 63 vpd and the subdivision will generate 480 vpd into the intersection for a total side road volume of 544 vpd or 54 vph.

The existing traffic volume on Saleyards Road is 2,061 vpd and the peak hour volume is therefore 206 vph. The existing traffic volume on Waiareka Lane is 13 vpd with the additional 480 vpd from the subdivision for a total 493 vpd or 49 vph in the peak hour.

Based on Table 6.1 from AUSTROADS, both intersections are well below the threshold for further analysis and implies that the intersections would be considered to be free flowing with a Level of Service of A.

It is expected that the intersections will operate at an acceptable level of service.

Road capacity

The existing traffic volume on Weston Road is 3,061 vpd. Conservatively assuming all of the traffic from the subdivision entering Weston Road travelled in the same direction, adding the 480 vpd from the subdivision would take the traffic volume to 3,541 vpd or 354 vph in the peak hours or 1 vehicle every 10 seconds.

The typical capacity of a traffic lane is around 1600 vph in each lane.

This is well within the capacity of the carriageway.

Connectivity

The subdivision will have two connections to Weston and Saleyards Roads and internal connections linking the properties. This provides redundancy in the event of one intersection becoming unavailable for any reason.

The Waitaki Recreation Strategy identifies both Weston and Saleyards Roads as walking and/or cycling routes. Both roads have a shared path on the same side of the roads as the proposed subdivision. It is intended that the subdivision will provide cycling and walking connections to the existing infrastructure.

Within the subdivision, footpaths can be provided consistent with NZS 4404:2010 requirements.

Two connections are proposed between the internal roading and the Alps 2 Ocean to provide direct access from the internal roads to recreational cycling and walking network.

NZS 4404:2010 does not require separated cycle facilities for a rural or urban road carrying 875 vpd. Given the anticipated low cycle volumes generated from a 137 Lot subdivision, the carriageway should be sufficient for cyclists to use on the internal roads. Note that the recent changes to legislation allow young cyclists under 12 years of age to ride on the footpath that will be provided.

The new road constructed from Weston Road will cross the Alps 2 Ocean cycleway. To ensure cyclist safety, it is considered that gateways should be constructed on both cycleway approaches to the new road. This will slow cyclists and make them aware of the new road.

It is considered that the development will be well connected to the existing urban development in Oamaru and the walking and cycling network.

Conclusion:

The proposed 137 Lot subdivision at Saleyards Road will be connected to Weston and Saleyards Roads by two compliant intersections.

The following proposed road upgrades are required to ensure the concept plan provides an appropriate development:

- Improve visibility at Waiareka Lane by clearing the splay at the Waiareka Lane/Saleyards Road intersection.
- Upgrade Waiareka Lane to suit the new subdivision road layout.
- Install an intersection warning sign on Saleyards Road on the western approach to Waiareka Lane.
- Provide a set of cycle gateways on the Alps 2 Ocean cycleway at the new subdivision road extension from District Road.

Other compliant options may be available during the design stage that could be developed but the proposed concept offers a suitable development for assessment.

It is my opinion that allowing the plan change for Saleyards Road to General residential (Part DP 5328 as sought by submission #114) will have traffic and transportation effects that are no more than minor.



Antoni Facey

BE (Civil), CMEngNZ, IntPE(NZ), APEC Engineer