

Submission Summary

Nelson Tasman Future Development Strategy – Submission #31806

Jackie McNae
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>The Submitters have a broad interest in residential and business growth areas across the region. They have been involved in a large number of residential and business park developments. Their overall submission to the Future Development Strategy (FDS) is their experience over the last 30 years in the region is that Councils have consistently under planned for the growth demands within the district. The FDS should be an opportunity to ensure for the next 30 years and potentially 50 years, that planning for growth keeps in front of demand. The attached submission sets out the specific issues of concern and details the areas for inclusion in the Future Development Strategy.</p> <p>The FDS should be looking at growth needs over the long term and should adopt a high growth projection as the basis for planning. History has shown that our region has often exceeded the high growth projection models, often significantly exceeded such models. As such the FDS must adopt a high growth model.</p> <p>The Submitters consider the yields identified are overly optimistic, particularly</p>

		<p>for intensification. The Submitters fully support Councils endeavours and provision within the Planning framework for intensification for a range of housing densities including High Density apartment and townhouse typologies. However the yields Council has identified arising out of intensification are overly optimistic particularly in the short to medium term. In many locations the areas identified for intensification are lower lying existing brownfield sites that often are heavily fragmented in the first place. As the FDS itself acknowledges, it will be quite a long timeframe to realise some of the intensification aspirations. In the meantime, ensuring that there is a full choice of supply in the market, for a range of housing typologies it is essential that there are the growth options available in all settlements, to ensure that housing options do not become any less affordable than they are currently. If Council limits the supply, and limits opportunities, housing affordability will continue to be a remote possibility for many in our Community.</p> <p>The Submitters support the opportunity to develop a growth settlement around the Tasman Coastal area providing for urban density of development and seeks to have the Rural 3 area reviewed and identified as Rural Residential.</p>
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Projects & Ventures Ltd - Sub # 31806 - 1



**FUTURE DEVELOPMENT STRATEGY
SUBMISSION**

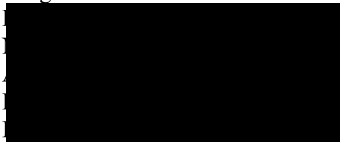
Submitter:	Projects & Ventures Ltd
Location:	Regional Wide Submission
Submission Summary:	The Submitters have a broad interest in residential and business growth areas across the region. They have been involved in a large number of residential and business park developments. Their overall submission to the Future Development Strategy (FDS) is their experience over the last 30 years in the region is that Councils have consistently under planned for the growth demands within the district. The FDS should be an opportunity to ensure for the next 30 years and potentially 50 years, that planning for growth keeps in front of demand. The attached submission sets out the specific issues of concern and details the areas for inclusion in the Future Development Strategy.

Dated this 14th day of April 2022



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(Signed by the Submitter’s authorised agent)

Address for Service:
Staig & Smith Ltd



SUBMISSION ON FUTURE DEVELOPMENT STRATEGY PROJECTS & VENTURES LTD

1.0 INTRODUCTION

- 1.1 Projects & Ventures Ltd are a management company that brings together syndicates for development within the region related to Urban Development, Rural 3 Development and Business Park Development. They have been involved, and continue to be involved, in a wide range of projects across the region, including development in Richmond West, Richmond South, Mapua, developments within the Rural 3 Zone, Pohara, Marahau and a range of Urban Development Projects within Nelson City.
- 1.2 Their experience in development over many decades in the region is that planning for development and infrastructure has always been well behind demand which has put pressure on supply and housing affordability.

2.0 GENERAL SUBMISSIONS ON THE FUTURE DEVELOPMENT STRATEGY PROPOSAL

- 2.1 The FDS summary of the proposal sets out core elements of the proposal. The following comments on those core elements, together with comments on capacity and yields.

Prioritising intensification of housing development in Nelson, Richmond, Brightwater, Wakefield, Mapua and Motueka.
- 2.2 The Submitters support provision for intensification and increasing housing development choices within all settlements in the region not just those nominated. The submitter does not consider it necessarily a matter of prioritising, it is a matter of making clear provision for intensification and ensuring there are few barriers to undertaking that intensification by ensuring the planning documents and those involved in assessing such developments within Councils work together to positively assist projects through the regulatory processes. The Submitters view is that there are too many rules/regulations which has lead to “can’t do not can do developments.
- 2.3 There is inconsistency across the region in providing for intensification, through inconsistent building coverage provisions across urban areas, some settlements are still only providing for 33 percent building coverage. In addition there are some fairly restrictive bulk and location rules across both Nelson and Tasman Resource Management Plans. There needs to be consistent coverage provision for standard density development of at least 40% and high density development should have coverage of 70-80%.
- 2.4 There needs to be a consistent approach across the region enabling intensification through having consistent rules, removing barriers to developers pursuing intensification. However, intensification within existing urban areas is only part of the solution to addressing housing needs.

- 2.5 The Submitters seek planning provisions within all planning documents to be less prescriptive on detailed elements and clearer on the outcomes sought so that developments don't get delayed by a myriad of Planning rules that hinder the timely provision of housing development.

Managed Greenfield Expansion Around Nelson, Richmond, Brightwater, Wakefield & Mapua with Provision for Rural Residential Opportunities

- 2.6 The Submitters support managed greenfield expansion alongside intensification, not prioritising one above the other as both are necessary to provide for the required quantity of housing together with housing choice in terms of location and typology. The Submitters support within greenfield expansion areas, that these areas also have opportunity for a range of development densities, including intensive development.
- 2.7 The Submitters oppose nomination of only some of the settlements in the region for growth. All settlements in the region should be provided with planned growth options.

Providing for some Managed Greenfield Expansion around the Rural Towns of Murchison, Tapawera, St Arnaud and Golden Bay

- 2.8 As noted above, the Submitters are of the view that all settlements need to have planned growth options both for intensification and expansion. This includes within Golden Bay at Pohara.

Provision for Commercial and Residential Growth within Existing Centres and Mixed Use Areas that will have a combination of Residential and Commercial Activities

- 2.9 The Submitters support mixed use development in existing centres for commercial and residential growth, this introduces vibrancy into the existing commercial centres and is an appropriate and efficient use of the existing infrastructure and resources that exist in commercial centres.
- 2.10 The Submitters though consider it important that planning in the future does not simply focus on established urban centres such as the urban centre of Nelson, Stoke, Richmond and Motueka. It is important to ensure that at the neighbourhood level, there is opportunity for commercial and community activity within neighbourhoods. Neighbourhoods should not be a place to simply live, they are places to connect socially, for recreation and leisure and for employment.
- 2.11 The rapid changes in how we work needs to be reflected in how we plan for residential and commercial growth. With people remotely working, working from home, and working flexible hours, opportunities at the neighbourhood level for connecting with people and having support for remote working within neighbourhoods is important. This means an increasing need for cafes, meeting rooms, shared office or employment support spaces, within residential neighbourhoods, not just within the urban centres. Councils shouldn't plan separately for residential, employment, community and recreational activities, these need to be provided for within the one neighbourhood. Future Residential Zone rules need to acknowledge and enable these requirements.

Providing Opportunities for Business Growth in Richmond, Brightwater and Wakefield and within Rural Towns of Murchison, Tapawera and Takaka

- 2.12 Business growth for light industrial and commercial needs to be enabled across the region. There are limited opportunities for business growth across the region and when these are opened up they are taken up very rapidly. The FDS has not provided sufficient opportunities for business growth across the district.
- 2.13 All settlements need opportunities for business growth, this needs to be both at the neighbourhood level as noted above and at the larger scale level for light industrial/commercial activity that is not suitable within residential neighbourhood communities.
- 2.14 The FDS is under planning for business growth in the region. It is difficult to direct business to suitable areas for development of new businesses and / or growth of existing businesses. There are significant gaps in provision for business growth in some settlements, notably provision for business growth in Mapua, an area that is rapidly growing yet there is no area for expansion of business activity.

Capacity vs Realistic Yields

- 2.15 The core proposal under the FDS provides for capacity of 26,300 houses over the next 30 years which the FDS states will be enough to meet demand under a medium or high growth scenario. The FDS based on the growth option identified, states that this capacity is achieved without the need to develop new communities at Hira or near Tasman village. There is an anticipation that 48 percent of the growth will be via intensification and 40 percent via managed greenfield expansion with small contributions from rural residential development and existing zoned capacity within existing greenfield areas.
- 2.16 The Submitters, reflecting on their experience over four plus decades, note Councils have consistently under estimated growth needs, consider that the capacity provided for is insufficient. The scenario that should be planned for is a high growth scenario.
- 2.17 The Submitters consider that the yields identified in the FDS, particularly in terms of what may be achieved through intensification within existing urban neighbourhoods are unrealistic.
- 2.18 Provision and support for intensification within existing settlement areas is supported by the Submitter, however at the same time the Councils need be realistic as to what is actually going to be yielded. Often it is simply not economically viable to undertake intensification while addressing barriers to intensification. A number of the settlement areas where intensification is identified are in areas that are low lying, maybe subject to liquefaction and sea level and/or flooding risk issues. Intensification may require significant raising of land. Raising of land then introduces other issues to be addressed in terms of accessing the service network, drive on access and potential to adversely impact established neighbourhoods, not only in terms of amenity but issues such as stormwater management. This does not mean that intensification should not be provided for, it should, however the FDS needs to be realistic about the yield from such a growth option and the realistic timeline for that yield.

- 2.19 The FDS itself notes that intensification may take a long time to achieve in some neighbourhoods, 15 years in some cases, but housing options are needed now. The Planning process timelines from plan changes, Resource Consenets, development timeline / market condition and Titles issuing ranges from 5-15 years. The market can change dramatically in this time frame.
- 2.20 The Submitters have been instrumental in the planning for growth at Richmond West. The Submitters involvement with the original land owners in Richmond West who had an interest in developing their land holdings for urban purposes dates back to the late 1990's early 2000's. For over 20 years the Submitters have been involved in a range of planning processes considering options for development in Richmond West. Through all this time, the Submitters stressed the pent up demand for development around the Richmond area. Eventually through the intervention of the SHA process there was the opportunity to push forward, with development in Richmond West.
- 2.21 When finally a planning pathway for Richmond West was confirmed through the SHA process, Council's view was that the land that was being brought on in Richmond West would provide for well over 18-20 years of growth. Some 1450 sections are being development in Richmond West most of which have been presold. The development timeline from SHA confirmation has been more like 7-8 years for 1450 sections and this underscores the issue of Council under estimating growth demands, as Richmond West now will be completed in the near future.
- 2.22 The Submitters are not satisfied that the FDS through the approach outlined will yield the capacity identified within the timeframe necessary. As such it is important that the FDS provides for a range of development opportunities in all settlements and a range of housing choices. Intensification is supported, but the yield from intensification projected is unrealistic in terms of a reasonable timeframe enabling demand to match supply.
- 2.23 In the consultation undertaken on the FDS Council Staff confirmed outcomes of various surveys. One survey statistic that was shared was the response from the Community as to what type of growth should be planned for in terms of higher density options such as apartments and townhouses, as opposed to detached housing and lifestyle blocks. The response, when it was from the wider community, was that up to 70 percent indicated that the provision and focus should be on high density options. However when Council conducted surveys individually of households, and asked what housing choice a particular household preferred, whether it was a high density option such as apartment or terrace housing, or a detached house or lifestyle block, 70 percent of the respondents in that case indicated their preference for a detached house or lifestyle block. This confirms the need to provide for choice of location and choice of housing typology. Over time, people's preferences will change because of their life stage, affordability and exposure to, and availability of quality housing at a range of densities.

Secondary Proposal for new Communities including Tasman Village

- 2.24 The FDS has put forward a secondary part of the proposal which includes a new community near Tasman Village. The Coastal Tasman area has been a focus for development over the last two decades. People wish to live in close proximity of the coast. There have been a range of Rural Residential and Rural 3 developments through the Coastal Tasman area and there continues to be a high demand to live in these locations including within the urban area of Mapua/Ruby Bay. The FDS has provided for some growth options in Mapua, but in the Submitters view, given the demand for coastal living, the FDS needs to look at the whole of the Coastal Tasman area.
- 2.25 Currently a significant part of the Coastal Tasman area is Zoned Rural 3 and whilst this has yielded a range of lifestyle communities within this area, such developments have faced quite uncertain consenting process and have taken extensive timeframes from conception to delivery. The Submitters have experienced this with their Harley Rd development.
- 2.26 The Submitters consider there needs to be a focus on this area, which should include further development around the Tasman community enabling greater intensification of development and making this area the hub for this part of Coastal Tasman. However, at the same time, there needs to be consideration of the surrounding land in Rural 3 and whether this area should be part of a Rural Residential Zone providing for greater certainty in terms of yield.
- 2.27 If the FDS is to achieve sufficient capacity for a high growth model, which is what the Submitters consider Council must do, then further development in Coastal Tasman is necessary to achieve the yields required.
- 2.28 In consultation Webinars, issues related to Climate Change and expansion options that potentially increased the need for travel, particularly commuter travel, were raised. The Submitters acknowledge these issues, but caution a conclusion that all housing will result in a corresponding increase in traffic movements. The reason for this relates to the population demographic settling in areas such as Coastal Tasman, which is often an older age group and further, the changes in where and how we work impacts travel movements. Working from home, remote working and flexi working is now common place. There has been rapid change in the last 2 years as to how we work.
- 2.29 The Consultation method for the FDS itself, is an indication of the changes happening. Compare the FDS Consultation approach to pre Covid Council consultation exercises, there would have been numerous meetings all over the Region where 100's of people would have travelled to Council buildings, halls or other meeting places. However all the FDS consultation meetings, and there were many, were dealt with remotely by the Panel and the Public attending via Webinars.
- 2.30 Council Planning decisions for the future must be based on high growth models to achieve supply meeting demands, to overcome current inadequate growth calculations by previous Council Planning assessments.

3.0 OUTCOMES SOUGHT

3.1 The following sets out the outcomes sought by the Submitter.

- (i) The FDS should be looking at growth needs over the long term and should adopt a high growth projection as the basis for planning. History has shown that our region has often exceeded the high growth projection models, often significantly exceeded such models. As such the FDS must adopt a high growth model.
- (ii) The Submitters consider the yields identified are overly optimistic, particularly for intensification. The Submitters fully support Councils endeavours and provision within the Planning framework for intensification for a range of housing densities including High Density apartment and townhouse typologies. However the yields Council has identified arising out of intensification are overly optimistic particularly in the short to medium term. In many locations the areas identified for intensification are lower lying existing brownfield sites that often are heavily fragmented in the first place. As the FDS itself acknowledges, it will be quite a long timeframe to realise some of the intensification aspirations. In the meantime, ensuring that there is a full choice of supply in the market, for a range of housing typologies it is essential that there are the growth options available in all settlements, to ensure that housing options do not become any less affordable than they are currently. If Council limits the supply, and limits opportunities, housing affordability will continue to be a remote possibility for many in our Community.
- (iii) The Submitters support the opportunity to develop a growth settlement around the Tasman Coastal area providing for urban density of development and seeks to have the Rural 3 area reviewed and identified as Rural Residential.

4.0 HEARINGS

- 4.1 The Submitters seek to be heard in respect of their Submission and would be available for a Hearing at the identified dates of the 27th of April, the morning only of the 28th of April or 3rd of May.
- 4.2 The Submitters seek a one hour time slot for their submissions.

Submission Summary

Nelson Tasman Future Development Strategy – Submission #31807

Jennifer Rose
Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>See multiple attachments.</p> <p>In relation to the NTFDS there are specific components which Kāinga Ora supports and areas which Kāinga Ora makes recommendations.</p> <p>Kāinga Ora supports the Councils in forming the NTFDS and recognises the importance of the Proposal in synthesising existing high-level planning documents, analysis, and information to form an initial recommendation for future growth and development in the Region.</p> <p>The core proposal could provide for approximately 26,000 new homes across the Nelson Tasman urban environment while a new community near Tasman Village could provide a further 3,200 homes.</p> <p>The supporting technical document to the NTFDS indicates that wastewater capacity at Bell Island WWTP requires further upgrades within the next three years to that already underway. It does not however provide a degree of comfort that upgrades can be identified, implemented, and funded so as not to delay the implementation of the proposal.</p> <p>Kāinga Ora is not supportive of a new Tasman Village community being established because this option has raised significant cultural concerns from local iwi (Te Ātiawa). Kāinga Ora respects the concerns Te Ātiawa has with this secondary aspect of the</p>

		<p>Proposal and supports ongoing kōrero, engagement and hui with Te Taihū iwi to better understand their aspirations for urban development in the Top of the South.</p> <p>Kāinga Ora supports consolidated growth focused largely along the Regions' existing transport corridor (State Highway 6), further investment in public transport and prioritising intensification of housing development in existing main centres to minimise the need for people to travel by private car and promote the use of public transport, walking and cycling as a means of achieving a reduction in greenhouse gas emissions in the Region.</p> <p>Kāinga Ora supports the Council's Proposal for intensification of housing and commercial development in Nelson, Stoke, Richmond, Brightwater, Wakefield, Māpua and Motueka as it will build transport resilience by reducing traffic volumes in the centres as well as the connecting road network, and by providing travel choice for the communities in the Top of the South. Reliance on private motor vehicle is expected to reduce if communities are able to live close to centres, public transport corridors and walking and cycling linkages.</p> <p>Overall, except for the secondary part of the Proposal (which relates to the establishment of a new</p>
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14 April 2022

Tasman District Council
189 Queen Street
Richmond
Tasman 7020

[Submission to Tasman District Council, online:](https://submissions.tasman.govt.nz/my-council/public-consultation/submission/new/1304/Nelson-Tasman-Future-Development-Strategy)
<https://submissions.tasman.govt.nz/my-council/public-consultation/submission/new/1304/Nelson-Tasman-Future-Development-Strategy>

Feedback on Nelson Tasman Future Development Strategy 2022-2052

Introduction

Kāinga Ora – Homes and Communities (“**Kāinga Ora**”) at the address of service set out below provides the following feedback on the Draft Nelson Tasman Future Development Strategy 2022-2052 (“**NTFDS**” or “**the Proposal**”).

Feedback is provided below on the NTFDS, which outlines the strategic options for future housing and business land in the Nelson and Tasman regions for the period 2022-2052.

Feedback is targeted to those areas of the NTFDS of most relevance to Kāinga Ora to establish an understanding of Tasman District Council and Nelson City Councils’ (“**the Councils**”) high-level strategic approach to providing for future housing in Nelson and Tasman (“**the Region**” or “**Top of the South**¹”).

Of importance to Kāinga Ora is ensuring that the proposed NTFDS is consistent with the purpose of the National Policy Statement on Urban Development (2020) (“**NPS-UD**”). Kāinga Ora seeks a comprehensive strategy and encourages opportunities for appropriate consolidation and intensification in and around existing centres and surrounding transport nodes that aligns with current and future residential demand in the Region.

Background to Kāinga Ora and its interests

1. Kāinga Ora was formed in 2019 as a statutory entity established under the Kāinga Ora Homes and Communities Act 2019 (“the KOHC Act”). Under the Crown Entity 2004, Kāinga Ora is a Crown entity and is required to give effect to Government policies. Kāinga Ora has two key roles:
 - a. being a world class public housing landlord; and
 - b. leading and co-ordinating urban development projects.
2. Kāinga Ora’s focus as a public housing landlord is to provide public housing that matches the requirements of those most in need. To achieve this, it has largely focused on redeveloping its existing landholdings throughout New Zealand. Kāinga Ora will continue this approach of redeveloping existing sites by using them more efficiently and effectively, so as to improve the quality and quantity of public

¹ Also referred to as Te Taihū



and affordable housing that is available. As set out in Section 12 of the KOHC Act, the objective of Kāinga Ora is to contribute to sustainable, inclusive, and thriving communities that:

- a. provide people with good quality, affordable housing choices that meet diverse needs;
 - b. support good access to jobs, amenities, and services; and
 - c. otherwise sustain or enhance the overall economic, social, environmental, and cultural well-being of current and future generations.
3. In addition, Kāinga Ora will play a greater role in urban development throughout New Zealand. Kāinga Ora's statutory functions in relation to urban development extend beyond the development of housing to the development and renewal of urban environments. It now also includes enabling or providing related commercial, industrial, community, or other amenities, infrastructure, facilities, services or works within its development areas. Therefore, in reviewing policy and planning documents around the country, Kāinga Ora also has an interest in how local authorities are encouraging a range of developers to provide for integrated urban growth.
 4. In undertaking its role Kāinga Ora seeks to build partnerships and collaborate with others in order to deliver on housing and urban development opportunities. This will include working with private developers, Iwi, Māori landowners, community housing providers and territorial authorities to enable the delivery of outcomes, through partnerships and the use of new powers to leverage private, public and third sector capital and capacity.

Kāinga Ora's landholdings in Nelson and Tasman

5. In Nelson City, the housing portfolio (excluding community group and transitional housing) managed by Kāinga Ora comprises approximately 709 dwellings, and in the Tasman district it has approximately 165 dwellings (874 in total)². The Nelson Tasman region is a priority area to reconfigure and grow Kāinga Ora's housing stock to provide efficient and effective public, affordable, and market housing that is aligned with current and future residential demand in the area and the country.
6. In general terms, housing supply issues have made housing less affordable and as such there is an increased demand for public housing. This is particularly so within the Nelson / Tasman region, where the public housing register³ has increased threefold– with 99 household applications in December 2016 to 426 household applications in December 2021⁴.
7. In recent years the demand for public housing has changed markedly from 2–3- bedroom houses, to single unit housing for the elderly and 4–5-bedroom houses for larger families. The demand contrasts with Kāinga Ora's existing housing portfolio of which a significant proportion comprises 2–3-bedroom houses on larger lots.

Scope of Feedback

8. Kāinga Ora is interested in all issues that may affect the supply and affordability of housing and has a shared interest in the Nelson/Tasman community as a key stakeholder, alongside local authorities. These interests include:

² As of December 2021 – see <https://kaingaora.govt.nz/publications/housing-statistics/>

³ The MSD Housing Register includes applicants assessed as eligible for social housing who are ready to be matched to a suitable property

⁴ Nelson and Tasman combined



- a. Minimising regulatory barriers that constrain the ability to deliver housing development;
 - b. The provision of public housing to persons who are unable to be sustainably housed in private sector accommodation;
 - c. Leading and co-ordinating residential and urban development projects;
 - d. The provision of services and infrastructure and how this may impact on Kāinga Ora existing housing, planned residential and community development and Community Group Housing (“CGH”) providers;
 - e. Working with local authorities to ensure that appropriate services and infrastructure are delivered for its developments; and
 - f. Ensuring all residents have safe, flexible and convenient access to an array of opportunities, including employment, services, recreation, and education.
9. This feedback is informed by the NPS-UD, which provides further direction around where growth should be located (i.e. within proximity to centres, jobs, education, amenities and services). Of particular relevance to the Region is Policy 5 of the NPS-UD, which requires Regional Policy Statements and District Plans applying to Tier 2 urban environments to enable heights and densities of urban form commensurate with the greater of:
- a) The level of accessibility by existing or planned active public transport to a range of commercial activities and community services; or
 - b) Relative demand for housing and business in that location.
10. The NPS-UD seeks to ensure that local authorities enable development capacity for housing and business through their land-use planning and infrastructure.
11. Kāinga Ora’s interest in the Region remains strong and relates to both its land holdings in the area, as well as the wider development of the future urban environment. For example, Kāinga Ora has previously provided feedback on the Whakamahere Whakatū Nelson Plan. Kāinga Ora is also investigating opportunities with Nelson City Council to develop high quality, public and affordable residential accommodation, with associated commercial and/or community activities, in the city centre.

