

From: info@waipadc.govt.nz
To: [Policy Shared](#)
Subject: External Sender: Waipā District Plan - Plan Change Submission Form 5 - Danielle O'Shaughnessy
Date: Sunday, 12 July 2026 11:58:30 pm
Attachments: [REF261267567.pdf](#)

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Full name of submitter Danielle O'Shaughnessy

Contact name (if different from above)

Email address

Address for service

Contact phone number

This is a submission on the following proposed plan change to the Waipā District Plan

Proposed Private Plan Change 31 - Te Awamutu T4 Growth Cell

Could you gain an advantage in trade competition through this submission? I could not

Are you directly affected by an effect of the subject matter that - (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition? I am

Do you wish to be heard (attend and speak at the Council hearing) in support of your submission? I do

If others make a similar submission, will you consider presenting a joint case with them at the hearing? Yes

Do you support the proposed change(s)? I support in part

The specific provisions of the plan change my submission relates to are (give details):

My submission relates to PPC31 in its entirety, with particular reference to Rule 15.4.2.91B in Part A – Proposed Plan Change, Appendix G (Structure Plan), the transport provisions in the notified Medium Density Residential Zone, Appendix D - Integrated Transportation Assessment (ITA), Appendix C (Urban Design Assessment), and Part B of the Section 32 Evaluation Report.

I support in part the proposed change(s) and my opposition is not to development itself but to particular parts of this proposed change, which applies the most intensive residential zoning available in the District Plan while relying entirely on Wallace Terrace, a short residential cul de sac, as the sole access point for the first stage of development.

My submission is

My position on PPC31:

I support in parts the proposed change(s) and therefore oppose PPC31 in its current form.

While I support residential development of the T4 Growth Cell, I do not support the rezoning sought because the proposal relies on Wallace Terrace as the sole vehicle access for the first stage of

development.

The actual, potential, and cumulative effects on Wallace Terrace have not been adequately assessed, and neither the Assessment of Environmental Effects (AEE) nor the Integrated Transportation Assessment (ITA) address school peak traffic, vulnerable users, or existing safety risks. This creates unacceptable risks for vulnerable users.

Wallace Terrace is a local road, not designed or intended to function as a through route or collector road, and the notified rules do not protect its intended function. The plan change would convert Wallace Terrace into a de facto collector road, conflicting with the District Plan transport hierarchy.

The Section 32 report also contains contradictory statements about traffic distribution and staging. My preferred outcome is that Wallace Terrace is not used for vehicle access at any stage and is retained solely for pedestrian and cycle connectivity to any new development.

1. Statutory Framework – Section 74 RMA

Under Section 74 of the RMA, territorial authorities must consider the purpose of the Act, including health, safety, and wellbeing; have regard to the actual and potential effects of implementing the plan change; and ensure alignment with District Plan objectives and policies. Schedule 1, clause 22(1) requires that a private plan change be supported by adequate information, including an assessment of environmental effects.

PPC31 fails these obligations because the actual, potential, and cumulative traffic effects on Wallace Terrace have not been adequately assessed.

The plan change relies on a local road functioning as a collector contrary to the District Plan transport hierarchy.

The AEE and ITA do not address school peak traffic, vulnerable users, or existing safety risks; the Section 32 report contains contradictions undermining its reliability; and the notified rules omit safety standards recommended by the applicant's experts.

2. Relevant Waipā District Plan provisions

The District Plan requires a well functioning urban environment that enables communities to provide for their health and safety. It also requires attractive and safe streets with passive surveillance.

PPC31 does not achieve these outcomes because Wallace Terrace is a local road designed for property access rather than movement. The plan change forces Wallace Terrace to prioritise movement function over access, contrary to the District Plan and the One Network Framework used by Waipā District Council. The applicant's own urban designer confirms this functional change, describing Wallace Terrace as being converted "from a long cul de sac to a more useful connecting street."

This is a fundamental change in road function that was not disclosed in the public notice, and the notified rules contain no standards protecting Wallace Terrace's intended function.

3. Contradictions between the ITA and the Section 32 Report

The Section 32 report states that the majority of trips are anticipated to arrive from or depart to the east and north. However, the staging rule (15.4.2.91B) triggers only Wallace Terrace at the first subdivision.

Even once the collector road is built, the ITA's assignment of 20% of development traffic to Wallace Terrace is likely an underestimate because bypass behaviour was not assessed. Wallace Terrace provides uninterrupted right of way to the Bank Street roundabout, and established driver behaviour shows that such routes attract higher volumes when delay based routing is not included.

The ITA contains no traffic counts for Wallace Terrace, instead estimating existing volumes from dwelling numbers. It contains no school peak assessment despite Te Awamutu Primary School being on the interim route, and it does not assess child pedestrian safety. It does not assess intersection performance at Wallace Terrace / Teasdale Street/ Fairview Road, nor cumulative effects from increased volumes and turning movements.

These contradictions are critical because the ITA informs the Section 32 evaluation, including the requirement to assess the risk of acting or not acting if information is uncertain or insufficient. The absence of assessment of bypass behaviour, school peak traffic, vulnerable users, or intersection safety means the plan change cannot rely on Wallace Terrace for vehicle access.