Summary of Feedback – Nelson Tasman Future Development Strategy

12. In relation to the NTFDS there are specific components which Kāinga Ora supports and areas which Kāinga Ora makes recommendations.
13. Kāinga Ora supports the Councils in forming the NTFDS and recognises the importance of the Proposal in synthesising existing high-level planning documents, analysis, and information to form an initial recommendation for future growth and development in the Region.
14. The NTFDS provides a blueprint for the Region and sets out how the Nelson/Tasman region should grow and develop over the next 30 years.
15. It is recognised that the Councils have proposed a future development strategy that:
 - (a) Assumes that the high growth trend continues into the future (combined with smaller household sizes driven by an ageing population and increases in single person households) and



- (b) Up to 24,000 additional homes, 48 hectares of commercial land and 20 hectares of industrial land will be required over the next 30 years within the Nelson and Tasman “urban environment”.
16. The core proposal could provide for approximately 26,000 new homes across the Nelson Tasman urban environment while a new community near Tasman Village could provide a further 3,200 homes.
17. The mix of growth accommodated varies between Nelson and Tasman as follows:
- Nelson – 65% of growth is expected to be through intensification and 35% is expected to be through greenfield.
 - Tasman – 24% of growth is expected to be through intensification and 76% is expected to be through greenfield. This mix changes to 21% via intensification and 79% via greenfield if a new community near Tasman Village is included.
18. The following sections of the submission are grouped into topics that relate to specific aspects of the Proposal.

Infrastructure

19. The supporting technical document to the NTFDS indicates that wastewater capacity at Bell Island WWTP requires further upgrades within the next three years to that already underway. It does not however provide a degree of comfort that upgrades can be identified, implemented, and funded so as not to delay the implementation of the proposal.
20. A significant portion of Nelsons wastewater and water infrastructure is approaching end of life (as stated in the Council’s LTP). If managed well, there could be an opportunity to increase capacity while undertaking necessary renewals, and the Proposal could help align these often-competing asset owner duties.
21. A stated key driver to the Proposal is integrating planning decisions with infrastructure planning and funding. However, there is a lack of detail in the Proposal to demonstrate this has been achieved. The supporting summary & GIS viewer would indicate this could be particularly applicable to Motueka, Stoke, Brightwater & Wakefield.

New Tasman Village

22. The secondary part of the Proposal is the creation of a new community village in Tasman which includes land at Lower Moutere (Braeburn Road) and could provide up to 3,200 homes (the “**Tasman Village**”). The new Tasman Village is not part of the core Proposal. However, the Councils are seeking feedback on this option to understand the role it might play in catering for growth and to help inform any decision on the final pattern of growth in the FDS. If there is strong support for a new community near Tasman Village, the Councils will reconsider the amount of greenfield growth provided elsewhere to ensure the FDS promotes a more compact and efficient urban form that is easier to service with infrastructure.
23. Kāinga Ora is not supportive of a new Tasman Village community being established because this option has raised significant cultural concerns from local iwi (Te Ātiawa). Kāinga Ora respects the concerns Te Ātiawa has with this secondary aspect of the Proposal and supports ongoing kōrero, engagement and hui with Te Taihu iwi to better understand their aspirations for urban development in the Top of the South.
24. Further, the proposed option of having a new Tasman Village does not represent compact and efficient urban form that is easier to service with infrastructure. It is not aligned with creating sustainable communities and will result in an increased reliance on the use of private motor car which in turn will increase congestion and green house gas emissions to the detriment of the environment and the Te Taihu community. The creation of a new village could result in an inefficient outcome for the Region.



Green House Gas Emissions

25. Through land use planning, the Proposal has a key role to play in supporting a reduction in greenhouse gas emissions and ensuring that communities can adapt to the effects of climate change over time. Addressing climate change impacts has informed many of the core components of the Proposal, including the overall proposal and the assessment of different growth options and outcomes.
26. Locally, transport is a key contributor to greenhouse gas emissions in Nelson and Tasman⁵. The FDS can support a reduction in greenhouse gas emissions by promoting a compact urban form that minimises the need for people to travel by car and promotes the use of public transport, walking and cycling.
27. Kāinga Ora supports consolidated growth focused largely along the Regions' existing transport corridor (State Highway 6), further investment in public transport and prioritising intensification of housing development in existing main centres to minimise the need for people to travel by private car and promote the use of public transport, walking and cycling as a means of achieving a reduction in greenhouse gas emissions in the Region.
28. Kāinga Ora supports the Council's Proposal for intensification of housing and commercial development in Nelson, Stoke, Richmond, Brightwater, Wakefield, Māpua and Motueka as it will build transport resilience by reducing traffic volumes in the centres as well as the connecting road network, and by providing travel choice for the communities in the Top of the South. Reliance on private motor vehicle is expected to reduce if communities are able to live close to centres, public transport corridors and walking and cycling linkages.
29. Beca Ltd, on behalf of Kāinga Ora, has prepared a series of maps (included in **Attachment A**) which provide a spatial analysis to develop principles-based housing density outcomes for high and medium density residential areas in the Region. These are generally 400m- 800m walkability catchments around the metropolitan centres in the region, and 1200m around the Region's two main city centres (Richmond and Nelson).
30. Nelson City and Richmond CBD are considered the two main commercial and residential areas in the Region. They each have good access to existing amenities. It is therefore reasonable to consider higher growth options for these two key centres. Therefore, a 800m and 1200m walking catchment has been applied to these areas.
31. Residential areas within 800m of these centres are considered suitable for higher density living (low rise, medium rise and high density residential according to table 2 in the FDS Strategy document), and residential areas within 1200m are considered suitable for medium density living.
32. Stoke and Tahunanui are smaller but still Regionally significant centres, equivalent to Town Centre zones, As such a 400m walking catchment has been applied to these centres to show the area suitable for higher density residential use, and 400-800m catchment suitable for medium density residential use. For the smaller local centres in Mapua, Tasman Village and suburban Nelson and Richmond, a 400m walking catchment has been applied around these smaller commercial centres to identify land for medium density residential purposes, as they still benefit from proximity to these amenities.
33. The maps use publicly available paths and roads network datasets to find solutions that optimize travel time. From this analysis, potential density provisions (for each of the proposed growth areas) have been formulated which identify the residential areas that are suitable for high and medium density residential use.
34. Nelson City Council and Tasman District Councils use zoning classifications that differ to those in the National Planning Standards. Therefore, some assumptions have been made when assigning walking catchments to the commercial centres in the Region.

⁵ <https://www.stats.govt.nz/information-releases/greenhouse-gas-emissions-by-region-industry-and-household-year-ended-2019>



These assumptions are detailed in Table 1:

Treatment	National Planning Standard Zones	Nelson & Tasman Equivalent Zones
Suitable for low-rise, mid-rise or high density residential (marked as 'High Density Residential' in the maps included in the NTFDS)	800m from City Centres, Metropolitan Centres & 400m from Town Centres	800m from: <ul style="list-style-type: none"> - Nelson Inner City Centre - Nelson Inner City – Fringe - Nelson Inner City – Intense Development - The contiguous Central Business and Commercial Zones in Richmond Central 400m from <ul style="list-style-type: none"> - Tāhunanui Suburban Commercial - The contiguous Suburban Commercial Zones of Stoke Central
Suitable for medium density residential	400m from Local and Neighbourhood Centres 400m from high density areas	400m from: <ul style="list-style-type: none"> - All other Suburban Commercial Zoned areas in Nelson - Commercial Zones in Tasman Village, Mapua, and Richmond surrounds 1200m from: <ul style="list-style-type: none"> - Nelson Inner City Centre - Nelson Inner City – Fringe - Nelson Inner City – Intense Development - The contiguous Central Business and Commercial Zones in Richmond Central 800m from <ul style="list-style-type: none"> - Tāhunanui Suburban Commercial - The contiguous Suburban Commercial Zones of Stoke Central

Table 1: Potential Land Use Classifications

35. What the plans in attachment A demonstrate is that there is a potential opportunity to increase the areas currently mapped for medium and higher density residential use in the Region. Kāinga Ora recommends the Councils consider the maps provided in this submission as it further refines the boundaries of these growth areas so that it is maximising the opportunities for intensification in the Region.
36. In terms of education, Kāinga Ora also notes that the schools in Te Taihū will need to have the capacity to support these growth areas. It is recommended that the Councils identify the location(s) of the schools that will be needed to provide for the growth areas (and projected growth scenarios) identified in the Proposal.



37. In terms of public transport, currently, there are only 4 bus routes between Richmond and Nelson (and a further five 'loop' routes within Nelson). There is only one community bus service between Wakefield, Brightwater and Richmond (and this service is only available one day a week). There is no bus service between Motueka and Richmond⁶ and only a single 'loop' bus service in Richmond. Higher frequency public transport services, particularly between Wakefield and Richmond and Mapua and Richmond, and between Richmond and Nelson will support access to jobs, amenities and services while also encouraging modal shift. The Proposal provides a range of transport options and a well-connected network for both Kāinga Ora tenants as well as the residents of the Region into the future.
38. Moreover, Kāinga Ora acknowledges that Nelson and Tasman are Tier 2 urban environments under the NPS-UD. Therefore, Council is required to make planning decisions that contribute to well- functioning urban environments, and which enable a variety of homes that have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces⁷

Residential Intensification and Consolidation

39. Overall, except for the secondary part of the Proposal (which relates to the establishment of a new Tasman Village community), Kāinga Ora generally supports the opportunities for growth and intensification presented by the Proposal, in particular:

(a) High Density Intensification:

The Proposal prioritises intensification of housing development in the existing urban areas of Nelson, Stoke, Richmond, Brightwater, Wakefield, Māpua and Motueka. The Councils envisage this intensification will take many forms, and will range from small-scale infill (e.g. minor units/additional units on an existing site or within existing buildings) to attached housing developments in existing neighbourhoods, as well as more comprehensive apartment developments on larger sites within and close to centres and corridors.

In respect of the proposed Intensification area in Nayland South⁸ (Stoke), Kāinga Ora notes its boundary appears to follow an arbitrary alignment which excludes some of its landholdings to the northwest of Seaview Road. Kāinga Ora recommends that this Intensification area is expanded to include its landholdings and the surrounding residential area to better utilise this land for residential intensification (as it is already serviced) and create a more coherent and logical growth area as shown indicatively in Figure 1.

Kāinga Ora also notes that the schools in Te Tauihu will need to have the capacity to support these growth areas. It is recommended that the Council's identify the location(s) of the schools that will be needed to provide for the growth areas identified in the Proposal.

⁶ A bus service between Motueka and Richmond was trialled for six months in 2021 but has not been continued

⁷ Policy 1 – National Policy Statement on Urban Development 2020.

⁸ Referred to as site N-29 on the Council's Interactive GIS viewer

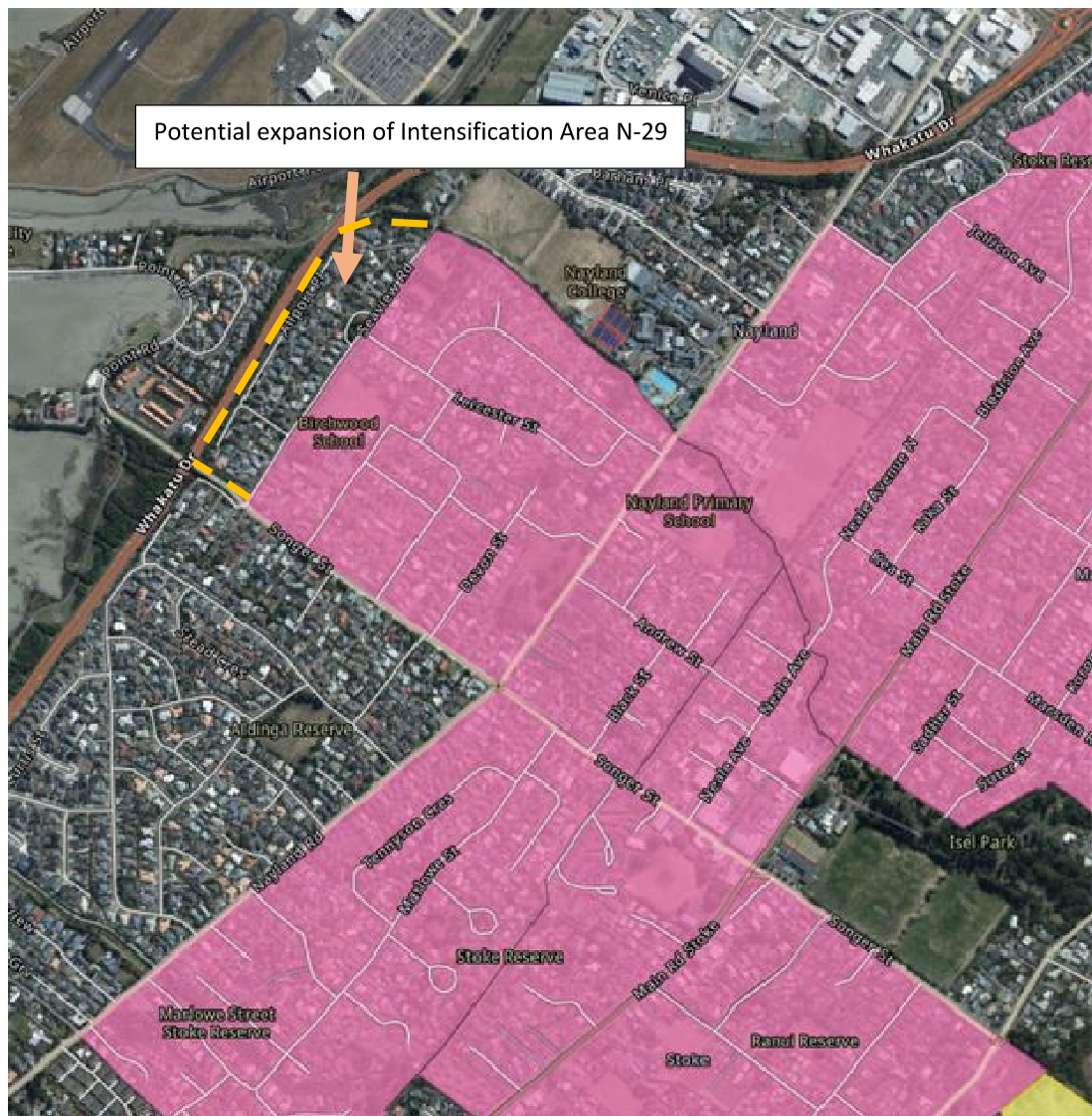


Figure One: Potential expansion of Nayland-south Intensification Area

(b) Greenfield growth:

The Proposal provides for managed greenfield expansion around Nelson, Richmond, Brightwater, Wakefield and Māpua, including opportunities for rural residential development because intensification alone is not expected to meet demand. The core proposal identifies greenfield sites close to the existing urban area so that they can easily connect with existing transport networks and services. These greenfield areas are concentrated at the urban edges of Nelson and in and around Richmond, Brightwater, Wakefield, Māpua and Motueka. These areas align with sites identified in the 2019 Nelson Tasman Future Development Strategy. However, they require further investigation owing to various development constraints, namely the retention of Tasman’s highly productive land for primary production (in the Waimea Plains), and the natural hazards that exist owing to the Regions’ susceptibility to flooding, slope instability, fire and droughts.

(c) Growth along the Corridor:



The Proposal includes a pattern of growth which is consolidated largely along the Regions' existing transport corridor (State Highway 6). Kāinga Ora supports the consolidation of growth along the Region's existing transport corridor because it provides connectivity between the centres and makes efficient use of existing infrastructure.

(d) Growth around the Centres:

Existing centres with high accessibility, such as Nelson, Stoke and Richmond could support high and medium density housing development.

40. Kāinga Ora notes that consolidation of urban growth in existing areas through intensification is more efficient (in terms of utilising existing infrastructure) and may better support well-functioning urban environments than greenfield expansion. However, Kāinga Ora appreciates that greenfield expansion (if done well) can still support the outcomes of the NPS-UD, and that consolidation and intensification alone is not expected to meet demand. Further it is recognised that the Proposal should reflect the various growth demands and development constraints that apply to the different areas across the Region.

Development Constraints

Natural Hazards

41. Large areas within the Region are susceptible to natural hazard risks which are present across large parts of the Regions' existing urban areas, proposed intensification areas and greenfield expansion areas as illustrated in the maps provided in **Appendix B**. Both Councils have various workstreams underway to manage the effects of natural hazards, including infrastructure projects and working with the community to plan for the ongoing effects of natural hazards. Such natural hazards include flooding (both coastal and river), fire, drought, inundation, tsunami, liquefaction, slope instability and fault rupture. A number of these natural hazards are impacted by the effects of climate change, including sea level rise and increased rainfall.
42. In principle, Kāinga Ora supports the location of development away from areas vulnerable to natural hazards where the risk cannot be otherwise managed, particularly those affected by climate change, including sea level rise and the need for growth areas and development to be resilient to the risks from natural hazards.
43. The Proposal explains how each Council is working with their communities towards long-term adaptive planning for sea level rise and coastal hazards⁹. These work programmes include gathering technical information, understanding what community values may be affected, assessing vulnerabilities and risks, and starting to identify options to address the impacts from sea level rise and coastal hazards.
44. The Proposal explains how the outputs of these separate work streams will be used to inform a range of Council functions including land use planning, building consenting, asset management, and civil defence and emergency management. However, the Proposal does not explain what the options to address the impacts of sea level rise and coastal hazards might be, or how the outputs from these work streams will be used to inform the Implementation Plan for the NTFDS.
45. Natural hazards and the protection of highly productive land will be major constraints when considering the location of new growth areas in the Top of the South, and as such Kāinga Ora recommends the Councils work collaboratively on their various natural hazard work streams in conjunction with the implementation plan for the NTFDS to ensure the direction and outcomes from these separate work streams are aligned. It might also wish to consider alternative options for future growth areas in case the proposed growth areas become increasingly vulnerable to natural hazards to the extent that the risk can no longer be managed.

⁹ As required by the Ministry for the Environment's 2017 Coastal Hazards and Climate Change Guidance



Highly Productive Land

46. Another key development constraint that limits future development in the Region includes the highly productive land in the Waimea plains (between Richmond and Wakefield to the south of Tasman). This land has intrinsic life-supporting value and enables food to be grown locally and more sustainably. Highly productive land is a finite resource and should be protected from subdivision and development for urban uses. Feedback from the community on the earlier FDS (in October 2021) together with feedback on other Council plans has identified a strong and consistent preference amongst the community to protect this highly productive land from inappropriate development.
47. Kāinga Ora also supports the protection of this highly productive land from inappropriate development (such as subdivision and residential development) because this land has significant value for the Regions' economy. Further, it is noted that a National Policy Statement (NPS) related to the Protection of Highly Productive Land is planned to take effect in the first half of 2022¹⁰. The Council will need to have regard to this NPS as it defines the areas for urban growth in the Region.
48. The growth and development outcomes of the NTFDS will inform the Regional Policy Statements, as well as the Tasman Environment Plan (TEP), the Whakamahere Whakatū Nelson Plan (and the specific plan changes that will give effect to the NTFDS to enable more housing). The Council's will need to have a detailed understanding of the impacts these various development constraints will have on the Regions' urban development capacity projections to ensure they can be achieved. If, for example, one or both of the Unitary Plans contain unduly onerous planning rules (to counter the Region's development constraints), then the Councils may not be able to provide for the 26,000 homes that are expected to be needed in the future.

Implementation Strategy

49. The Proposal does not include detailed timing for when the growth areas will be rolled out over the next 30 years due to the perceived need to be responsive to changing market dynamics.
50. The FDS implementation plan (updated annually) will identify and update the staging and roll out of growth areas, in response to market information and feedback, and annual monitoring results.
51. However, it was useful having an indication of the staging/sequencing for urban areas in the previous 2019 version of the NTFDS which identified a number of sites that could be made available in decades 2 and 3 of the lifetime of the FDS. Kāinga Ora would like the current proposal to provide indicative staging for the growth areas.

Economics

52. Property Economics, on behalf of Kāinga Ora, has undertaken a high-level economics review of the Proposal to provide an understanding of the information behind the development of the NTFDS and to comment of whether the resulting outcomes are likely to meet the objectives of both the NTFDS and the NPS-UD (and to what extent). The full report is included in **Appendix C** and should be read in conjunction with this submission.
53. In summary, the economics review finds several aspects of the NTFDS and the contributing reports that have led to outcomes that are considered contrary to the objectives of the NPS-UD and NTFDS which will result in an inefficient outcome for the Region.

¹⁰ <https://environment.govt.nz/acts-and-regulations/national-policy-statements/proposed-nps-highly-productive-land/>



54. It also finds that the NTFDS appears to contradict its objective of consolidation. The result of the NTFDS is likely to be much of the same greenfield expansion with this form of development dominating future growth in the Region and providing a similar position for the Councils in the future to simply supply more greenfield land as its proportional capacity is developed ahead of any significant level of increased consolidation in existing urban areas.
55. The provision of increasing capacity within greenfield locations comes at significant economic costs over the longer term impacting upon the region's competitiveness and reducing community wellbeing. This very approach is a key factor in the current NPS-UD identification of the economic costs of dispersed residential development and the need for national coordination of intensification.

Housing Affordability

56. Housing in Nelson and Tasman is considered severely unaffordable with a significant proportion of households spending more than a third of their income on housing costs. This is partly due to lower-than-average household incomes, which are 13% lower than the New Zealand average, and the second lowest in New Zealand¹¹. The Proposal states that the NTFDS cannot deliver affordable homes, rather its purpose is to set out how the Councils intend to supply land for housing and business over the next 30 years to meet demand, and how they plan to enable a range of choices, including more smaller footprint homes.
57. The Proposal does not provide any high-level directives for housing affordability in the Region, yet the NPS-UD expressly promotes planning decisions that improve housing affordability¹². Kāinga Ora notes that affordability has particular flow on impacts for providing social housing, as well as the provision of broader housing right across the 'housing continuum' and impacts the abilities of Kāinga Ora (and other social housing providers) to redevelop and modernise its existing housing portfolio. Kāinga Ora considers the Proposal should have a clearer and stronger focus on improving housing affordability in the Region.
58. There is significant potential to better use land across the Region. Kāinga Ora believes there is a considerable opportunity to redevelop its land holdings to increase the variety of housing types and free up under-utilised land for private, affordable, and third-sector housing for the benefit (social and economic wellbeing) of the whole community. The approach recommended in the NTFDS directing growth around existing urban areas and growth nodes across the Region will facilitate this redevelopment and contribute towards more efficient and sustainable use of land and a more consolidated and compact urban form.
59. The in-fill approach to growth also supports improving housing choice and affordability. In-fill redevelopment provides for a variety of smaller household types and allotment sizes and subsequently may allow for the delivery of more affordable outcomes, responding to the changing demography of the population over time.

Summary

60. Overall, Kāinga Ora generally supports the opportunities for growth and intensification presented (except for the secondary part of the Proposal which is for a new Tasman Village) and the outcomes to be achieved by the Proposal, which are:
- a) An urban form that supports reductions in greenhouse gas emissions by integrating land use and transport.

¹¹ NTFDS 2022-2052 – S14.2.2

¹² National Policy Statement on Urban Development – Part 3.23(3)(a)(i)



- b) Urban growth around the existing main centres, including Nelson City Centre and Richmond Town Centre, is consolidated and intensified, and these main centres are supported by a network of smaller settlements.
 - c) New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live.
 - d) A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable options.
 - e) Sufficient residential and business land capacity is provided to meet demand.
 - f) New infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth.
 - g) Impacts on the natural environment are minimised and opportunities for restoration are realised.
 - h) Nelson Tasman is resilient to and can adapt to the likely future effects of climate change.
 - i) Nelson Tasman is resilient to the risk of natural hazards.
 - j) Nelson Tasman’s highly productive land is prioritised for primary production.
 - k) All change helps to revive and enhance the mauri of Te Taiao.
61. The growth opportunities presented in the Proposal indicate how growth could occur in the Region. These opportunities will enable further intensification in accordance with the NPS-UD, specifically, concentrating residential development around crucial transport corridors and promoting a compact urban form. Kāinga Ora supports thriving communities that provide for affordable housing, and therefore supports the inclusion of stronger directives for affordable housing in the NTFDS.
62. Kāinga Ora is not supportive of a new Tasman Village community being established because this option has raised significant cultural concerns from local iwi (Te Ātiawa). Kāinga Ora respects the concerns Te Ātiawa has with this aspect of the Proposal and supports ongoing kōrero, engagement and hui with Te Tauihu iwi to better understand their aspirations for urban development in the Top of the South.
63. Further, the proposed option of having a new Tasman Village is not aligned with creating sustainable communities and will result in an increased reliance on the use of private motor car which in turn will increase congestion and green house gas emissions to the detriment of the environment and the Te Tauihu community. It does not represent compact and efficient urban form that is easier to service with infrastructure and is considered contrary to the objectives of the NPS-UD and NTFDS.
64. From an economics perspective, there are several aspects of the NTFDS and the contributing reports that have led to outcomes that are considered contrary to the objectives of the NPS-UD and NTFDS which will result in an inefficient outcome for the Nelson and Tasman communities. Further economic analysis of the Proposal is included in the report provided in **Appendix C**.
65. The Proposal identifies several areas suitable for medium and higher density growth. However, some of these growth areas are located on land that is subject to natural hazards, a number of which are impacted by the effects of climate change (including sea level rise and increased rainfall). To provide context, the maps provided in **Appendix B** show the future growth areas as identified in the NTFDS and the Council’s mapped natural hazard overlays. What these maps demonstrate is that a number of the proposed growth areas are subject to natural hazard risks (particularly in the case of Nelson).

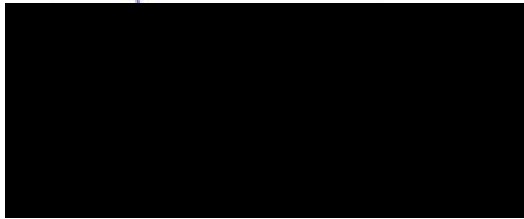


66. The Proposal does not explain what the options for building resilience to risk from these natural hazards might be, explaining that this is instead being considered separately by each Council, under separate work streams. Kāinga Ora recommends the Councils work collaboratively on their various natural hazard work streams in conjunction with their future growth and development strategies (including the Implementation Plan for the NTFDS) to ensure the direction and outcomes from these separate work streams are aligned and the urban development capacity projections can be achieved.
67. Further, the Proposal does not consider alternative options for future growth areas in the event that the proposed growth areas become increasingly vulnerable to risk from natural hazards. This is particularly important given the considerable development constraints that limit future expansion elsewhere within the Region, including the highly productive land in the Waimea plains, and the natural hazards that exist in areas close to the coast and rivers, and the steep mountain ranges to the east.
68. In relation to the Proposal's consideration of infrastructure, generally the methodology to the work undertaken looks sound, with a good, stated level of engagement with Council's asset and infrastructure engineers. Weighted attributes for infrastructure criteria have been used, with the Council's looking to leverage current investment programmes.
69. However, Kāinga Ora would like the Proposal to have stronger & clearer statements in response to the FDS key driver for integrating planning with infrastructure planning and funding. In particular, concise explanations for each growth area detailing what coverage the current Long Term Plans have in provisioning for the FDS proposal.
70. The Proposal does not provide any high-level directives for housing affordability in the Region, yet the NPS-UD expressly promotes planning decisions that improve housing affordability¹³. Kāinga Ora notes that affordability has particular flow on impacts for providing social housing, as well as the provision of broader housing right across the 'housing continuum' and impacts the abilities of Kāinga Ora (and other social housing providers) to redevelop and modernise its existing housing portfolio. Kāinga Ora considers the Proposal should have a clearer and stronger focus on improving housing affordability in the Region.
71. Kāinga Ora is generally supportive of the overall direction of the NTFDS. Those areas of most relevance to Kāinga Ora have been specifically identified within the body of this letter.
72. Kāinga Ora is interested in the detail of the NTFDS and welcomes the opportunity to discuss, engage and provide further input into the development of the Implementation Plan for the NTFDS. As a delivery partner and public housing landlord, Kāinga Ora would welcome the opportunity to work closely with the Councils to further shape the direction of growth throughout the Region.
73. Should you have any questions in relation to the matters outlined above, please do not hesitate to contact me.

Yours sincerely

¹³ National Policy Statement on Urban Development – Part 3.23(3)(a)(i)

Sensitivity: General



Jennifer Rose

Associate - Planning

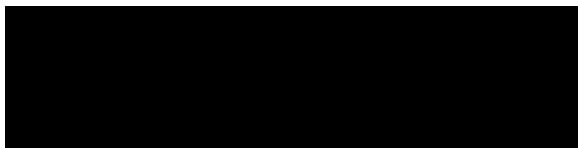


On behalf of
Kāinga Ora – Homes and Communities

Dated this 14th day of April 2022

Brendon Liggett,
Manager, Development Planning
Kāinga Ora – Homes and Communities

ADDRESS FOR SERVICE:



PROPERTY **E**ECONOMICS

Kainga Ora - Sub # 31087 - 2



TASMAN FUTURE

DEVELOPMENT STRATEGY (FDS)

ECONOMIC MEMORANDUM

Client: Kāinga Ora

Project No: 52182

Date: April 2022

52182.2



13 April 2022

MEMORANDUM

To: Kāinga Ora

[REDACTED]
Associate - Planning

Beca

RE: Economic Review of Tasman FDS for Kāinga Ora Submission

INTRODUCTION

Property Economics has been engaged by Kāinga Ora Homes and Communities (Kāinga Ora) to undertake a high-level peer review the report Nelson and Tasman Future Development Strategy (FDS), and supporting documents, from an economic perspective as an input into the development of Kāinga Ora's broader Tasman FDS submission.

This review is not intended to represent an exhaustive list of economic issues Property Economics has with the FDS or base documents, but some of the more influential higher-level queries. The proposes of this review is provide understanding of the information behind the strategy's development and to comment of whether the resulting outcomes are likely (and to what extent) to meet the objectives of both the FDS and the NPS UD¹.

REVIEW

The overall propose of the FDS is to provide a structure for (in the case of this review) estimated residential growth in a manner that meets the overall objective of a consolidated and efficient urban form. Feedback from the community in relation to growth management included *'Preference for intensification of housing (building up) over greenfield expansion, particularly as it relates to the protection of highly productive land and accessibility but noting greenfield expansion is still necessary to meet expected demand.'*

There were several key documents that informed the development of this strategy including the Nelson / Tasman Housing and Business Capacity Assessment (HBA) as well as a report by Sense Partners in 2020 titled *'Understanding the impacts of releasing greenfield sites for development'*.

¹ National Policy Statement on Urban Development 2020

52182.2



There are several aspects of the FDS and the contributing reports that have led to outcomes that Property Economics considers are contrary to the NPS UD and stated FDS objectives that will result in an inefficient outcome for the Nelson and Tasman communities.

Growth Estimates

There are two simple approaches to estimating growth patterns within the Nelson / Tasman area, these are essentially based on either historical trends or the distribution of growth that would meet the identification of efficient patterns in the strategy and the plan.

Following historic growth patterns as part of future growth management leads to familiar outcomes. It would appear in providing for this growth the residential projections are self-fulfilling, identifying past growth patterns and planning for the future in the Nelson / Tasman context will result in an identified need to be met by the expansion of greenfield capacity.

This is evident in the fact that the majority of growth is provided for in Tasman District by way of greenfield development with significantly smaller growth in Nelson accommodated by way of intensification.

Supply Led Competitiveness

The Sense Partners report of April 2020 illustrated the nature of this discrepancy indicating in its conclusion (p.3 page 27) that 'cutting back' the provision of greenfield land would likely result in a fall in the areas competitiveness pushing demand to other areas of NZ.

While this may be true, in the short-term, the provision of increasing capacity within greenfield locations comes at significant economic costs over the longer term impacting upon the region's competitiveness and reducing community wellbeing. This very approach is a key factor in the current NPS UD identification of the economic costs of dispersed residential development and the need for national coordination of intensification.

Feasibility Rates and Development

The development of identification of feasible residential capacity within the FDS is a crucial factor is providing for growth within existing urban areas. The HBA undertaken by Sense Partners outlines the process followed to assess both theoretical and feasible capacity. The process for comprehensive redevelopment appears to be based on a 0.58 ratio of land value to total capital (land plus improvement) value, while it is unclear how infill development has been assessed.

As identified in the HBA report itself there are several shortcomings to this approach, with out-of-date valuations as well as changing typologies and densities altering the relativity of this ratio. Overall, this approach is likely to have underestimated feasible capacity within the urban area, in particular the potential capacity that exists in Nelson City.

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An issue that potentially arises from this more rudimentary approach is the fact that the HBA does not seem to consider capacity by typology, meaning reconciliation with identified demand is difficult.

Lack of Understanding of Intensification Drivers

A concerning driver of the FDS is found in the Sense Partners 2020 greenfield report which finds that *'continuing to release greenfield land for development also pushes down prices of land within existing urban areas, facilitating some intensification'*.

The fundamentals behind the first part of the statement are clear, an increase in competing capacity is likely to reduce the price (to differing degrees) of residential land generally. However, the statement then goes on to say that this price fall will facilitate intensification which is confusing.

The relative value of residential land is a key component in the propensity for the market to develop more intensive properties. The relation is actually fundamental to the approach adopted by Nelson / Tasman in their HBA where the ratio of land value to capital value is utilised as a proxy to identify feasibility. Any property with a ratio under 0.58 is considered unlikely to be redeveloped at higher density. The nature of increased greenfield capacity and its impact on reducing land prices would in turn lower this ratio and render additional properties unlikely to be redeveloped.

The potential impact of price on intensification is identified in the Ministry of Housing and Urban Development's publication 'Understanding and implementing intensification provisions for the NPS-UD'. Page 38 of this document highlights areas of high land value and low improvement value (or capitalisation) as signalling increased potential for intensification and redevelopment.

The inverse of this on the market in general is likely to result from increased greenfield supply, redirecting potential urban demand, lowering prices, and impacting directly on the feasibility of intensified residential development.

The level of greenfield development capacity not only provides for potential inefficient residential development, but directly impacts not only on the feasibility of brownfield development but also the realisation of this intensification.

While feasibility is a key concern regarding consolidated residential activity, so too is the realisation of that development. So not only does increased greenfield supply have the potential to lower brownfield feasibility rates, but it also increases the level of competition and impacts on the realisation rate of the reduced feasible capacity.

Intensification and Affordability

As above a driving factor in the release of greenfield land appears to be affordability. The Sense Partners report identifies the role land values have on increasing house prices with the area. This is

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a fundamental issue across the country that is likely to require a number of changes in the local and national environment to address.

An argument for increased greenfield capacity is that this increased supply will lower land values and provide for affordable housing. There are two issues that this argument does not seem to consider. The first is the empirical results of Councils releasing proportionate (to population) greater amounts of greenfield development with very limited impact on property prices (in fact in most areas the final product value general far exceeds the existing property prices).

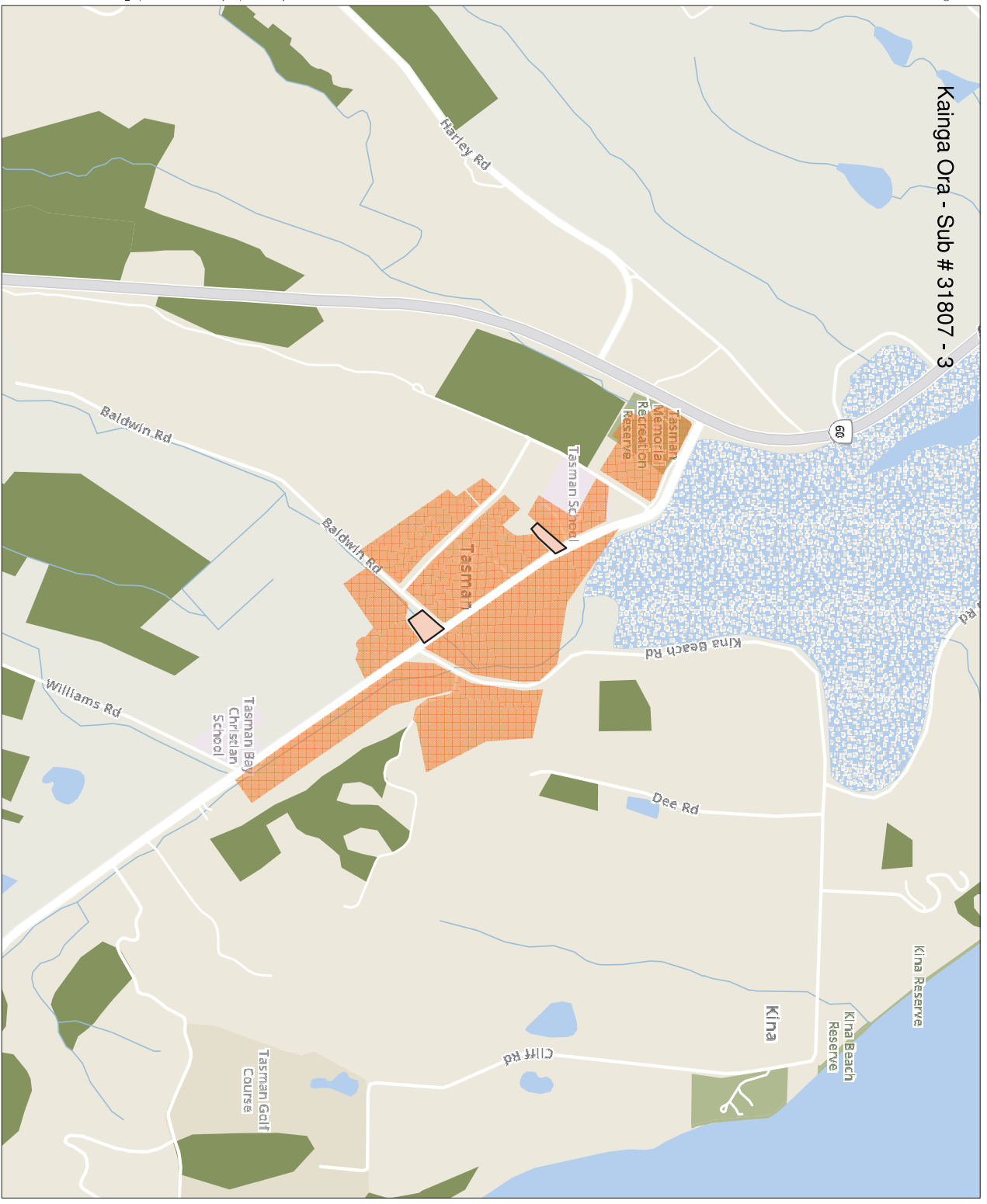
Secondly, increasing land areas is not the only avenue to impact upon the land price component of residential property. As identified in the NPS UD increasing the development capacity within existing urban areas has the potential (when weighed careful against competing greenfield capacity) to decrease the cost of land per unit (while increasing the value of land per square metre). In many cases this approach to increasing capacity not only impacts upon affordability but on the cost of living, increasing residential efficiencies, access to infrastructure, amenity, and employment opportunities.

Overall, the outcome of the Nelson / Tasman FDS seems to contradict its objective of consolidation. The result of the FDS is likely to be much of the same greenfield expansion with this form of development dominating future growth and providing a similar position for Council in the future to simply supply more greenfield as its proportional capacity is developed ahead of any significant level of increased consolidation in existing urban areas.

If you have any queries, please give me a call.

Kind Regards

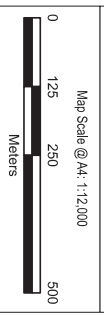
Phil Osborne



Residential Areas Suitable for Intensification
Tasman Village

- Residential Areas suitable for Intensification
- Medium Density
- Nelson Tasman Commercial Zoning
- Commercial

This map contains data derived in part or wholly from sources provided by the Tasman District Council. The Tasman District Council and Becca as to the accuracy or completeness of this information. Scale may be incorrect when printed. Contains information sourced from Tasman District Council, Eagle Technology, LINZ, StatsNZ, NIWA, Natural Earth, © OpenStreetMap contributors, Crown Copyright Reserved.

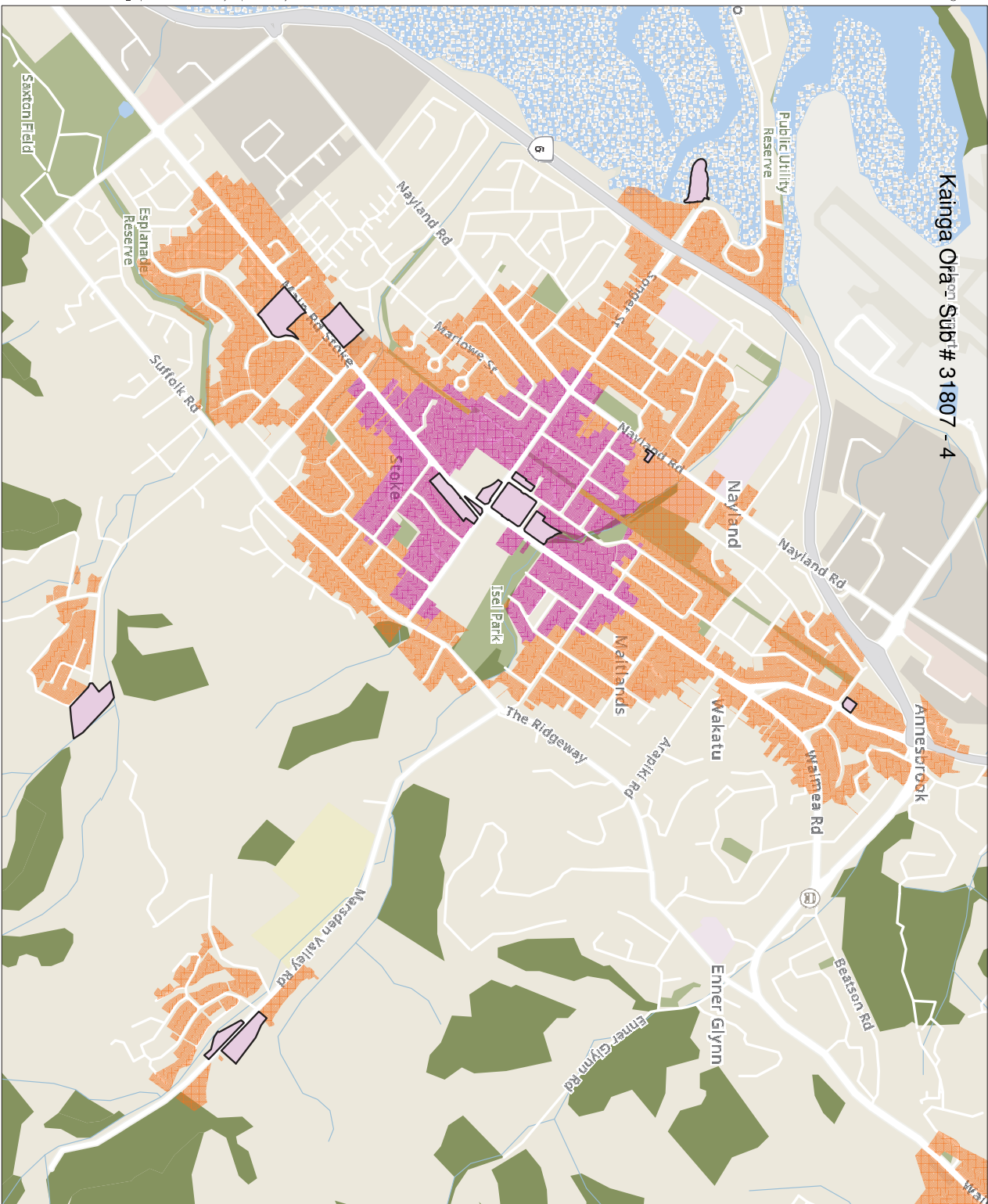


Author	Date	Version	Approved	Drawn

Client	Project	Discipline
Kainga Ora	Nelson Tasman Future Development Strategy Review	GIS

Project: Nelson Tasman Future Development Strategy Review

Drawing No: DR-4264819-03



Residential Areas Suitable for Intensification
Stoke

- Nelson Tasman Commercial Zoning
- Suburban Commercial
- Residential Areas Suitable for Intensification
- High Density
- Medium Density

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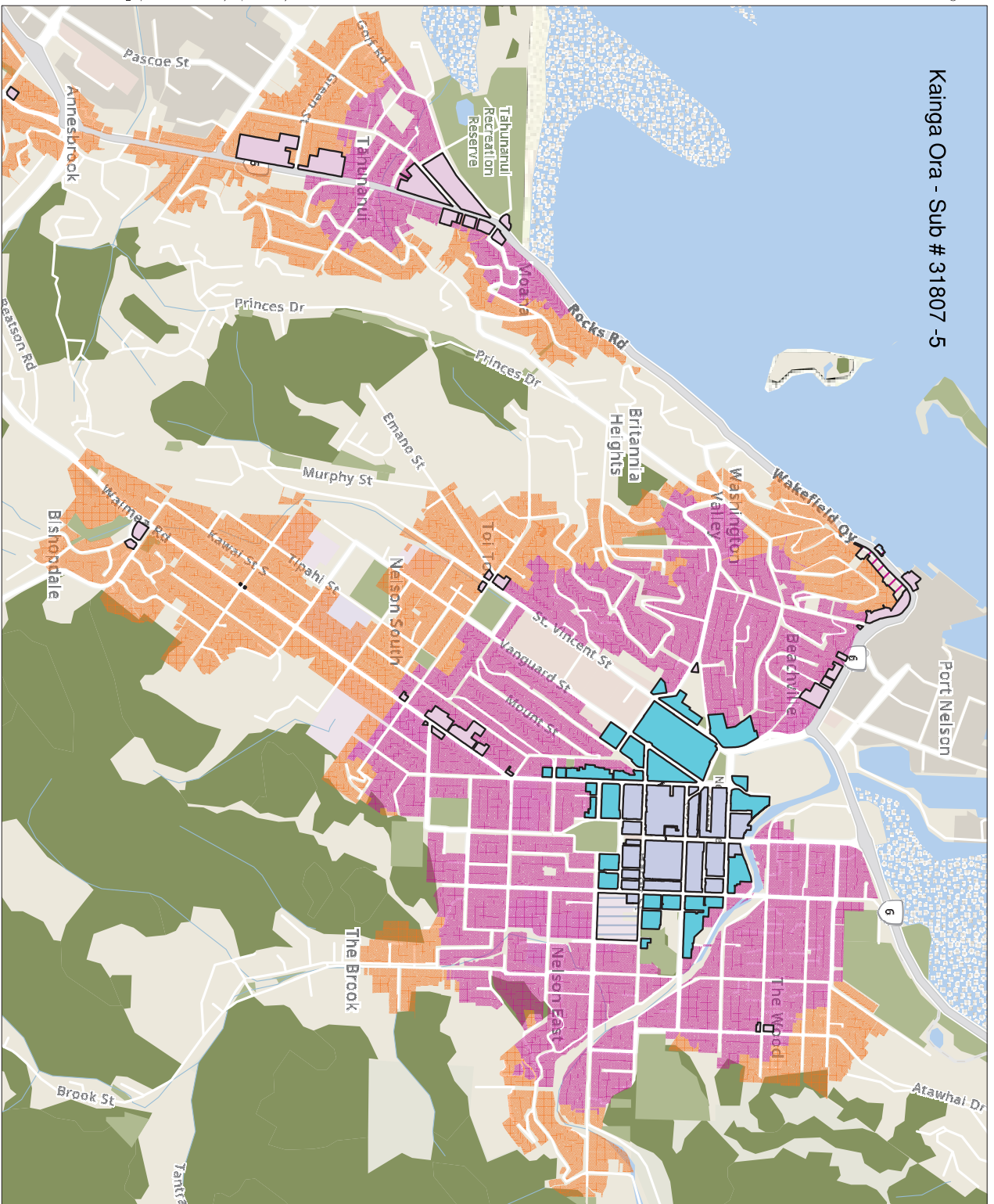