4. Actual, potential, and cumulative effects

The RMA requires assessment of all traffic related effects arising from PPC31. Clause 22 of Schedule 1 requires an AEE with detail matching the scale and significance of effects. Section 32(1)(c) requires evaluation of environmental effects of implementation, and Section 74(2)(a) requires consideration of actual and potential effects.

Section 3 defines effects to include cumulative, potential, temporary, and risk based effects. Therefore, the applicant must assess construction traffic, intersection safety, pedestrian safety, vulnerable users, geometric constraints, driveway conflict, sightline limitations, and cumulative effects from increased volumes and turning movements. The failure to do so is a statutory deficiency in both the AEE and the Section 32 report.

5. Risk based effects

The RMA recognises risk as an effect. NZTA's Safe System approach states that "the absence of crashes does not mean the absence of risk." CAS data does not capture near misses, and my community's lived experience shows the road is already operating at a dangerous safety margin.

6. Submitters evidence summary (copy of this information also provided as an attachment)

Stop sign non compliance at the Wallace Terrace / Downes Street/ Fairview Road intersections is consistently high, ranging from 76% to 84% across all observed periods (with video recordings also collected), and this behaviour directly contributes to repeated near miss incidents. Some near misses were observed, either involving a vehicle on Fairview Road failing to stop and pulling out in front of through traffic or a vehicle failing to give way on Downes Street, forcing drivers on Wallace Terrace or Teasdale Street to brake hard or travel slowly in anticipation of unsafe behaviour.

Residents report frequent near misses, increased caution while driving, and visibility issues caused by blind spots from the corner and slope, indicating that the problem is widely experienced and well understood within the community. Taken together, the observational data and resident feedback show a systemic intersection safety issue that would be compounded by additional vehicle movements.

Stop-sign compliance table

Observation period Failed to stop Stopped Non-compliance rate

5 July 2026, 10-11am 34 Not recorded Not available

5 July 2026, 4.30-5.30pm 94 18 84%

11 July 2026, 3-4pm 62 20 76%

Near-miss timeline

- 1/3/26 – 8:06am: Car travelling down Wallace Terrace; van failed to give way exiting Downes Street; hard braking required by vehicle on Wallace Terrace to avoid collision.
- 5/7/26 – 5:16pm: Car travelling from Teasdale Street to Wallace Terrace; vehicle on Fairview Road failed to stop; significant slowing required to avoid collision.
- 8/7/26 – 10:18am: Same pattern: Fairview Road vehicle failed to stop; driver on Teasdale Street already travelling slowly in anticipation and still had to slow further to avoid collision.

Neighbour survey summary

Although only 18 neighbours were able to be approached due to many households being away or not answering during the school holiday period, the responses still provide clear and consistent indicators of risk. Among those who were home, a significant proportion reported frequent near misses, blind spot issues, or having to drive with extra caution because of known stop sign non compliance.

This pattern emerging even from a limited sample suggests that the issue is not isolated, but instead widely experienced by those regularly using the intersection, reinforcing the observational evidence collected on multiple dates.

7. Construction traffic effects

Wallace Terrace is a local road not engineered for heavy construction vehicles or repeated heavy axle loads. It is already heavily used by vulnerable users and contains blind spot locations and documented near misses. Introducing heavy construction machinery into this environment creates a significant safety risk. The machinery is the hazard, but the combination of vulnerable users, blind spots, and existing near miss behaviour increases the likelihood of a serious incident from effectively zero to a level that is unacceptable under the RMA's risk based effects framework.

8. Wallace Terrace must not be used for vehicle access

Access for an additional 70 dwellings cannot reasonably be described as property access on a local road. Without the Rewi Street collector intersection, Wallace Terrace becomes the sole external connection, forcing it to operate as a collector despite being a cul de sac designed only for local property access.

Appendix G does not mandate Wallace Terrace as a vehicle access point; it simply shows a local road connection symbol consistent with pedestrian and cycle permeability. The requirement to use Wallace Terrace for Stage 1 vehicle access arises solely from Rule 15.4.2.91B, which can be amended without altering the Structure Plan.

The District Plan does not require Wallace Terrace to function as a vehicle access route, and the plan change should not impose this outcome.

I seek the following decision/s from Council

Decision Sought

Primary relief: decline PC31 in its current form.

Alternative relief – if Waipā District Council does not decline PC31, I request that the below standards be included in the District Plan to address my concerns:

- The Rewi Street collector link to be constructed and operational before any subdivision proceeds.
- To prohibit Wallace Terrace from being used for vehicle access at any stage, and to allow Wallace Terrace to be used only for pedestrian and cycle access to any new developments.
- Wallace Terrace must remain a local road in both designation and function, and development must not depend on it operating as a collector route.

Attachments

[PPC31_DOShaughnessy_Source_Reference_Table.pdf](#) (62 kb)

[DOShaughnessy PPC31 Submitters Evidence Summary.pdf](#) (222 kb)

PC31 – Source Reference Table

Every claim in Danielle O’Shaughnessy’s submission, with where to verify it in the PPC31 application documents. “absence” entries mean the point is that something is not in the document.