Revision	Date	Version	Approved	By
1	14/03	1	BAK	JAZ
2	14/03	2	BAK	JAZ

Client:	Kainga Ora	Designer:	GIS
Project:	Nelson Tasman Future Development Strategy Review	Drawing No:	GIS-45819-04



Kainga Ora - Sub # 31807 -5



FDS Submissions Received – Section 4 - 31807 Jennifer Rose - Kainga Ora

Residential Areas Suitable for Intensification Nelson City & Tahunanui

- Nelson Tasman Commercial Zoning
- Commercial Leisure Area
- Inner City - Centre
- Inner City - Fringe
- Inner City - Intense Development
- Suburban Commercial
- Residential Areas Suitable for Intensification
- High Density
- Medium Density

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Map Scale @ A4: 1:24,000

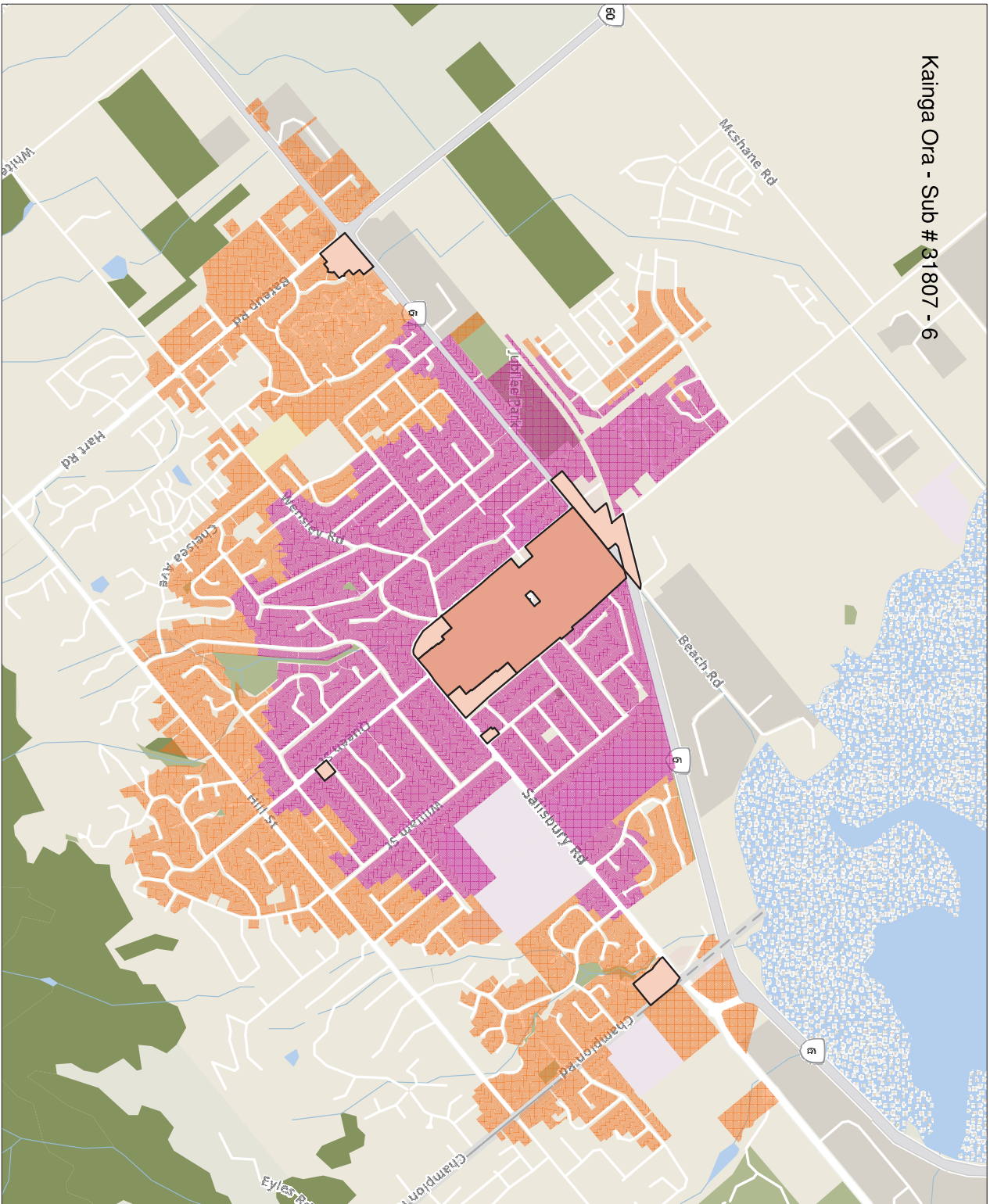
0 125 250 500 Meters

Author	Date	Version	Approved	Box

Client	Project	Drawn by
Kainga Ora	Nelson Tasman Future Development Strategy Review	GIS

Project: Nelson Tasman Future Development Strategy Review
Drawing No: DR-4581945

Kainga Ora - Sub # 31807 - 6



Residential Areas Suitable for Intensification
Richmond

- Nelson Tasman Commercial Zoning
- Central Business
- Commercial
- Residential Areas Suitable for Intensification
- High Density
- Medium Density

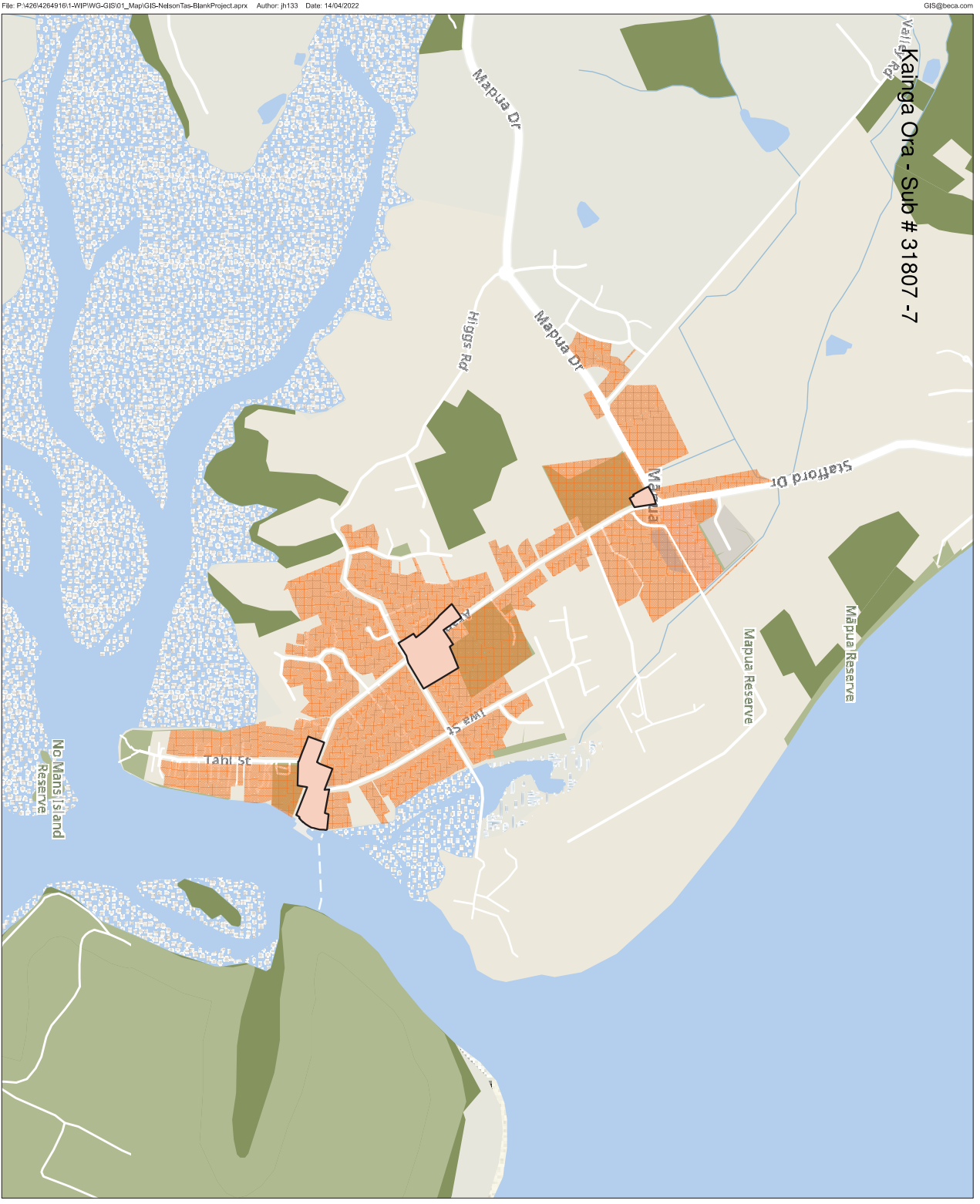
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Revision	Author	Version	Approved	Date
1	JHR	0001	JHR	14/04/2022

Client:	Kainga Ora	Designer:	GIS
Project:	Nelson Tasman Future Development Strategy Review	Drawing No:	DR-45819-01





Residential Areas Suitable for Intensification

Mapua

- Residential Areas Suitable for Intensification
- Medium Density
- Nelson Tasman Commercial Zoning
- Commercial

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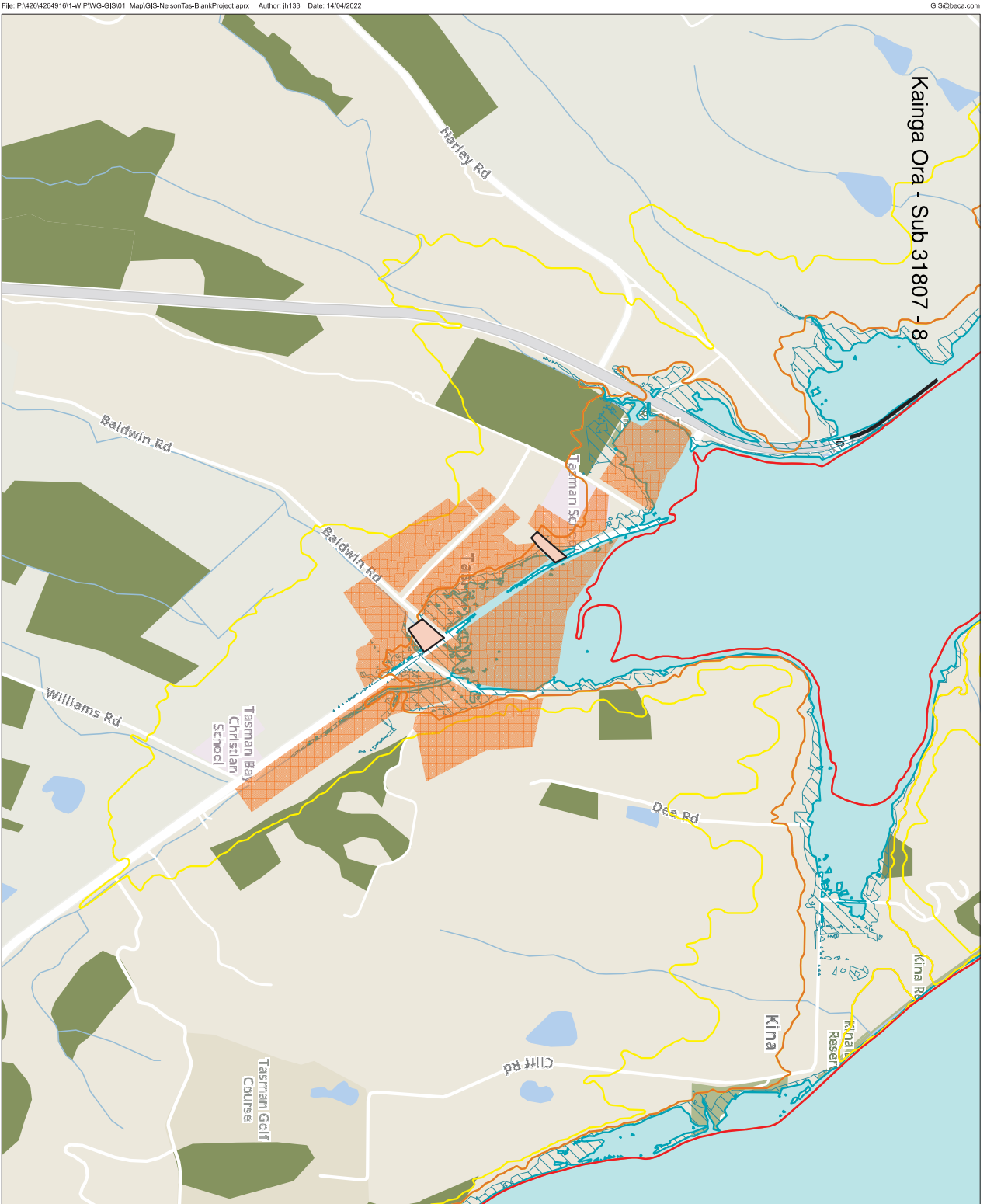
Map Scale @ A4: 1:15,000

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Meters

Region	Atairi	Waikato	Bay of Plenty	Waikato	Bay of Plenty
1					
2					
3					
4					
5					
6					
7					

Client: **Kainga Ora** Discipline: **GIS**

Project: **Nelson Tasman Future Development Strategy Review** Drawing No: **DR-45891642**



Residential Areas Suitable for Intensification
Hazard Maps - Tasman Village

- Residential Areas Suitable for Intensification
 - Medium Density
- Nelson Tasman Commercial Zoning
- Commercial
- Tsunami Evacuation Zones
 - Red
 - Orange
 - Yellow
- Coastal Protection Structures
 - Causeway
 - Tasman 2.0m SLR scenario
 - MHWs
 - 1% AEP Storm-tide

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Map Scale @ A4: 1:12,000

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Meters

Author	Date	Version	Approved	Drawn

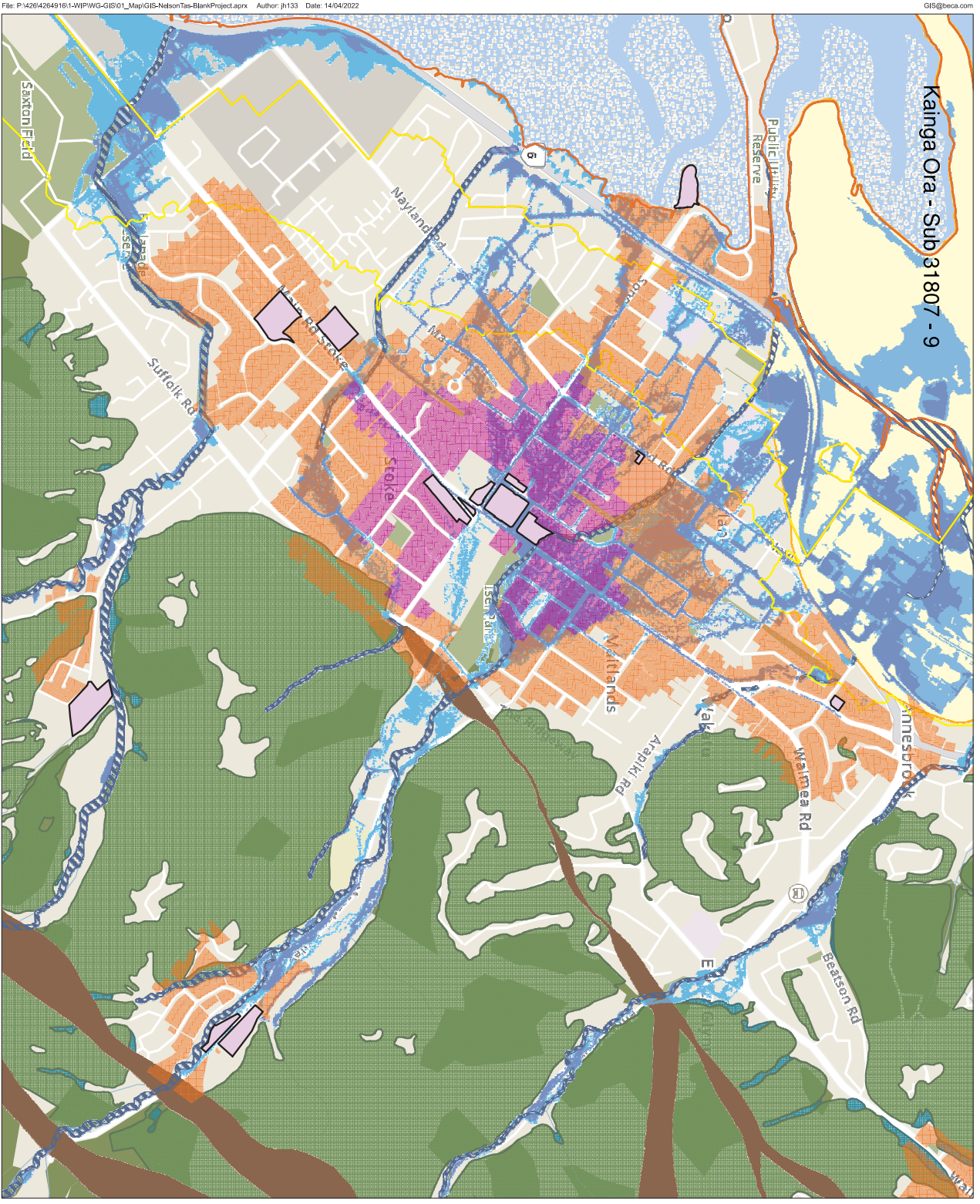
Client: **Kainga Ora**

Dissemination: **GIS**

Project: **Nelson Tasman Future Development Strategy Review**

Drawing No: **DR-458918-03**





Residential Areas Suitable for Intensification Hazard Maps - Stoke

Residential Areas Suitable for Intensification

- High Density
- Medium Density
- Nelson Tasman Commercial Zoning
- Suburban Commercial
- Tsunami Evacuation Zones
- Red
- Orange
- Yellow
- Natural Hazards
- River Flooding Present Day Event
- River Future Flooding Event (up to the year 2130)
- Floodway
- Liquefaction
- Fault Hazard Corridor
- Slope Instability Overlay Zone
- Slope Instability Run-out Hazard Zone
- Slope Instability Hazard Zone

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Map Scale @ A4: 1:20,000

0 125 250 500 Meters

Author	Date	Version	Approved	Drawn

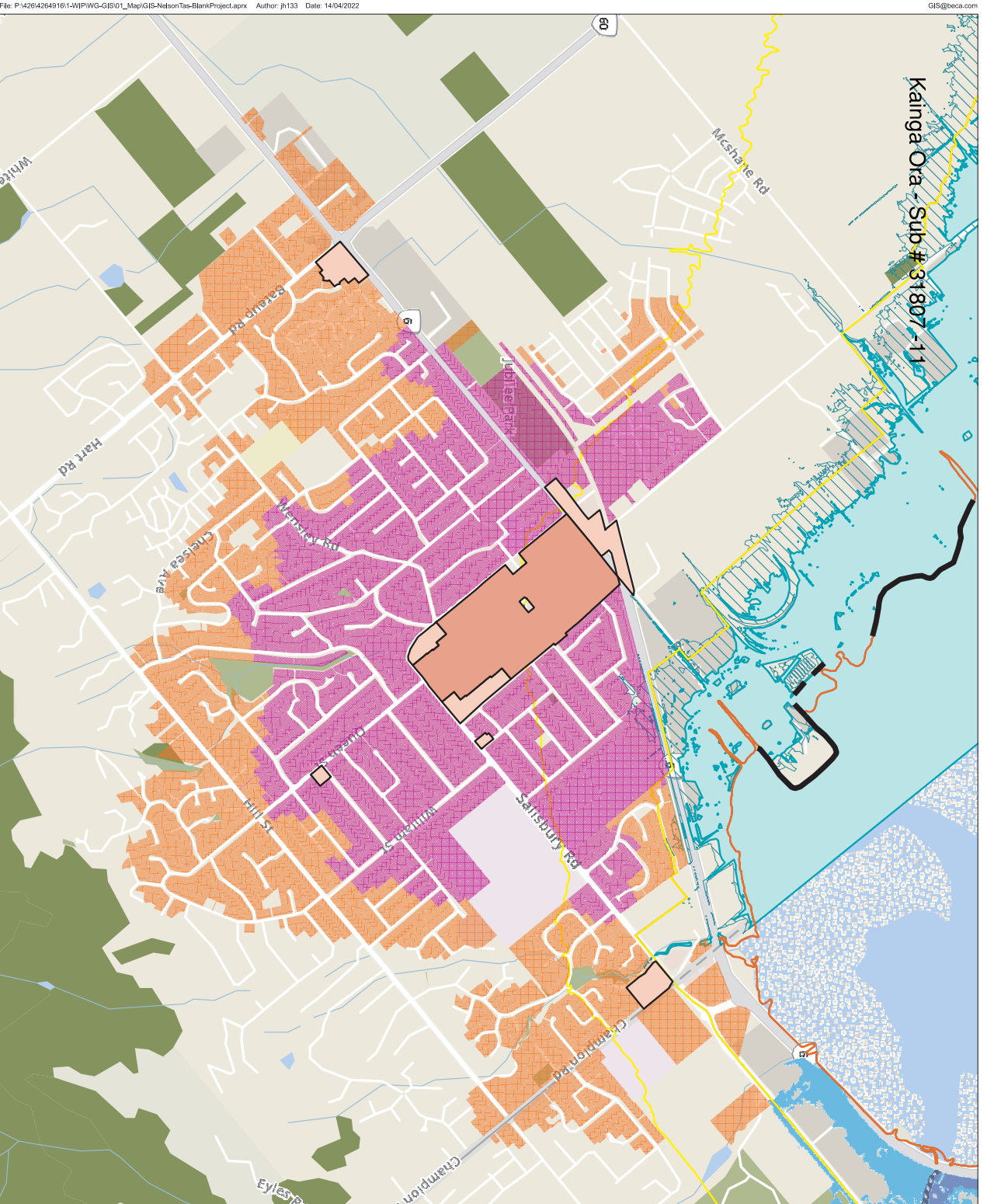
Client: **Kainga Ora**

Drawn by: **GIS**

Project: **Nelson Tasman Future Development Strategy Review**

Drawing No: **GIS-458918-04**





Residential Areas Suitable for Intensification Hazard Maps - Richmond

Residential Areas Suitable for Intensification

- High Density
- Medium Density
- Nelson Tasman Commercial Zoning
- Central Business
- Commercial
- Tsunami Evacuation Zones
- Red
- Orange
- Yellow