Road function, access, and staging

Claim	What the source says	Where to check
Wallace Terrace is a local road designed for property access, not movement.	"~500m no-exit local road, 12.4m carriageway, winding alignment, steep grades at both ends, parking both sides."	Appendix D (ITA), s3.2.3 (pp.8–9)
PPC31 forces Wallace Terrace to function as a through-route/collector.	Structure Plan shows a new local road connection to Wallace Terrace; staging rule triggers Wallace Terrace extension at first subdivision.	Appendix S27 (Part A) pp.xxiii–xxvi; Rule 15.4.2.91B (pp.xiii–xiv)
Proposal relies on Wallace Terrace as sole access for Stage 1.	"Extension of Wallace Terrace – when the first subdivision of the Northern Area occurs."	Rule 15.4.2.91B (pp.xiii–xiv)
Up to 70 dwellings rely solely on Wallace Terrace if Rewi Street link is not built.	"Maximum of 70 dwellings... in reliance on an extension to Wallace Terrace."	Appendix S27 (p.xxiii); ITA s9.2 (pp.51–52)
Notified rules do not protect Wallace Terrace’s intended function.	No rule in Part A imposes any safety or mitigation requirement for Wallace Terrace.	Part A — absence
Applicant’s urban designer confirms Wallace Terrace is being converted from a cul-de-sac to a connecting street.	"Converts it from a long cul-de-sac to a more useful connecting street."	Appendix C (Urban Design), s2.3 (p.9)

Traffic assessment, modelling, and contradictions

Claim	What the source says	Where to check
Actual, potential, and cumulative effects on Wallace Terrace not adequately assessed.	ITA contains no traffic counts for Wallace Terrace; relies on estimates; no school-peak assessment; no intersection assessment.	ITA Table 2 (pp.10–11); s8.1 (pp.37–38); absence of school-peak analysis
ITA estimates existing traffic rather than measuring it.	"No data available" for Wallace Terrace; estimate 134 vpd; ITA estimate ~426 vpd.	ITA Table 2 & footnote 4 (pp.10–11)
ITA assigns 20% of development traffic to Wallace Terrace.	Trip distribution assigns 20% to/from east via Wallace Terrace/Teasdale.	ITA s8.2 (p.37)
20% assignment likely an underestimate due to bypass behaviour.	ITA: bypass/through use "not considered in depth."	ITA s8.1 (pp.37–38)
Section 32 report contradicts ITA trip distribution.	Section 32: majority of trips expected east/north; ITA assigns only 20% east.	Section 32 Report (Part B) s8 (pp.53–54)
No assessment of Wallace Terrace / Teasdale / Fairview intersection.	No intersection modelling or safety assessment provided.	ITA — absence
No assessment of child pedestrian safety or school peak traffic.	School mentioned only as walking/cycling destination; no peak-hour analysis.	ITA s8.2 (p.37); Part B footnote (p.39) — absence

Safety, near-misses, and risk-based effects

Claim	What the source says	Where to check
RMA recognises risk as an effect.	Section 3 RMA includes "risk-based effects."	RMA s3
"Absence of crashes does not mean absence of risk."	NZTA Safe System principle.	NZTA Safe System documentation
Community near-miss evidence shows dangerous safety margin.	Submission evidence — not in PPC31 documents.	Near-miss log

Construction traffic effects

Claim	What the source says	Where to check
Wallace Terrace not engineered for heavy construction vehicles.	Local road, narrow, steep grades, winding alignment.	ITA s3.2.3 (pp.8–9)
Heavy machinery mixed with residential use creates significant safety risk.	No construction traffic assessment provided.	ITA — absence
Vulnerable users present; blind spots and near misses documented.	ITA acknowledges pedestrian/cyclist use but provides no safety analysis.	ITA s3.2 (pp.7–9); absence of safety assessment

Statutory Framework (RMA)

Claim	What the source says	Where to check
Section 74 requires consideration of health, safety, wellbeing.	s74(1) RMA.	RMA s74
Section 74(2)(a) requires consideration of actual and potential effects.	s74(2)(a) RMA.	RMA s74
Section 74(2)(b) requires alignment with District Plan objectives/policies.	s74(2)(b) RMA.	RMA s74
Clause 22 requires adequate information including AEE.	Schedule 1, clause 22(1).	RMA Schedule 1
PPC31 fails these obligations due to insufficient assessment.	Verified by multiple omissions in ITA and AEE.	ITA & Part B — absence entries

District Plan objectives and policies

Claim	What the source says	Where to check
Objective: well-functioning urban environment enabling health and safety.	District Plan Objective 1.	Waipā District Plan
Policy: attractive and safe streets with passive surveillance.	District Plan Policy 3.	Waipā District Plan
PPC31 does not achieve these outcomes.	Wallace Terrace forced into movement function; no safety standards.	ITA s3.2.3; Part A — absence

Submitters evidence summary

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