Coastal Protection Structures

- Bunds or stopbank
- Retirement or wall

Natural Hazards

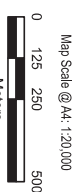
- River Flooding Present Day Event
- River Future Flooding Event (up to the year 2130)

Tasman 2.0m SLR scenario

- Floodway
- 1% AEP Storm-tide
- MHWS

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Map Scale @ A4: 1:20,000

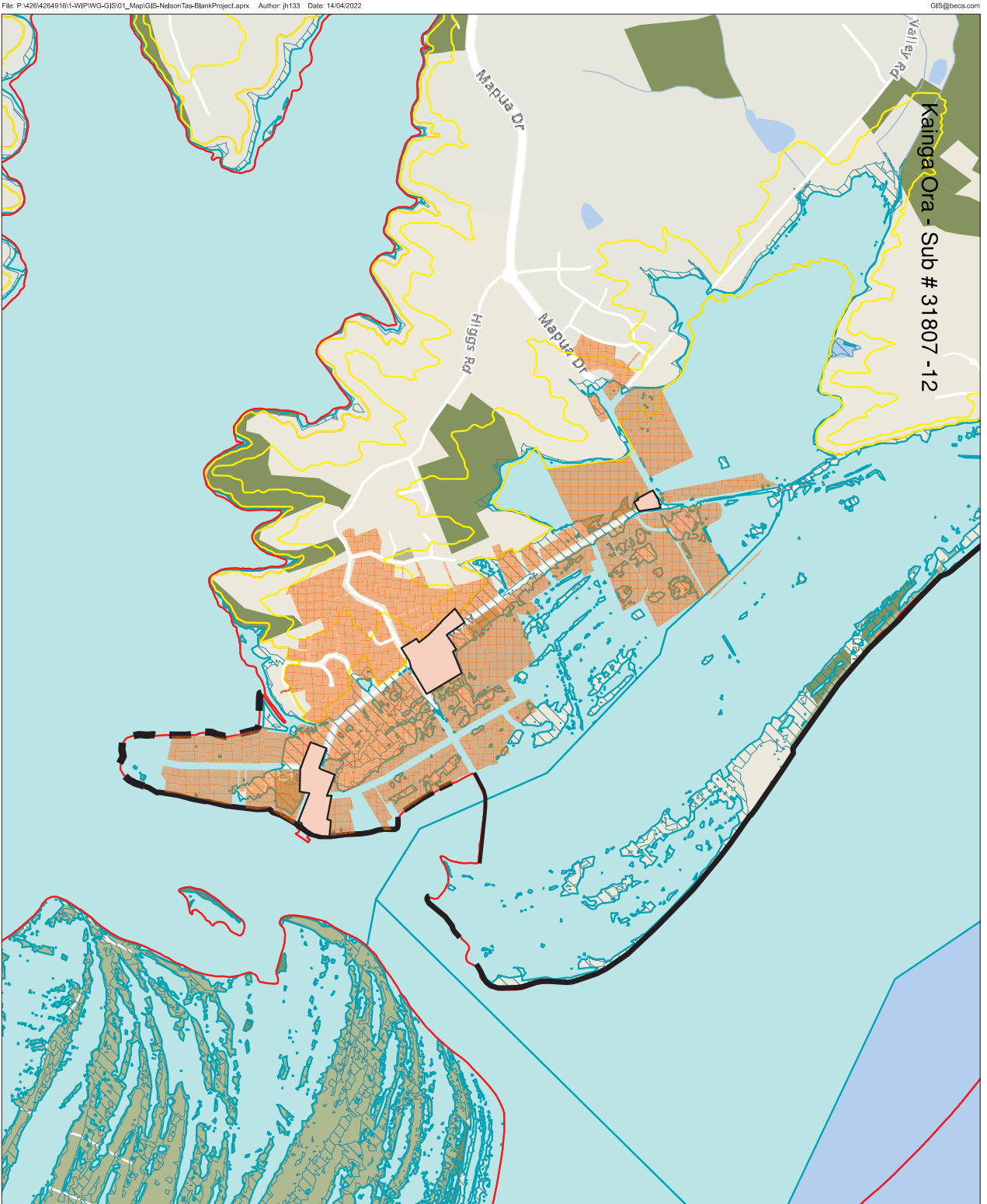


Revision	Date	Version	Approved	Drawn
1	14/03/2022	0001		
2	14/03/2022	0002		

Client: Kainga Ora
 Designer: GIS

Project: Nelson Tasman Future Development Strategy Review
 Drawing No: GIS-45819-01

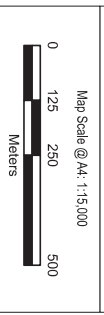




Residential Areas Suitable for Intensification Hazard Maps - Mapua

- Residential Areas suitable for Intensification
 - Medium Density
 - Nelson Tasman Commercial Zoning
 - Commercial
 - Tsunami Evacuation Zones
 - Orange
 - Red
 - Yellow
- Coastal Protection Structures
 - Intermittent rock
 - Reinment or wall
 - Causeway
- Tasman 2.0m SLR scenario
- 1% AEP Storm-tide

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Revision	Date	Version	Approved	By
1	14/03/2022	0001		
2	14/03/2022	0002		

Client:	Kainga Ora	Discipline:	GIS
Project:	Nelson Tasman Future Development Strategy Review	Drawing No:	GIS-45891842



Submission Summary

Nelson Tasman Future Development Strategy – Submission #31808

Ben Williams
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>See attachment.</p> <p>Radio New Zealand Limited (RNZ) welcomes the opportunity to provide feedback on the Draft Nelson and Tasman Future Development Strategy (the Draft Strategy).</p> <p>RNZ's facilities in the Nelson Region are located within the Saxton Field Reserve, Main Road, Stoke (the Facilities). The Facilities include a 53 metre guyed aerial mast and other equipment.</p> <p>It is important that the Draft Strategy have regard to the Facilities in a way that ensures RNZ can continue to undertake daily operations, maintenance and upgrades of its Facilities as required, so that RNZ can continue to carry out its functions as a lifeline utility.</p> <p>RNZ is cognisant that its Facilities at Stoke are already to some extent, in close proximity to a range of residential development and it is in no way seeking to unreasonably restrict urban development in Stoke. However the identification of greenfield development sites in Stoke (including N-011) increases the likelihood of extensive new development near the Facilities, and correspondingly increasing risks.</p>

Radio New Zealand Ltd - Sub 31808 - 1

FEEDBACK BY RADIO NEW ZEALAND LIMITED ON THE DRAFT NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022

To Nelson City Council and Tasman District Council

Introduction

1 Radio New Zealand Limited (*RNZ*) welcomes the opportunity to provide feedback on the Draft Nelson and Tasman Future Development Strategy (the *Draft Strategy*).

RNZ's Background

2 RNZ is a Crown entity established under the Radio New Zealand Act 1995. RNZ owns and operates radio transmission facilities across New Zealand.

3 It is important that the continued operation, maintenance and improvement of RNZ's national transmission network can occur unimpeded. RNZ's facilities are an integral and important part of RNZ's national communication network. It is appropriate that the Draft Strategy has regard to RNZ's activities.

4 RNZ's facilities perform an important role in, among other things, providing news and information to the public, but also in performing a national civil defence role. Radio is a key communication tool in the event of natural disasters and RNZ is designated as a Lifeline Utility under the Civil Defence Emergency Management Act 2002.

RNZ facilities at Stoke

5 RNZ's facilities in the Nelson Region are located within the Saxton Field Reserve, Main Road, Stoke (the *Facilities*). The Facilities include a 53 metre guyed aerial mast and other equipment. Figure 1 below shows the approximate location of the Facilities:



Figure 1: Approximate location of RNZ's Facilities at Stoke show by a red cross.

- 6 These Facilities broadcast multiple radio programmes (and carry out civil defence functions) to Nelson and surrounding areas. The rest of the facility consists of underground wires and cables.
- 7 The Facilities are designated (DR1, DRN2) for "radiocommunication, telecommunication and ancillary purposes" in the Operative Nelson District Plan. The underlying zone of the site is Open Space Recreation.
- 8 It is important that the Draft Strategy have regard to the Facilities in a way that ensures RNZ can continue to undertake daily operations, maintenance and upgrades of its Facilities as required, so that RNZ can continue to carry out its functions as a lifeline utility.
- 9 RNZ's transmitters across the country are particularly susceptible to reverse sensitivity effects and it is critically important that these effects, which have the ability to significantly restrain RNZ's operations, are avoided.
- 10 RNZ's primary concern is that residential intensification in proximity to its Facilities could lead to adverse reverse sensitivity effects on its Facilities. Reverse sensitivity effects are adverse effects that a new (or intensified) 'sensitive' land use can have on existing activities. For example:
 - 10.1 Residents might not be happy about being able to see large radio masts from their houses.
 - 10.2 Nearby residents might not be happy that, on the occasions it is used, RNZ's back-up generator makes a certain amount of noise. In high winds, the mast itself may also generate noise.
 - 10.3 RNZ has had direct experience of people, who live near some of its sites, complaining about interference to their electronic devices after they have purchased land and built a house near a transmitter (television reception and, potentially, broadband, telephone signals, burglar alarms and intercom units can be adversely affected near a transmitter).
 - 10.4 Residential developers of adjacent properties, in RNZ's experience, do not widely understand the importance of compliance with relevant electro-magnetic radiation (EMR) regulations. There is a risk structures will be constructed that do not meet these regulations, which can be dangerous to both construction staff and occupants of those structures.
- 11 RNZ has in the past had to relocate transmitter facilities as a result of increased complaints from new residents moving in around its facilities. This is a last resort for RNZ and is extremely disruptive and costly.
- 12 It is therefore important that the Draft Strategy considers and recognises RNZ's Facilities at Stoke, and ensure that these are protected from future, and possibly detrimental, reverse sensitivity effects.

The risk of electromagnetic radiation in proximity to RNZ facilities
- 13 The effects of EMR from the RNZ's transmitter masts are not well understood across New Zealand.
- 14 While the radiation from the masts is non-ionising and not harmful to humans at a cellular level, it can induce dangerous voltages / EMR levels into nearby tall metallic

- objects such as building framing, wiring, plumbing, and roof structures. This is also known as EMR coupling.
- 15 RNZ manage the very high EMR levels present close to the mast, and protect the public and workers from these, in line with current NZ and international radiation standards.
- 16 However, structures outside RNZ's immediate control but in close proximity to the masts are also potentially subject to EMR coupling and need to be managed carefully.
- 17 The risk is that developers of adjacent properties may unknowingly design and build structures which do not meet NZ EMR regulations and are dangerous to both construction staff and occupants of those structures.
- 18 The risk of EMR coupling between RNZ masts and other structures is directly related to how far the structure is from the mast and the vertical height of the structure, along with the strength of the signal. For example, elsewhere at other RNZ sites it has been determined that:
- 18.1 Structures greater than 10m in height within 500m of the mast **will most likely** result in EMR levels exceeding public limits. This could result in shocks and/or burns from contact with large metallic objects, including temporary structures like cranes. This is a significant health and safety risk to workers and the public.
- 18.2 Structures greater than 10m in height between 500m and 1km of the mast **may** result in EMR levels exceeding public limits which again could result in shocks and/or burns from contact with large metallic objects.
- 19 As such, RNZ regularly participate in planning processes to ensure that these risks are recognised within the planning framework and managed appropriately.

The Draft Strategy

- 20 RNZ is cognisant that its Facilities at Stoke are already to some extent, in close proximity to a range of residential development and it is in no way seeking to unreasonably restrict urban development in Stoke. However the identification of greenfield development sites in Stoke (including N-011) increases the likelihood of extensive new development near the Facilities, and correspondingly increasing risks.
- 21 In this respect, RNZ's feedback on the Draft Strategy is focussed on ensuring that any development of greenfield sites and intensification of existing residential land proposed to be enabled by the Draft Strategy, should be tempered to ensure such development is capable of being integrated alongside the Facilities and not result in reverse sensitivity and/or health and safety effects.
- 22 RNZ therefore seek the following changes be made to the Draft Strategy:
- 22.1 If possible, avoid any development within 1km of the transmitter mast. If this is not possible then:
- (a) Prevent any structures greater than 10m in height within 500m from the transmitter mast; and
- (b) Ensure the design of any structures greater than 10m in height within 500m and 1km of the transmitter mast requires a site-specific and

construction material-specific EMR assessment is undertaken (including any temporary structures such as cranes).

- 23 It is noted that RNZ assumes construction of any significant infrastructure of a significant height beyond 1km of the transmitter mast (such as power pylons, cell towers etc) will conduct an EMR assessment as a matter of course. Generally major infrastructure industries are aware of and manage their own EMR risks.
- 24 It is however emphasised that the distances set out in paragraphs 22 to 23 above are based on other RNZ sites and are likely to be conservative for its Facilities at Stoke. Should the Council consider the distances proposed challenging for the wider outcomes sought in relation to the Draft Strategy then RNZ is willing to work constructively with the Council to develop a set of controls that would reflect the particular attributes of the Stoke site and appropriately protect everyone's interests.
- 25 RNZ would like the opportunity to be heard at the hearing for the Draft Strategy.

Signed for and on behalf of Radio New Zealand Limited by its solicitors and authorised agents, Chapman Tripp



Ben Williams
Partner
14 April 2022

Address for service:

Radio New Zealand Limited
c/- Ben Williams / Annabelle Lee
Chapman Tripp



Submission Summary

Nelson Tasman Future Development Strategy – Submission #31809

Mr Andrew Spittal

Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	03 Please indicate whether you support or do not support Outcome 3: New housing is focussed in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice:	Don't know	Mapua is a very popular place to live given that it is conveniently located between Motueka and Richmond, and with a lot to offer in terms of amenities and lifestyle. The qualities of this environment, coupled with its location, as such that the FDS 2022 should provide for its growth to meet the growing needs and demands.
TDC - Environment and Planning	04 Please indicate whether you support or do not support Outcome 4: A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable	Disagree	Not all of the preferred options selected to provide for growth in the draft FDS 2022 are able to deliver a range of housing choices. The land at 49 Stafford Drive provides this opportunity, demonstrated in the Concept Masterplans attached to this submission. This masterplan shows three different housing typologies of: - 500-650m2 - 350-400m2; and - 180-250m2 This layout has been preferred using best practice urban and landscape design principles. Importantly, as

	options. Please explain your choice:		outlined below I response to other key outcomes of the draft FDS 2022, this also achieves a number of the other high-level objectives.
TDC - Environment and Planning	05 Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand. Please explain your choice:	Disagree	It is submitted that it is not adequate to only aim to provide "sufficient" residential (and business land). What we have learnt over the last 5 years is that the region has fallen well behind on meeting needs for housing, which has had a significant detrimental impact on the cost of housing. Outcome 5, as drafted, will not therefore adequately address the matter of affordability. The only way to address housing affordability to ensure there is ample supply. The property at 49 Stafford Drive should therefore be included in the FDS 2022. This site provides a valuable contribution to meeting needs while also, importantly, achieving a number of the other Outcomes.
TDC - Environment and Planning	06 Please indicate whether you support or do not support Outcome 6: New infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth. Please explain your choice:	Neutral	Mapua has recently upgraded its water and wastewater reticulation and capacity and those systems should now benefit those with the catchment able to be serviced (and rated) for that upgraded infrastructure. Any use of this water supply outside of the supply catchment would be an inefficient use of this water resource. Confirming 49 Stafford Drive as a part of the FDS 2022 will positively achieve Outcome 6.
TDC - Environment and Planning	07 Please indicate whether you support or do not support Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice:	Strongly agree	A central feature of the concept masterplan for 49 Stafford Drive is the provision for stormwater retention and wetland enhancement, with significant beneficial impacts on the natural environment. Combined with walkway/cycleway linkages, these areas will become blue/green assets with long term benefits to the community.
TDC - Environment and Planning	08 Please indicate whether you support or do not support Outcome 8: Nelson Tasman	Agree	Planning for natural hazards and climate change go hand in hand. The subject site not only provides for intensification of elevated land zoned for residential growth, but also provides for residential growth on the valley

	is resilient to and can adapt to the likely future effects of climate change. Please explain your choice:		floor that would be developed above the flooding risks.
TDC - Environment and Planning	09 Please indicate whether you support or do not support Outcome 9: Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice:	Agree	Planning for natural hazards and climate change go hand in hand. The subject site not only provides for intensification of elevated land zoned for residential growth, but also provides for residential growth on the valley floor that would be developed above the flooding risks.
TDC - Environment and Planning	10 Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice:	Neutral	The land at 49 Stafford Drive is not highly productive land and so this residential growth option achieves Outcome 10.
TDC - Environment and Planning	11 Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice:	Neutral	The concept masterplan has been designed with an intention to generate positive outcomes to freshwater and terrestrial environments. These intentions have been shared with iwi who have signalled their broad support for this proposal.
TDC - Environment and Planning	13 Do you support the proposal for consolidated growth along SH6 between Atawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of	Neutral	While this is a greenfield development, a large part of this site is already zoned for residential development (the hill block) with the balance immediately adjoining this existing zoning. The subject site at 49 Stafford Drive therefore is not remote from the Mapua village and would in many ways consolidate growth as per Outcome 13.

	intensification, greenfield expansion and rural residential housing. Please explain why?		
TDC - Environment and Planning	14 Where would you like to see growth happening over the next 30 years? Please list as many of the following options that you agree with: (a) Largely along the SH6 corridor as proposed (b) Intensification within existing town centres (c) Expansion into greenfield areas close to the existing urban areas (d) Creating new towns away from existing centre (please tell us where) (e) In coastal Tasman areas, between Mapua and Motueka (f) In Tasman's existing rural towns (g) Everywhere (h) Don't know		It is important for a wide range of growth options to be provided for as not everyone has the same needs and preferences. This land at 49 Stafford Drive also has the benefit of meeting a range of needs and preferences.
TDC - Environment and Planning	21 Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?	Strongly agree	The intensification of Mapua is supported for the reasons outlined above. This provides for a more efficient use of land and infrastructure in close proximity to services and amenities
TDC - Environment and Planning	28 Do you agree with the location and scale of proposed greenfield housing areas in Māpua? Please	Disagree	Oppose in part. The subject land at 49 Stafford Drive is not currently included in the draft FDS 2022 and it is submitted it should be. This site achieves many of the other key Outcomes and scores higher than other identified greenfield options.

	explain why.		
TDC - Environment and Planning	30 If you don't think we have the balance right, let us know what you would propose. Tick all that apply.	More greenfield expansion	
TDC - Environment and Planning	29 Do you think we have got the balance right in our core proposal between intensification and greenfield development? (Approximately half intensification, half greenfield for the combined Nelson Tasman region.)?	Disagree	
TDC - Environment and Planning	31 Do you support the secondary part of the proposal for a potential new community near Tasman Village and Lower Moutere (Braeburn Road)? Please explain why.	No	No we do not support a village in Tasman, particularly if that involves taking valuable reticulated water supply away from Mapua.

April 14, 2022

To: Tasman District Council futuredevelopmentstrategy@tasman.govt.nz

From: :

Submission on the draft Future Development Strategy 2022

We have recently purchased _____ comprises the 18ha of deferred residentially zoned land and also 30ha of Rural 1 land (unproductive) on the valley floor with a long frontage to Stafford Drive.

Attached to this submission is a comprehensive masterplan showing the manner in which this property could significantly contribute to achieving a wide range of community, social, recreational, cultural, and environmental objectives, including helping TDC meet its statutory obligations to provide sufficient land to meet housing needs.

As part of demonstrating the qualities and benefits of this option for Mapua, we have answered the relevant FDS survey questions below:

3. *Please indicate whether you support or do not support **Outcome 3**:*

New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice.

Submission:

Mapua is a very popular place to live given that it is conveniently located between Motueka and Richmond, and with a lot to offer in terms of amenities and lifestyle. The qualities of this environment, coupled with its location, as such that the FDS 2022 should provide for its growth to meet the growing needs and demands.

4. *Please indicate whether you support or do not support **Outcome 4**:*

A range of housing choices are provided that meet different needs of the community, including papaka-inga and affordable options. Please explain your choice.

Submission:

Not all of the preferred options selected to provide for growth in the draft FDS 2022 are able to deliver a range of housing choices.

The land at 49 Stafford Drive provides this opportunity, demonstrated in the Concept Masterplans attached to this submission. This masterplan shows three different housing typologies of:

- 500-650m²
- 350-400m²; and
- 180-250m²

This layout has been preferred using best practice urban and landscape design principles. Importantly, as outlined below I respond to other key outcomes of the draft FDS 2022, this also achieves a number of the other high-level objectives.

5. Please indicate whether you support or do not support **Outcome 5**:

Sufficient residential and business land capacity is provided to meet demand. Please explain your choice.

Submission:

It is submitted that it is not adequate to only aim to provide “sufficient” residential (and business land). What we have learnt over the last 5 years is that the region has fallen well behind on meeting needs for housing, which has had a significant detrimental impact on the cost of housing. Outcome 5, as drafted, will not therefore adequately address the matter of affordability. The only way to address housing affordability to ensure there is ample supply.

The property at Drive should therefore be included in the FDS 2022. This site provides a valuable contribution to meeting needs while also, importantly, achieving a number of the other Outcomes.

6. Please indicate whether you support or do not support **Outcome 6**:

New infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth. Please explain your choice.

Submission:

Mapua has recently upgraded its water and wastewater reticulation and capacity and those systems should now benefit those with the catchment able to be serviced (and rated) for that upgraded infrastructure. Any use of this water supply outside of the supply catchment would be an inefficient use of this water resource.

Confirming 49 Stafford Drive as a part of the FDS 2022 will positively achieve Outcome 6.

7. Please indicate whether you support or do not support **Outcome 7**:

Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice.

Submission:

A central feature of the concept masterplan for Drive is the provision for stormwater retention and wetland enhancement, with significant beneficial impacts on the natural environment. Combined with walkway/cycleway linkages, these areas will become blue/green assets with long term benefits to the community.

8. Please indicate whether you support or do not support **Outcome 8**:

Nelson Tasman is resilient to and can adapt to the likely future effects of climate change. Please explain your choice.

9. Please indicate whether you support or do not support **Outcome 9**:

Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice.

Submission:

Planning for natural hazards and climate change go hand in hand.

The subject site not only provides for intensification of elevated land zoned for residential growth, but also provides for residential growth on the valley floor that would be developed above the flooding risks.

10. *Please indicate whether you support or do not support **Outcome 10**:*

Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice.

Submission:

The land at 49 Stafford Drive is not highly productive land and so this residential growth option achieves Outcome 10.

11. *Please indicate whether you support or do not support **Outcome 11**:*

All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice.

Submission:

The concept masterplan has been designed with an intention to generate positive outcomes to freshwater and terrestrial environments. These intentions have been shared with iwi who have signalled their broad support for this proposal.

13. *Do you support the proposal for **consolidated growth** along State Highway 6 between Atawhai and Wakefield but also **including Mapua and Motueka** and meeting needs of Tasman rural towns? This is a mix of intensification, **greenfield** expansion and rural residential housing. Please explain why?*

Submission:

While this is a greenfield development, a large part of this site is already zoned for residential development (the hill block) with the balance immediately adjoining this existing zoning. The subject site at 49 Stafford Drive therefore is not remote from the Mapua village and would in many ways consolidate growth as per Outcome 13.

14. ***Where would you like to see growth** happening over the next 30 years? Tick as many as you like.*

- *Largely along the SH6 corridor as proposed*
- *Intensification within existing town centres*
- *Expansion into greenfield areas close to the existing urban areas*
- *Creating new towns away from existing centres (if so, tell us where):*
- *In coastal Tasman areas, between **Māpua** and Motueka*
- *In Tasman's existing rural towns*
- *Everywhere*
- *Don't know*

Submission:

It is important for a wide range of growth options to be provided for as not everyone has the same needs and preferences. This land at Drive also has the benefit of meeting a range of needs and preferences.

21. *Do you agree with the level of **intensification proposed in Mapua** (intensifying rural residential area to residential density)? Any comments?*

Submission:

The intensification of Mapua is supported for the reasons outlined above. This provides for a more efficient use of land and infrastructure in close proximity to services and amenities

28. *Do you agree with the location and scale of the proposed **greenfield housing areas in Mapua**?*

Please explain why.

Submission:

Oppose in part. The subject land at Drive is not currently included in the draft FDS 2022 and it is submitted it should be. This site achieves many of the other key Outcomes and scores higher than other identified greenfield options.

29. *Do you think we have **got the balance right** in our core proposal between intensification and greenfield development (approximately half intensification, half greenfield for the combined Nelson Tasman region)?*

30. *If you don't think we have got the balance right, let us know what you would propose. Tick all that apply.*

Submission:

Brownfield development is a lot more expensive than greenfield development due to underlying land and capital costs. As a result, the price point for new townhouses or units developed in a brownfield environment, closer to centre, would be more expensive than the same format developed in a greenfield environment. Affordability needs therefore to be balanced appropriately. It is important to account for these different housing costs when balancing greenfield with brownfield intensification. It is submitted that balancing half-half does not sufficiently provide for the needs of the majority of the demand. Realistically, it is considered that greenfield development will meet more than 90% of actual demand.

31. *Do you support the secondary part of the proposal for a potential **new community near Tasman Village and lower Moutere (Braeburn Road)**? Please explain why.*

Submission: No we do not support a village in Tasman, particular if that involves taking valuable reticulated water supply away from Mapua.

Should TDC want to include this option in its residential growth projects, we undertake to ensure the Mapua Community is appropriately consulted over this proposal, and will provide the opportunity for our masterplanner to incorporate/address the feedback received.

Yours faithfully

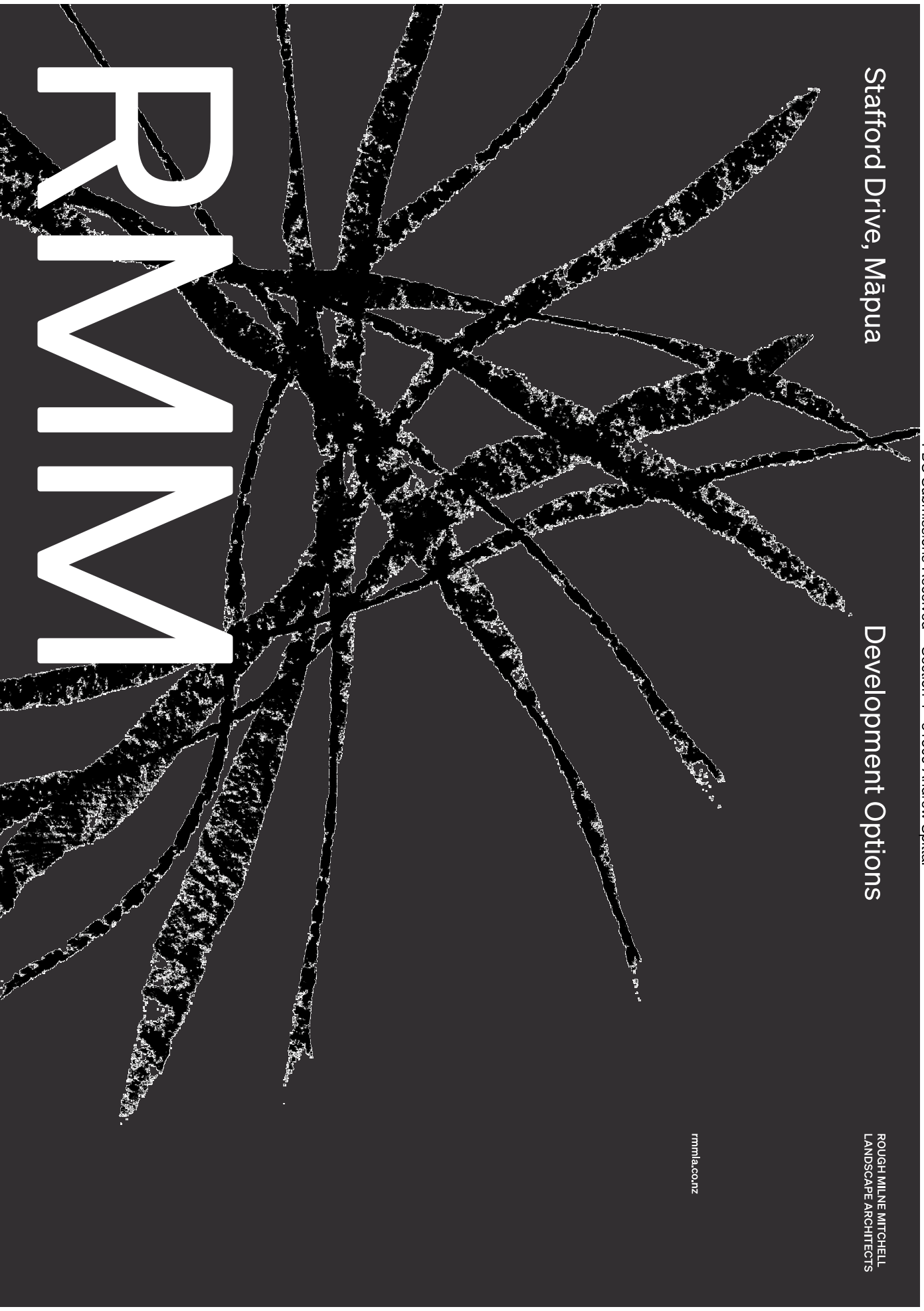
Andrew Spittal

Stafford Drive, Māpua

Development Options

ROUGH MILNE MITCHELL
LANDSCAPE ARCHITECTS

rmmla.co.nz



Design Foundation

Introduction and Purpose

Māpua is a very popular place to live given that it is conveniently located between Motueka and Richmond, and with a lot to offer in terms of amenities and lifestyle. The qualities of this environment, coupled with its location, as such that the Future Development Strategy (FDS) 2022 should provide for its growth to meet the growing needs and demands. Within the context of Māpua, the geographical location of the property at 49 Stafford Drive presents a unique opportunity for this land.

This Concept Masterplan Package has been prepared by Rough Milne Mitchell Landscape Architects to support a submission for the proposed rezoning (and subsequent subdivision and development) of 49 Stafford Drive under the Tasman District Council's FDS 2022. Using best practice urban and landscape design principles this Concept Masterplan Package demonstrates a comprehensive community focused approach that aligns with several key outcomes and high level objectives contained within the draft FDS 2022.

While this is a greenfield development, a large part of this site is already zoned for residential development (the hill block) with the balance immediately adjoining this existing zoning. This property therefore is not remote from the Māpua village and would in many ways consolidate growth and provide for the intensification of the site for residential growth, in part on land already zoned for such. The concept master plan demonstrates how a mix of housing typologies can be realised on the subject site at 49 Stafford Drive, offering a range of living opportunities that in turn provides for well-balanced communities.

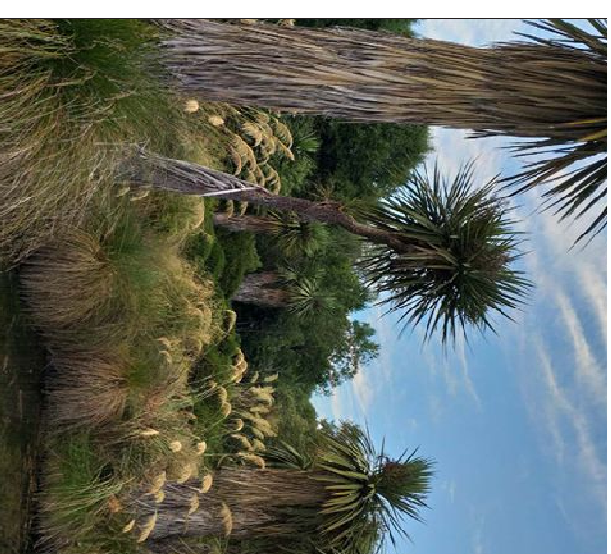
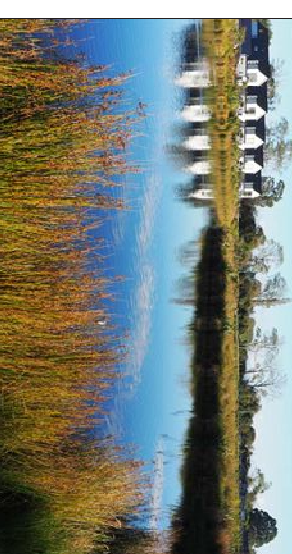
The concept masterplan demonstrates the opportunity for the development of a vibrant community that is an exemplar for a sustainable approach to urban living. A community created within a highly permeable ecological setting and widely connected open space network that celebrates the locality, culture, heritage, and natural environment of Māpua. The site development approach will offer people a unique lifestyle choice which promotes inclusion and diversity, in a location which is directly connected to the wider village setting of Māpua.

RMM

Stafford Drive, Māpua

869

02



Design Foundation

Guiding Principles

Manaakitanga

Manaakitanga is the guiding design principle for the Māpua development project.

The concept of hospitality, and caring for people cannot be achieved without first caring for the te taiao (the natural environment). In effect, manaakitanga as a concept guides our approach as one of the core focuses of the design is to provide for better water quality, and strengthening the mahinga kai opportunities presented by the whenua. The development provides ecological habitat in the area, stormwater design, and site specific native planting selections in an effort to strengthen the mauri (life essence) of the local micro and macro environment. In turn, the development intends to achieve manaakitanga by creating a healthy, welcoming environment for all.

Whanaungatanga

The concept masterplan intends to facilitate the concept of whanaungatanga - the process of building relationships between people, whanau (families) and communities.

Whanaungatanga is fundamental to the success of the Māpua development project and in effect within the design approach we will look to provide spaces for a variety of socialisation and community.

Whakapapa

The significance of the Māpua landscape for ma hinaga kai and the site's proximity to the Waimea inlet can be recognised through the development.

This will be achieved predominantly through highlighting visual connections, walking and cycling connections, and strengthening connections with Māpua. The design intent is to provide opportunities for wānanga and kōrero between residents and visitors in an effort to help site users understand the significance and history of the site and landscape of which it sits.

Design Foundation

Integrated Values

These design principles are expressed as Te ao Māori Kaupapa and stand as a guiding frame work within the overall design of this development. The projects underlying design principles embody values which are fundamental to all design work, and the quality of life and environment in all cultures.

LEADING PRINCIPLES

Manaakitanga

Whanaungatanga

Whakapapa

VALUES

Mauri

Connection

Kōrero

How is this expressed in the design to whakamana Māpua?

Design forms - introduction of nodes/ pause points for gathering, sharing, and resting together.

Natural lines shaped by water.

Material selection- as a reflection of place and existing infrastructure.

Planting selection - to support mauri of the Māpua, and in-effect mahinga kai opportunities as well as being a reflection of place.

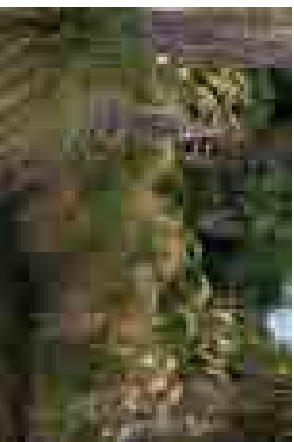
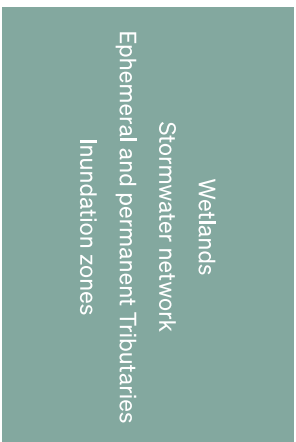
The guiding design principles represent a number of core values which will be present throughout the design of this community.

Kaitiakitanga	Manaakitanga	Whakapapa	Water	Recreation
Matauranga	Whanaungatanga	Ki ura ki tai	Culture	Amenity
Wairuatanga	Hauora	Ecosystems	Resilience	Reflection

Design Foundation

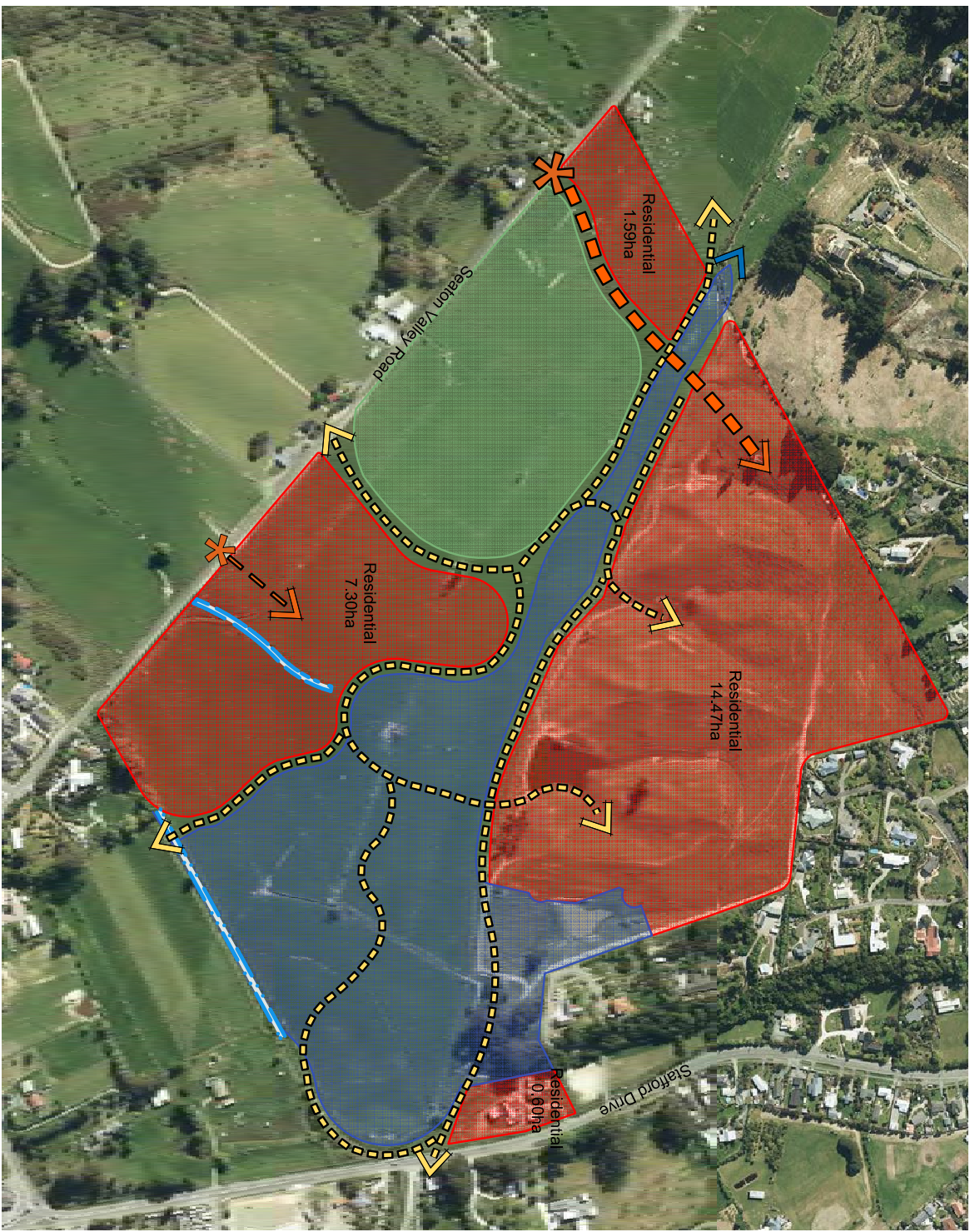
Key Moves

From the guiding narrative introduced previously the following three action pathways have been identified to ensure that future design expresses the identified values overall.



Conceptual Development Area Plan

- LEGEND**
- Residential
 - Stormwater Retention and Wetland
 - Sportfield
 - Rural
 - Pedestrian and Cycleways
 - Primary Entrance and Road
 - Secondary Entrance and Road
 - Open Swale
- AREAS (Approx)**
- Residential: 23,96ha
 - Stormwater Retention and Wetland: 14,35ha
 - Sportfield: 6,70ha
 - Rural: 0,52ha











Site Context
Scale 1:4000@A3

RMM

Stafford Drive, Mapua

Indicative Development Plan

- LEGEND**
-  Residential
 -  Stormwater Retention and Wetland
 -  Sportfield
 -  Rural
 -  Pedestrian and Cycleways
 -  Primary Entrance and Road
 -  Secondary Entrance and Road
 -  Open Swale

AREAS (Approx)
 Residential: 23,96ha
 Stormwater Retention and Wetland: 14,35ha
 Sportfield: 6,70ha
 Rural: 0,52ha



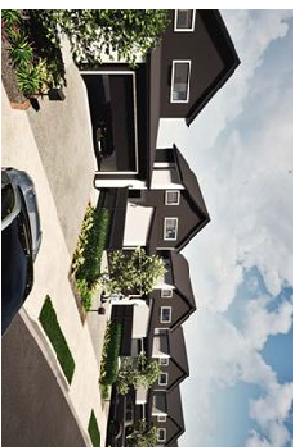
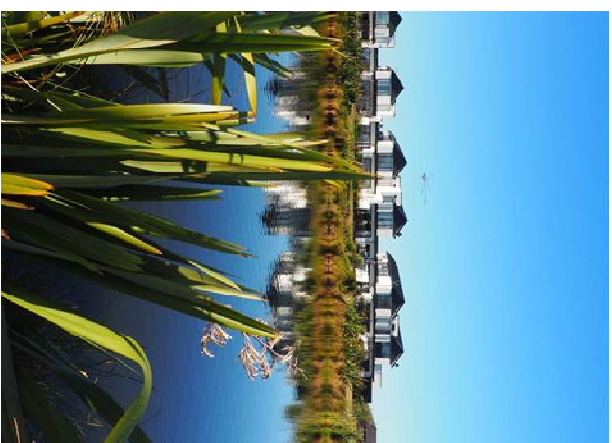
Site Context
 Scale 1:4000@A3

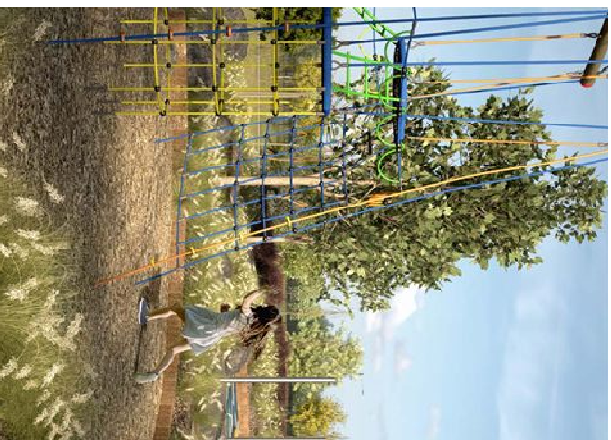
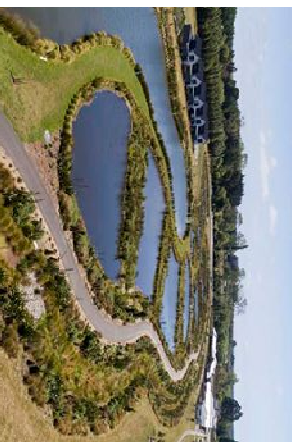
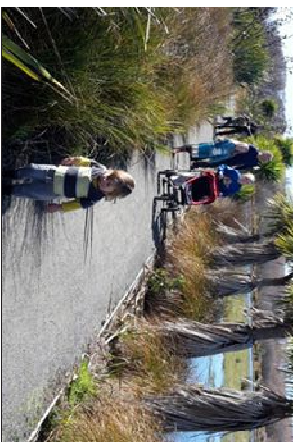
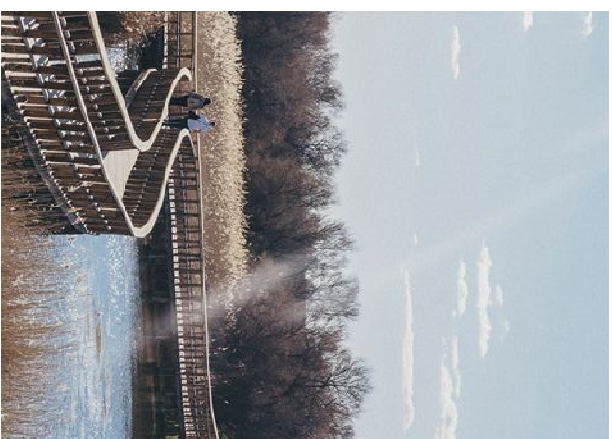
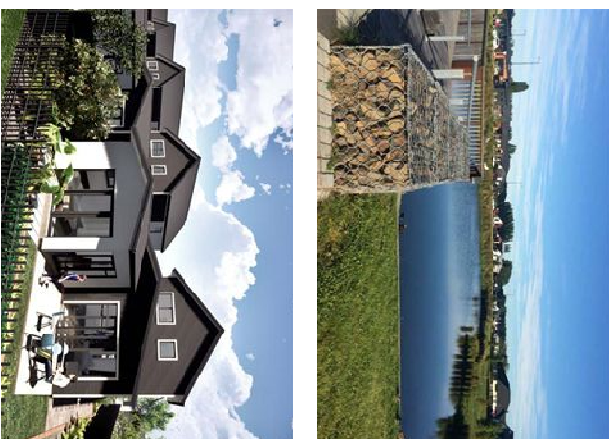
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Stafford Drive, Mapua

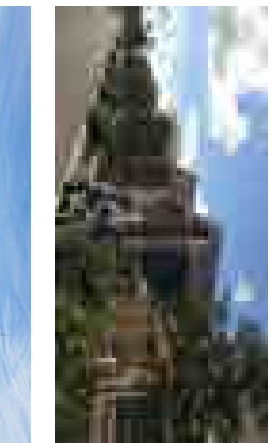
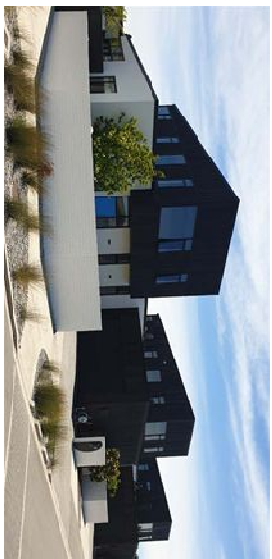
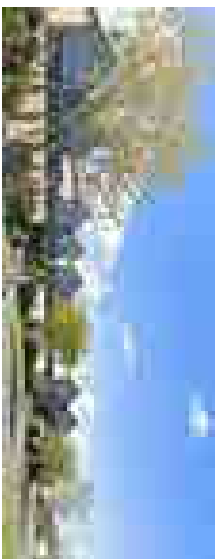
Indicative Concept Masterplan







Housing Types - Precedent imagery



RMM

Stafford Drive, Mapua

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RMM

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Submission Summary

Nelson Tasman Future Development Strategy – Submission #31811

Jackie McNae
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>See attached. The Submitters own two separate groups of properties along Gladstone Road that currently sit within the Residential Zone which the submitter supports being included in a Business Zone.</p> <p>The Draft FDS identifies these two groupings as T117 and T178 and proposes both of these locations as Business Growth options.</p> <p>The submitters support the Draft FDS in respect of identifying T117 and T178 as Business Growth Areas for the reasons set out in the attached Submission.</p> <p>The Submitters support the identification of their landholdings as Business Growth Areas in the FDS and seek that these growth options be maintained in the finalised FDS.</p> <p>The Submitters request that the rezoning of these land areas happens at the earliest opportunity given that the transition from residential activity to business activity has already started. Council is considering a Growth Plan Change for Richmond, and included in that Growth Plan Change is identification of Business Growth Areas. This process is likely to precede the review of the TRMP and the submitters seek that their landholdings in Gladstone Rd be included for rezoning to a Business activity zone as part of the Richmond Growth Plan Changes.</p>

Dayson Nominees & Mahau Properties - Sub # 31811 - 1



**FUTURE DEVELOPMENT STRATEGY
SUBMISSION ON BUSINESS GROWTH AREAS IN RICHMOND**

Submitter:	Dayson Nominees (Richmond) Ltd & Mahau Properties Nominees Ltd.
Location:	52, 54 & 54A Gladstone Rd and 24, 24A, 26 & 28 Gladstone Rd.
Legal Description:	Lot 1 DP17356, RT NL11B/955, Lot 1 DP17690, RT NL11C/862, Lot 2 DP17690, RT NL11C/863. Lot 1 DP13417, RT NL 8B/423, Lot 2 DP13417, RT NL8B/424, Lot 1 DP414739 RT 475522, Lot 2 DP414739, RT 475523 and Lot 3 DP414739, RT 475524.
Submission Summary:	<p>The Submitters own two separate groups of properties along Gladstone Road that currently sit within the Residential Zone which the submitter supports being included in a Business Zone.</p> <p>The Draft FDS identifies these two groupings as T117 and T178 and proposes both of these locations as Business Growth options.</p> <p>The submitters support the Draft FDS in respect of identifying T117 and T178 as Business Growth Areas for the reasons set out in the attached Submission.</p>

Dated this 14th day of April 2022



.....
(Signed by the Submitters authorised agent)

Address for Service:
Staig & Smith Ltd



SUBMISSION ON FUTURE DEVELOPMENT STRATEGY BUSINESS GROWTH AREAS IN RICHMOND

1.0 INTRODUCTION

- 1.1 The Submitters have interests in both Mahau Properties Nominees Ltd and Dayson Nominees (Richmond) Ltd. The two landowning entities own two groups of properties in Gladstone Rd with one group adjacent to the existing Industrial Zone at Poutama St, being 52, 54 and 54A Gladstone Rd. The second group of landholdings comprising five titles of land are located between 24 – 28 Gladstone Rd.
- 1.2 Currently these properties are occupied by residential units, though many of these residential units are nearing the end of their useful life for residential purposes.

2.0 THE SUBMISSION

- 2.1 The Submitters sought inclusion of their landholdings to be identified in the FDS as Business Growth options. The submitters have owned and developed a wide range of landholdings in Nelson and Richmond urban areas and have developed properties for a range of commercial and light industrial tenants.
- 2.2 Mahau Properties Nominees Ltd owns the properties currently occupied by Trinders in Poutama St (2-8 Poutama St) which is zoned Industrial. The residential properties adjoining at 52, 54 and 54A Gladstone Rd are also owned by the submitter. The Submitter's plan for these properties, is to transition the land use to Light Industrial / Business Service activities. Figure 1 below shows the location of 52, 54 and 54A Gladstone Rd together with the Trinder sites at 2-8 Poutama St.



Figure 1: Location of 52, 54 and 54A Gladstone Rd together with 2-8 Poutama St

- 2.3 This process of transition has started with the recent Resource Consent issuing for 54A Gladstone Rd for use of the existing building on this site for office purposes, providing office accommodation for Trinders design staff, as Trinders has insufficient room to accommodate their expanding design staff.

- 2.4 For the Dayson Nominees (Richmond) Ltd landholdings closer to the central area of Richmond, the submitters envisage this area transitioning to Service Commercial activities over time as the existing residential buildings reach the end of their useful life. Figure 2 below shows the location of 24-28 Gladstone Rd properties.



Figure 2: 24-28 Gladstone Rd

- 2.5 The submitters have noted a shortage of business land in the Nelson and Richmond area and are regularly approached for options for relocating businesses or new businesses to the area.
- 2.6 The submitters support the inclusion of these business areas within the FDS and encourage the Council to rezone these areas as soon as possible.
- 2.7 The submitters note that there are two opportunities for rezoning to occur following the highlighting within the FDS of the areas as suitable Business Growth Areas. Those two options are either through a separate Plan Change for Richmond or part of the Tasman Resource Management Plan (TRMP) review. The latter process, the TRMP review is not due to be publicly notified for formal input from the public until the end of 2024. However the Council is considering growth issues in Richmond currently, and it would be appropriate for Council to consider the rezoning of these business areas as part of the Richmond Growth Plan Changes under consideration.

3.0 OUTCOMES SOUGHT

- 3.1 The Submitters support the identification of their landholdings as Business Growth Areas in the FDS and seek that these growth options be maintained in the finalised FDS.
- 3.2 The Submitters request that the rezoning of these land areas happens at the earliest opportunity given that the transition from residential activity to business activity has already started. Council is considering a Growth Plan Change for Richmond, and included in that Growth Plan Change is identification of Business Growth Areas. This process is likely to precede the review of the TRMP and the submitters seek that their landholdings in Gladstone Rd be included for rezoning to a Business activity zone as part of the Richmond Growth Plan Changes.

Submission Summary

Nelson Tasman Future Development Strategy - Submission #31813

Jackie McNae
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>The Submitters have a particular interest for residential growth in Pohara in relation to their property located at Richmond Rd.</p> <p>The Submitters seek to have this property included in the Future Development Strategy. The attached submission sets out the specific issues of concern and details the areas for inclusion in the Future Development Strategy.</p> <p>The Submitters request that their land at Pohara be identified as a growth option, but with the lower area of land being identified as a future growth option only when flood mitigation works have been completed and monitored as to their success. Further in respect of any future growth on the lower level land any future consideration would need to exclude areas within the Cultural Heritage Precinct.</p>

Richmond Pohara Holdings Ltd - Sub # 31813 - 1



**FUTURE DEVELOPMENT STRATEGY
SUBMISSION ON POHARA AS A GROWTH AREA**

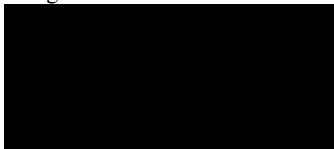
Submitter:	Richmond Pohara Holdings Ltd
Location:	Richmond Road / Abel Tasman Drive, Pohara
Legal Description:	Section 2, SO 543397, RT 961780
Submission Summary:	The Submitters have a particular interest for residential growth in Pohara in relation to their property located at Richmond Rd. The Submitters seek to have this property included in the Future Development Strategy. The attached submission sets out the specific issues of concern and details the areas for inclusion in the Future Development Strategy.

Dated this 14th day of April 2022



.....
(Signed by the Submitter's authorised agent)

Address for Service:
Staig & Smith Ltd



SUBMISSION ON FUTURE DEVELOPMENT STRATEGY RICHMOND POHARA HOLDINGS LTD

1.0 INTRODUCTION

- 1.1 Richmond Pohara Holdings Ltd own land at Pohara with frontage to Richmond Road and Abel Tasman Drive, a portion of which they are currently subdividing for Residential purposes.
- 1.2 The Submitters seek that their landholding be included in the Future Development Strategy for the reasons set out below.

2.0 POHARA GROWTH OPTION

- 2.1 Richmond Pohara Holdings Ltd owns a property at Pohara of 34.1403ha shown in Figure 1 below. A portion of the property was gazetted as a Special Housing Area (SHA). Figure 2 below shows the area identified as an SHA.



Figure 1: Submitters Property at Pohara

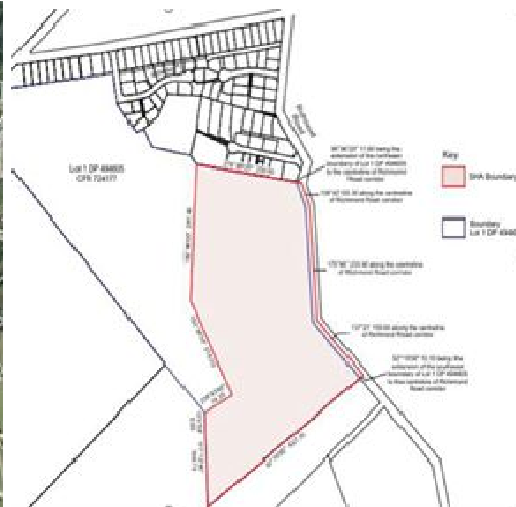


Figure 2: Gazetted SHA extent shown with red line

- 2.2 Following the identification of the Submitter’s land as an SHA, the Submitters proceeded with a Resource Consent Application under the HASHA Act, for a 77 allotment subdivision, 73 were for residential purposes, the other allotments provided for an existing dwelling, a local purpose reserve and roading allotments. Resource Consent was issued to the subdivision. The Submitters have progressed the detailed engineering design for the subdivision and are working through a range of pre-construction issues prior to the first stages of development proceeding in the next few months.

- 2.3 Following the issue of Resource Consent, the Council pursued Plan Change 74 to the Tasman Resource Management Plan (TRMP) to rezone some of the SHA sites. Plan Change 74 rezoned that area of the Submitter’s land for which Resource Consent was obtained for residential allotments. Figure 3 below shows the extent of the residential rezoning and it is within this area, that the Applicants are progressing their subdivision.



Figure 3: Shows Area Rezoned Residential under PC74

- 2.4 The Submitters supported Plan Change 74 in part in terms of the area of land rezoned, but opposed the fact that Plan Change 74 did not take the opportunity to consider the Submitters entire site and the future development potential of the site. Submissions were lodged to that effect, but as the Plan Change was specific to SHA areas, where Resource Consent had issued, it was confirmed that any expansion of the zoning beyond the consented area for subdivision, was outside the scope of Plan Change 74. The Submitters sought therefore that the balance area of land be considered as part of the review of the TRMP.
- 2.5 When Council started the FDS process, the Submitters requested that the balance area of their landholding, be included as a Residential Growth Expansion Area within the FDS.
- 2.6 The Draft FDS considered this option which was identified as T162. T162 was excluded from the Draft FDS for the following reasons:
- “Iwi raised strong concerns over cultural heritage significance in this location. The site is subject to flood risk and stormwater discharge challenges and a wetland exists in the lower part of the site. The site performed poorly under the MCA with better comparable sites closer to existing urban centres”.*
- 2.7 The Submitters are aware that the existing residential development along Abel Tasman Drive and the Camping Ground area at Pohara, sit within a Cultural Heritage Precinct and that there are a number of cultural heritage sites identified in this location. The Cultural Heritage Precinct as mapped under the TRMP does extend onto a small portion of the Submitter’s land immediately behind the row of residential dwellings along Abel Tasman Drive. Figure 4 below shows the extent of the Cultural Heritage Precinct.



Figure 4 : Cultural Heritage Map for Pohara . The red hatched area is a Cultural Heritage Precinct.

- 2.8 In relation to the issues raised regarding flood risk, this issue has been the subject of extensive flooding assessments by the Council and the Submitters with extensive modelling undertaken. This has resulted in the Council pursuing a project of mitigation in relation to a bund adjacent to Bartletts Stream extending over the lower portion of the Submitters land and other landholdings to the west of Abel Tasman Drive behind the dwellings in Selwyn Street. Council has recently gained Resource Consent for this project which involves the building of a bund along Bartletts Stream to the outlet to the sea, to address flooding issues.
- 2.9 The reasons for exclusion are of relevance to part of the Submitters land, particularly that area between Bartletts Stream and the housing adjoining the Submitter’s land adjacent to Abel Tasman Drive. However, the upper portion of the land is not subject to flooding as it is elevated land and sits outside of the extent of the Cultural Heritage Precinct within the TRMP shown in Figure 4 above.
- 2.10 The Submitters support all the other expansion areas that the Council has identified including those around Takaka. However, it is not a matter of only picking some areas for growth and excluding others. All the urban settlement areas need to be considered. There needs to be provision for growth and intensification across the board providing for choices for living environments choices in location and choices in housing typology.
- 2.11 In Golden Bay, many people will choose to live in Takaka, this may be related to their employment, family ties, family considerations in terms of access to schools or ownership of businesses in that locality. However there are other settlements in Golden Bay that people choose to live in as well, many will have a preference for a coastal location. This maybe for a range of reasons, life stage where access to schooling may no longer be priority for a family, employment or recreation and leisure activities may

mean that the preference is a coastal location, such as Pohara with access to Port Tarakohe.

- 2.12 The FDS exclusion of this site seems to be at odds with Councils work in relation to growth areas within Eastern Golden Bay. Council pursued during 2007 / 2008 an Urban Growth Study of locations for expansion in Eastern Golden Bay. This Planning Policy work was not just for a study, it did result in Variation 57 which became Plan Change 8 to the TRMP confirming the Policy framework for future development at this location.
- 2.13 The Map publicly notified as part of Variation 57/PC8 to the TRMP is shown below as Figure 5. The green areas identified in Figure 5 were the future development areas, the yellow areas were identified as possible future development areas. The Submitters land is within the future development area identified in Pohara. Variation 57 did not rezone the landholdings identified, instead Variation 57 to the TRMP, introduced a Policy framework for future development in the identified areas. Variation 57 became P.C 8 under the TRMP, when the TRMP was declared operative.



Figure 5: Plan included in Variation 57 identifying Future Development Areas

- 2.14 Chapter 6.11 covering Takaka – Eastern Golden Bay under the TRMP contains those Policies that were introduced through Variation 57/PC8. For ease of reference these are attached in Appendix 1.
- 2.15 The Policies under 6.11 seek to ensure the Community has a variety of different residential settlement locations to choose from, that there are residential settlement opportunities provided for in coastal and inland locations. This provides a very clear direction that growth options are to be provided both in inland areas such as Takaka and coastal locations such as Pohara. The Draft FDS is contrary to the TRMP. The

Policies specifically address growth and development in Pohara under 6.11.3.2(d), 6.11.3.3, 6.11.3.4, 6.11.3.5 and 6.11.3.6.

- 2.16 In addition, the Policies under 6.3 dealing with Urban Infrastructure, contain a number of policies arising from Variation 57/PC8. Policy 6.3.3.9, 6.3.3.10 and 6.3.3.11 are specific to the Takaka – Eastern Golden Bay area. These policies are also appended and identify the range of issues to be addressed prior to rezoning of such areas which relate to issues of infrastructure. These policies note the approach to development will be a Structured Plan approach.
- 2.17 At a similar time to the Council considering the growth opportunities for Eastern Golden Bay, including Pohara, the Submitters undertook their own Structure Planning exercise to feed into those processes and ensure that their vision for the subject land was shared through the public planning process. Attached in Appendix 2 to this Submission, is the broad Structure Plan developed initially in 2007 and then later amended identifying the lower areas of the property to be further reviewed, once the identified projects to mitigate flooding had been considered, constructed and monitored.
- 2.18 The future growth planning undertaken both by Tasman Council and the Submitters, has influenced the form of development to date and the planning for infrastructure. Since Council's consideration of growth of Takaka and Eastern Golden Bay, there has been a number of significant upgrades and decisions made in respect of infrastructure. Council has significantly upgraded wastewater infrastructure for Takaka and the Eastern Golden Bay settlements, through the addition of pump stations, the upgrade of the pipe network from Tata, through Pohara to the Takaka Sewer ponds where there was a significant upgrade of those ponds. Some millions of dollars have been spent on the upgrade of wastewater infrastructure to support growth including in Pohara. This has been built in to the Development Contributions framework so that as developments proceed, they pay their fair share of investment that has been invested infrastructure.
- 2.19 As has been noted, there has been significant assessment, both by the Council and the Submitters in terms of flooding and stormwater issues in this part of Pohara. This has led to commitment of funding for mitigation works in relation to Bartlett Stream which are now planned for construction. In relation to the Submitters infrastructure planning, there has been significant investigation and investment into stormwater management and design for an additional stormwater detention basin on their land, ensuring that there is no increase in stormwater flows down the catchment post subdivision.
- 2.20 In respect of water, Council has made the decision for this part of Eastern Golden Bay, that they are no longer pursuing an expansion of the water system into this area. Some years ago the Council required developments to install dry water pipes in anticipation of future water provision. However Council has moved away from that position and is not pursuing an upgrade and expansion of the water supply, water will be provided by onsite rainwater collection.
- 2.21 Given all the future planning for expansion in this part of Eastern Golden Bay it is a complete surprise to the Submitter to review the Draft FDS and find the exclusion of the entire area of the Submitters property, outside of the zoned Residential area, despite all the previous planning policy work that has been undertaken, including the Policies that are in the TRMP.

- 2.22 Enquiries to the Council’s Urban Growth Co-ordinator as to why this area has not been pursued under the draft FDS, resulted in comment that Councils Growth Assessment investigations that may have happened in 2007, were some considerable time ago and in 2022, different growth priorities have been identified. However that indicates that the FDS project team considers that the planning and infrastructure assessment only related to a study document. This is not the case, as Variation 57/PC8 proceeded and changed the Policy framework in the TRMP following the study as did investment in infrastructure.
- 2.23 The Submitters have maintained their broad vision for the remaining area of their landholding. In response to the issues over flooding, the Submitters have amended their broad structure plan noting that definitive decisions on the future of the flat land should not be undertaken until such time as mitigation works have been completed and there has been a period of time available for monitoring of those works. However those reasons are not reasons to exclude all of the Submitter’s land from the FDS. The elevated area of land on the opposite side of the gully to the current development, and above Bartlett Creek, are outside any flood risk. This land is not high quality productive land. The land in this elevated portion, was originally owned by Golden Bay Cement and was used as a quarry, as such the land has been extensively disturbed. When Golden Bay Cement finished quarrying on the land, the land was sold into private ownership, where it has been used for extensive grazing.
- 2.24 The Submitters acknowledge the Cultural Heritage significance of the lower area of land adjoining the existing developed housing area, that sits within the Cultural Heritage Precinct. This area of land coincides with the area that the Submitters themselves have identified should not be developed until such time as flood mitigation works have been installed and monitored. The reference to a ‘*potential*’ wetland area in the reasons for exclusion, is also located in the lower area of land between Bartlett Creek and the existing residential activity adjacent to Abel Tasman Drive.
- 2.25 Given the above outline of the extensive planning that has been undertaken both by the Council and the Submitters over a period of some 15 years, it is of concern to see that the FDS is not reflecting this area as a growth area. The infrastructure is available for this area to be developed. The elevated land of the Submitters can be developed in isolation to the lower flat area between Bartlett Creek and Abel Tasman Drive. The intention has always been to connect the upper portions of the Submitters land through the gully, as indicatively shown on the attached Structure Plan in Appendix 2.

3.0 OUTCOMES SOUGHT

- 3.1 The following is the outcome sought by the Submitter.
- (i) The Submitters request that their land at Pohara be identified as a growth option, but with the lower area of land being identified as a future growth option only when flood mitigation works have been completed and monitored as to their success. Further in respect of any future growth on the lower level land any future consideration would need to exclude areas within the Cultural Heritage Precinct.

4.0 HEARINGS

- 4.1 The Submitters seek to be heard in respect of their Submission and would be available for a Hearing at the identified dates of the 27th of April, the morning only of the 28th of April or 3rd of May.
- 4.2 The Submitters seek a one hour time slot for their submissions.

APPENDIX 1

Policies from the Tasman Resource Management Plan relevant to Eastern Golden Bay

6.11 TAKAKA-EASTERN GOLDEN BAY

Refer to Policy set 10.1.

6.11.1 Issues

CB 1407
Op 16/19

The Takaka-Eastern Golden Bay Area is defined as the Takaka Valley lowland area from Tuta Beach in the east to Rangihauata in the west, and south to Upper Takaka at the base of the Takaka Hill. It includes the settlement areas of Ligar Bay, Pohara, Motupipi and Takaka.

Key issues for residential settlement planning in the Takaka-Eastern Golden Bay Area are:

- | | | |
|----------|---|---------------------|
| 6.11.1.1 | How to ensure that land of high productive value is retained for current or future use in rural production. | CB 1407
Op 16/19 |
| 6.11.1.2 | How to manage expanding settlement and urban development along roads (including State Highway 60) and/or the coastline. | CB 1407
Op 16/19 |
| 6.11.1.3 | How to avoid risks associated with development in areas that are flood prone or low lying. | CB 1407
Op 16/19 |
| 6.11.1.4 | How to make sure that coastal values, including natural, landscape and heritage values, are not adversely affected by settlement. | CB 1407
Op 16/19 |
| 6.11.1.5 | How to protect rural open space, green space areas and rural landscapes from expanding settlement. | CB 1407
Op 16/19 |

The key issues specifically for Pohara and environs, which has experienced rapid growth in recent years, are:

- | | |
|-----------|--|
| 6.11.1.6 | The need for a coherent pattern of development that includes additional land for residential and rural residential purposes and that is adequately separated from the effects of industrial development. |
| 6.11.1.7 | Provision for commercial activities within the development pattern. |
| 6.11.1.8 | Recognition of high quality landscape setting and the protection of special features. |
| 6.11.1.9 | Rationalisation of industrial activities at Tanakohi and enhanced amenity. |
| 6.11.1.10 | The need to improve services, including formation of a comprehensive roading pattern between Pohara and Ligar Bay. |

6.11.3 Policies

- | | | |
|----------|--|---------------------|
| 6.11.3.1 | In the Takaka-Eastern Golden Bay Area, to ensure: | CB 1407
Op 16/19 |
| | (a) the community has a variety of different residential settlement locations to choose from; | |
| | (b) residential settlement opportunities are provided for in coastal and inland locations; | |
| | (c) choices in development density and character in appropriate locations have been provided for, including low density residential development and more compact forms of residential development; | |
| | (d) local communities and landowners are involved in structure planning for locations identified in Policy 6.11.3.2, prior to the zoning of that land for residential or rural-residential purposes. | |

6.11.3.2	In the Takaka-Eastern Golden Bay Area, to:	CB 1407 Op 1410
	<ul style="list-style-type: none"> (a) provide for denser residential development at Rangihauata, subject to appropriate wastewater management, management of airfield cross-boundary effects, and an assessment of coastal landscape and natural heritage values, and protection of them from inappropriate subdivision and residential development, and the effects on State Highway 60; (b) provide for a residential settlement area centered at the existing Park Avenue location, subject to: particular consideration of appropriate residential development standards; safe car, pedestrian and cycleway access to Takaka; low impact design solutions; infrastructure services provision (including that of State Highway 60); community amenities; and possible future commercial development opportunity; (c) provide for some more development opportunity in the Pohara area, subject to an assessment of natural heritage, character and amenity values; infrastructure servicing requirements (including that of State Highway 60); access and roads; commercial development, parks and reserves; and the identification and appropriate protection of coastal landscape values; (d) provide for more development opportunity in Ligar Bay and Tata Beach areas (including the coastal catchments), subject to an assessment of natural heritage, character and amenity values; infrastructure servicing requirements (including that of State Highway 60); access and roads; commercial development; parks and reserves; and the identification and appropriate protection of coastal landscape values; (e) consider low impact building design, low-density rural-residential development at the Motepipi Hill location, subject to the assessment, identification, long-term protection and restoration of coastal values, especially sensitive estuarine margins; public access opportunities; the assessment, identification and protection of significant landforms; and appropriate infrastructure services (including that of State Highway 60), including suitable access; (f) provide for mixed use development opportunities at Tarakobe, subject to: particular consideration of the proximity of Port Tarakobe; potential for adverse cross-boundary effects; the protection and enhancement of landscape values; and appropriate infrastructure servicing; (g) consider low-density residential development of the eastern flank of the Rototai Hill – Hanbrook road landform, subject to particular consideration of: landscape values; ridgeline protection; and the management of karst terrain. 	
6.11.3.3	To allow for a range of urban land uses at Pohara and Ligar Bay, including additional land for residential and rural residential purposes.	
6.11.3.4	To allow for commercial activities at Pohara.	
6.11.3.5	To promote a coherent pattern of development by encouraging extension of the existing roading network between Pohara and Ligar Bay in the general alignment identified on the planning maps.	
6.11.3.6	To promote the protection of significant landscape features including indigenous vegetation remnants and rock outcrops at Pohara, Tarakobe and Ligar Bay/Tata from inappropriate subdivision, use and development.	
6.11.3.7	To reduce the extent of industrial zoning at Tarakobe but to retain land to service the port at Tarakobe.	
6.11.3.8	To enhance the amenity and safety of the remaining Tarakobe industrial area through a programme of works including amenity planting, removal of waste material and equipment, and demolition and removal of redundant structures.	

6.11.20 Methods of Implementation

6.11.20.1 Regulatory

- (a) Rules limiting subdivision at Tata Headland and preventing subdivision at Tata Heights.
- (b) Rules controlling the removal of indigenous forest.
- (c) Rules to require developers to construct roading infrastructure in general accord with the indicative roading pattern on the planning maps.
- (d) Rules requiring landscaping of industrial subdivisions.

6.11.20.2 Advocacy

- (a) Advocating for the protection of natural features through covenants or reservation.

6.11.20.3 Works and Services

- (a) Identify an indicative roading corridor between Pohara, Pohara Valley and Ligar Bay.

6.11.30 Principal Reasons and Explanation

In the Takaka-Eastern Golden Bay Area, requiring that settlement take place in defined locations can prevent dispersed and inappropriate development. This can help in avoiding adverse effects on rural values, coastal values and productive land resources, as well as establishing settlements that are more cost-effective to service and less dependent on private vehicles for transport.

CR 1897
Op 06/09

A range of locations and different densities of development can ensure that the lifestyle demands of different people can be met, and can help to ensure that more affordable locations are provided for.

Settlement patterns are guided by the objectives and policies of this section.

Promotion of urban development in a defined area at Pohara/Tarakohē/Ligar Bay is an alternative to development elsewhere where adverse effects on the natural character of the coastal environment are regarded as inappropriate and unacceptable. Pohara/Ligar Bay has been and will continue to be a growth centre in Golden Bay. It is an attractive area for future development as it has good recreational facilities and is close to extensive, safe and sandy beaches and a deep water port. It is proposed that future development should consolidate around the existing settlement and provide for some commercial or tourist activities, with compatible industrial activities at Tarakohē. Some essential services such as water supply and roading need upgrading.

Coherent growth of the Pohara/Tarakohē/Ligar Bay area depends on improvements to the local roading network, to provide an alternative link between Pohara and Ligar Bay. An investigation has identified appropriate corridors that will lead to an integrated roading pattern with minimal adverse effects on the environment.

Since the closure of the Golden Bay Cement Works in 1988, site-clearing works have proceeded slowly. The extent of industrial zoning on the attractive limestone formations between Ligar Bay and Tarakohē, and Pohara and Tarakohē, has been reduced in recognition of their high landscape and ecological values and inappropriateness for industrial development. However, Port Tarakohē is expected to have a significant role as the principal port in Golden Bay, servicing marine farming and tourist industries. Some industrial land is being retained at Tarakohē to provide for new port-related industries and other light industries. Where feasible and safe, worked over areas of the former quarry will be developed for utilisation by new industry.

At Tata Heights and on the Tata tombolo, subdivision is limited to prevent adverse effects on indigenous vegetation remnants and geological features in the coastal environment.

Objective	Chapter 6 – Urban Environment Effects	15 June 2019
(b)	site limitations which may create increased risk of adverse effects either by individual systems or cumulatively.	
6.3.3.9	In the Takaka-Eastern Golden Bay Area, to ensure that:	CR 391 Op 18/18
(a)	settlement objectives, policies and residential location options inform and guide Long Term Council Community Plan servicing decisions;	
(b)	wastewater, water supply, stormwater management, transportation networks (including State Highway 60), and parks and reserves issues and options are addressed before land is zoned for residential settlement;	
(c)	minimum standards for human health and safety, long-term cost effectiveness and environmental quality are met or bettered for any alternative wastewater management and water supply options, such as de-centralised and independent solutions;	
(d)	where on-site wastewater treatment and disposal solutions are used, the standard of management avoids, remedies or mitigates adverse effects on water quality, and that long-term management and maintenance responsibilities are clearly defined;	
(e)	structure planning with the local community and landowners is undertaken where appropriate and necessary to achieve comprehensive infrastructure planning;	
(f)	private infrastructure service provision is considered where the legal, financial and practical responsibilities for design, construction, maintenance and repair are clearly defined.	
6.3.3.10	In the Takaka-Eastern Golden Bay Area, to ensure that:	CR 397 Op 18/18
(a)	new residential development consolidates around existing residential development in locations that have been zoned for that purpose;	
(b)	settlement areas are well connected with safe and efficient roads, safe and pleasant walkways, cycle lanes and bridle-paths;	
(c)	appropriate residential settlement opportunity is provided for in a location that is within walking and biking distance to the existing Takaka township;	
(d)	appropriate residential settlement opportunities are provided for in locations that are in proximity to effective and efficient wastewater treatment and disposal facilities;	
(e)	opportunities for light industrial and commercial activity are provided for in appropriate locations that are within proximity to existing settlement areas and transport networks.	
6.3.3.11	In the Takaka-Eastern Golden Bay Area, to ensure that:	CR 397 Op 18/18
(a)	local communities are involved in determining appropriate development standards for built development and infrastructure planning prior to the rezoning of land for residential development;	
(b)	the character of development and built infrastructure is in keeping with the natural heritage, landscape character and amenity values of the surrounding environment, without compromising human health and safety;	
(c)	landowners and developers are actively encouraged to use the New Zealand Standards Handbook of Subdivision for People and the Environment (SNE HB44:2001), in the design of future subdivision and development, where these standards are consistent with the Long Term Council Community Plan objectives for settlement planning and development.	

APPENDIX 2

Richmond Pohara Holdings
Ltd

Structure Plans

Legend/Design Notes

- Standard Dwelling Residential (open or grassed)
- High Density Residential (30% or less)
- Commercial
- Reserve
- Wetland
- Riparian/Keppel Swamp
- Dimensional Drain
- Proposed Water Features

Minimum Roadway Standards

- ① Type 1 Road (commercial lots on one side), 12m reserve (including gravelled parking along footpath), 2 x 2.5m kerbs (containing 1m kerb footpath and/or landscaping), 7m carriageway, parking on both sides required. Note: parking can be provided in parallel, angle, staggered or cut side or in cul-de-sac areas.
- ② Type 2 Road (residential lots on both sides), 15m reserve, 2 x 1.4m kerbs, 6m carriageway, 2 x 2m kerbs, parking both sides in cut areas.
- ③ Type 3 Road (reserve on one side), 15m reserve, 1 x 1.4m kerb, 6m carriageway, 1m kerb reserve side, 2m kerb lot side, parking one side in cut areas.
- ④ Type 4 Road (reserve both sides), 12m reserve, 2.5m carriageway, 2 x 1m kerbs.
- ⑤ Type 5 Lane/Cut de sac, 10.5m reserve, 3.1m carriageway, grassed kerbs/curbs, passing flags in driveway, no kerb and channel.
- ⑥ Type 6 Residential Track, 1.8m kerb formation, all weather surface.

Note: Car parking shall be provided at the rate of 1 park per residential allotment, and for commercial land based on 1 Type 1 road for submission and based on usage for other developments as specified in the PTMAP.



Richmond Pohara Holdings Ltd

Site Development Plan for Discussion 2007

Scale 1:2000
By Senga Smith Ltd

UNAPPROVED
- PLAN LAY OUT -



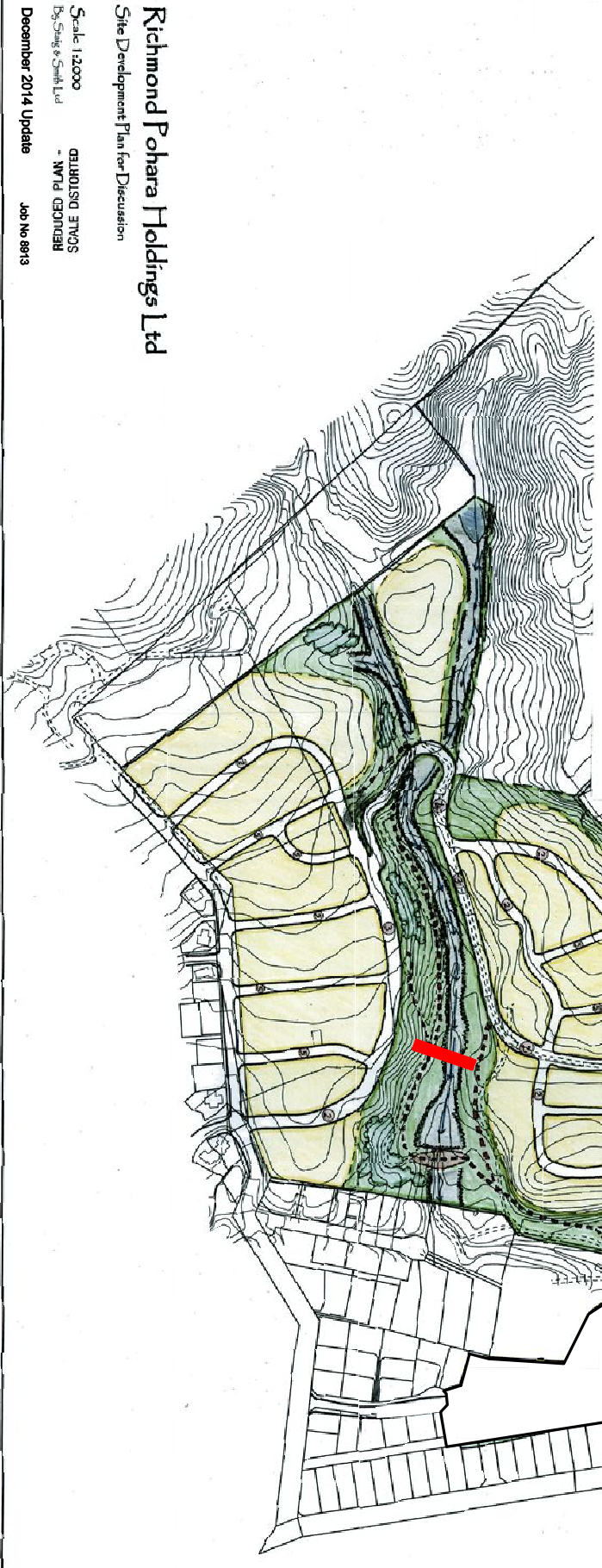
Legend/Design Notes:

- Standard Driveway/Retardwall (above or ground)
- Existing Rural Zone - areas for future consideration following monitoring of flood mitigation measures.
- Reserve
- Warning
- Wetland
- Riparian Stream
- Detention Dam
- Existing
- Detention Dam Proposed
- Proposed Nature Plantings

Minimum Roadway Standards

- ① Type 1 Road (commercial/low on any side): 7m reserve (including parallel parking along footpath), 2 x 3m berms (containing 2m min footpath and/or landscape), 7m carriageway, marking on both sides required (Note: parking can be provided in parallel angle, grouped in set areas or compact areas etc)
- ② Type 2 Road (residential/low on both sides): 1.5m reserve, 2x 1.5m footpaths, 6m carriageway, 2 x 2m kerb parking both sides in cut outs
- ③ Type 3 Road (reserve on one side): 1.5m reserve, 1x 1.5m footpath, 6m carriageway, 1 m berm reserve side, 2m kerb side, parking one side in cut outs
- ④ Type 4 Road (reserve both sides): 1.2m reserve, 3m carriageway, 2x 1m berms
- ⑤ Type 5 Low/Cut/Drain: 1.02m reserve, 3.5m carriageway, gravel kerbs/curbs, grassed footpath, drainage, wetlands and channel.
- ⑥ Type 6 Recreational Track: 1.5m to 2m formation, all weather surface

Note: Car parking shall be provided at the rate of 1 park per residential allotment and for commercial land based on 1 type 1 road for subdivision and based on usage for site development as specified in the TRM.P.



Richmond Pohara Holdings Ltd
Site Development Plan for Discussion

Scale 1:2000
DISTORTED
SCALES
REDUCED
By Stage 6 South Ltd
- NPLD
December 2014 Update Job No 8913

Submission Summary

Nelson Tasman Future Development Strategy - Submission #31814

Jackie McNae
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	24 Do you agree with the location and scale of proposed greenfield housing areas in Richmond? Please explain why.	Neutral	SEE ATTACHED PDF Both organizations seek that their landholdings be identified as business growth options within the Future Development strategy and in due course, both landholdings should be rezoned in their entirety to Rural Industrial.



**FUTURE DEVELOPMENT STRATEGY
SUBMISSIONS ON BUSINESS GROWTH OPTIONS**

Submitter:	Pharmalink Extracts Limited & New Zealand Hops Limited
Location:	379 – 391 Appleby Highway and 5-11 Blackbyre Road
Submission Summary:	The two Submitters own land adjoining the Appleby State Highway and Blackbyre Road utilised for Rural Industrial purposes. The Submitters land is split zoned with only a portion of their landholdings zoned for Rural Industrial purposes with the remaining areas zoned Rural 1. Both landowners hold Resource Consents for a level of future expansion, but wish to see their landholdings identified as Business Growth Areas under the Future Development Strategy and in due course seek their land be fully zoned as Rural Industrial. The attached submission sets out the background and reasons to this submission.

Dated this 14th day of April 2022

.....
(Signed by the Submitter’s authorised agent)

Address for Service:
Staig & Smith Ltd

SUBMISSION ON FUTURE DEVELOPMENT STRATEGY
BUSINESS GROWTH OPTIONS
PHARMALINK EXTRACTS LTD & NZ HOPS LTD

1.0 INTRODUCTION

1.1 Pharmalink Extracts Ltd (Pharmalink) and NZ Hops Ltd (NZH) own land adjacent to Appleby State Highway and Blackbyre Road. Both landowners are involved in industrial resource processing activities, however only portions of their landholdings are zoned for this purpose. Both Companies have expansion plans.

2.0 SUBMISSIONS

Pharmalink Extracts Ltd

2.1 Pharmalink own three titles of land comprising a total area of 2.33ha. Below in Figure 1 is an aerial plan showing the location of existing buildings within the Submitters landholdings.



Figure 1: Pharmalink Landholdings

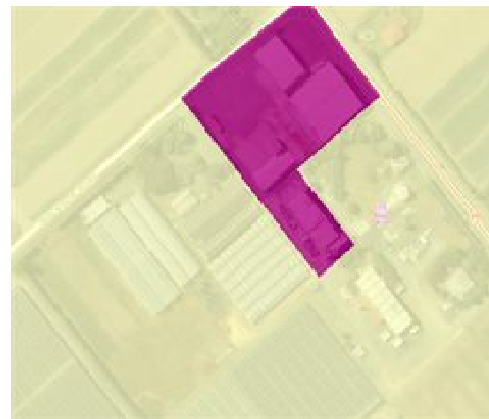


Figure 2: Split Zoning of Pharmalink & NZ Hops Landholdings, the area in Pink being a Rural Industrial Zone and the Yellow area being zoned Rural 1

2.2 Both Submitters are involved in industrial processing of rural and marine products as detailed below. Their landholdings however are split zoned with a small portion of each landholding zoned for Rural Industrial processing with the remainder being within the Rural 1 Zone as shown in Figure 2 above.

- 2.3 Pharmalink processes a range of rural and marine raw products to produce oil extracts and dry powders which are utilised in a range of nutraceutical products produced offsite. Currently Pharmalink has one extraction plant, cool store facilities, offices and workshop facilities together with a range of supporting infrastructure located over their landholdings.
- 2.4 Pharmalink holds a Resource Consent to expand their Extraction facilities through the construction of a further two Extraction Plants and additional cool store facilities.
- 2.5 Each time that Pharmalink wishes to increase capacity onsite, they have to embark on Resource Consent Application processes. This is notwithstanding the acceptance by Council that the Pharmalink site, notwithstanding the split zoning, is land that is no longer available for productive activity and is land that has been accepted as suitable for rural industrial processing activities.
- 2.6 Pharmalink is a significant growth industry in the region integral to the growth of a range of rural productive activities as well as marine based activities. The technology utilised by Pharmalink is leading edge technology, adding significant value to the rural and marine raw products from our region.
- 2.7 Key growth industries in the region need to be supported by the Planning framework, enabling, in this case Pharmalink, to pursue expansion activities quickly rather than having to negotiate Resource Consent Application processes because of inappropriate zoning.

NZ Hops Ltd

- 2.8 NZH holds their land in three titles with a combined land area of 2.72ha. NZH is a long established company with a large hop processing plant and distribution centre on site. They are a grower owned cooperative servicing over 820ha of hops in production within the region.
- 2.9 Figure 3 below identifies the NZH landholdings and the existing buildings on the land. Notwithstanding the processing activities and the existence of the processing and storage buildings, NZH land is also split zoned between Rural Industrial Processing and Rural 1 zoning as shown in Figure 2 above.

3.0 **OUTCOMES SOUGHT**

- 3.1 Both Submitters seek that their landholdings be identified as business growth options within the Future Development strategy and in due course, both landholdings should be rezoned in their entirety to Rural Industrial.
- 3.2 The Submitters are happy to be heard in respect of the subdivision.

Submission Summary

Nelson Tasman Future Development Strategy – Submission #31815

Peter Wilks

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	01 Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in GHG emissions by integrating land use transport. Please explain your choice:	Strongly agree	
TDC - Environment and Planning	02 Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements.	Agree	

	Please explain your choice:		
TDC - Environment and Planning	03 Please indicate whether you support or do not support Outcome 3: New housing is focussed in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice:	Agree	Basically agree but "where people want to live" is not necessarily the overall optimum outcome. Encouragement of Nelson City/Richmond & Motueka as the primary population centres and leave the rural townships as they are (Tapawera/Tasman etc.) Otherwise the whole region will become one great urban sprawl.
TDC - Environment and Planning	10 Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice:	Agree	Mostly should be protected but some boundary rationalization.
TDC - Environment and Planning	11 Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice:	Disagree	Doesn't sound right.
TDC - Environment and Planning	12 Regarding the FDS outcomes, do you have any other comments or think we have missed anything?		No.
TDC - Environment and Planning	13 Do you support the proposal for consolidated	Agree	Yes but a limit must be put on it.

	<p>growth along SH6 between Atawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?</p>		
<p>TDC - Environment and Planning</p>	<p>14 Where would you like to see growth happening over the next 30 years? Please list as many of the following options that you agree with: (a) Largely along the SH6 corridor as proposed (b) Intensification within existing town centres (c) Expansion into greenfield areas close to the existing urban areas (d) Creating new towns away from existing centre (please tell us where) (e) In coastal Tasman areas, between Mapua and Motueka (f) In Tasman's existing rural towns (g) Everywhere (h) Don't know</p>		<p>Largely along SH6 corridor as proposed. Intensification within existing town centres. Creating new towns away from existing centres. Tapawera would be a perfect place for a new town.</p>
<p>TDC - Environment and Planning</p>	<p>21 Do you agree with the level of intensification proposed in Māpua (intensifying rural residential</p>	<p>Disagree</p>	<p>Mapua needs to be kept as a peaceful seaside village. Too many houses will ruin the place. Mapua badly needs a decent supermarket.</p>

	area to residential density)? Any comments?		
TDC - Environment and Planning	22 Do you agree with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.	Strongly agree	
TDC - Environment and Planning	23 Do you agree with the location and scale of proposed greenfield housing areas in Stoke? Please explain why.	Strongly agree	
TDC - Environment and Planning	24 Do you agree with the location and scale of proposed greenfield housing areas in Richmond? Please explain why.	Strongly agree	
TDC - Environment and Planning	25 Do you agree with the location and scale of proposed greenfield housing areas in Brightwater? Please explain why.	Strongly agree	
TDC - Environment and Planning	26 Do you agree with the location and scale of proposed greenfield housing areas in Wakefield? Please explain why.	Strongly agree	
TDC - Environment and Planning	34 Do you agree with the proposed residential and business growth sites in Tākaka?	Neutral	
TDC - Environment and Planning	35 Do you agree with the proposed residential and	Neutral	

	business growth sites in Murchison?		
TDC - Environment and Planning	36 Do you agree with the proposed residential and business growth sites in Collingwood?	Neutral	
TDC - Environment and Planning	37 Do you agree with the proposed residential and business growth sites in Tapawera?	Neutral	
TDC - Environment and Planning	38 Do you agree with the proposed residential and business growth sites in St Arnaud?	Neutral	
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>I believe the Medium-High population forecasts are wildly optimistic and the region will not grow anywhere like what is forecast. Families are getting smaller and the demographic in Nelson/Tasma is an aging population that will want to be living in Richmond/Stoke/Nelson City.</p> <p>There should be a limit to planned growth in this region or it will ruin the existing lifestyle and attractiveness of this region as a place to live.</p>

Peter Wilks - Sub # 31815 - 1



SUBMISSION FORM

DRAFT NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022 – 2052

You can also fill out this survey online. Please see the link at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Name: Peter Wilks

Organisation represented (if applicable): Private

Address: [Redacted]

Email: [Redacted]

Do you wish to speak at a hearing? Yes No If yes, which date? 27 April 28 April 3 May

Hearings are scheduled for 27 April, 28 April and 3 May and are likely to be online rather than in person due to the current Red setting in the Covid Protection Framework and in order to keep everyone safe. If you do not tick one date, we will assume you do not wish to be heard. If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please indicate here: Te Reo Māori New Zealand sign language

Public information: All submissions (including the names and contact details of submitters) are public information and will be available to the public and media in various reports and formats including on the Councils' websites. Personal information will also be used for administration relating to the subject matter of submissions. Submitters have the right to access and correct any personal information included in any reports, information or submissions. The Councils will not accept anonymous submissions or any submissions containing offensive content.

1. Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in greenhouse gas emissions by integrating land use transport. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

[Handwritten notes and lines for response to Outcome 1]

2. Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements. Please explain your choice.

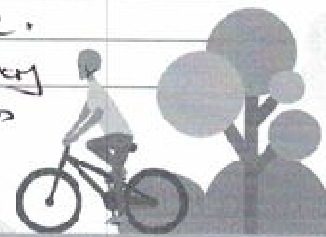
Strongly agree Agree Neutral Disagree Strongly disagree Don't know

[Handwritten notes and lines for response to Outcome 2]

3. Please indicate whether you support or do not support Outcome 3: New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Basically agree but "where people want to live" is not necessarily the overall optimum outcome. Encouragement of Nelson City / Richmond as the primary population centres - leave the rural townships as they are (Tapuae / Tasman etc). Otherwise the whole region will just become one great urban sprawl.



10. Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Mostly should be protected but some boundary rationalisation.

11. Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Doesn't sound right.

12. Regarding the FDS outcomes, do you have any other comments or think we have missed anything?

No.

13. Do you support the proposal for consolidated growth along State Highway 6 between Atawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?

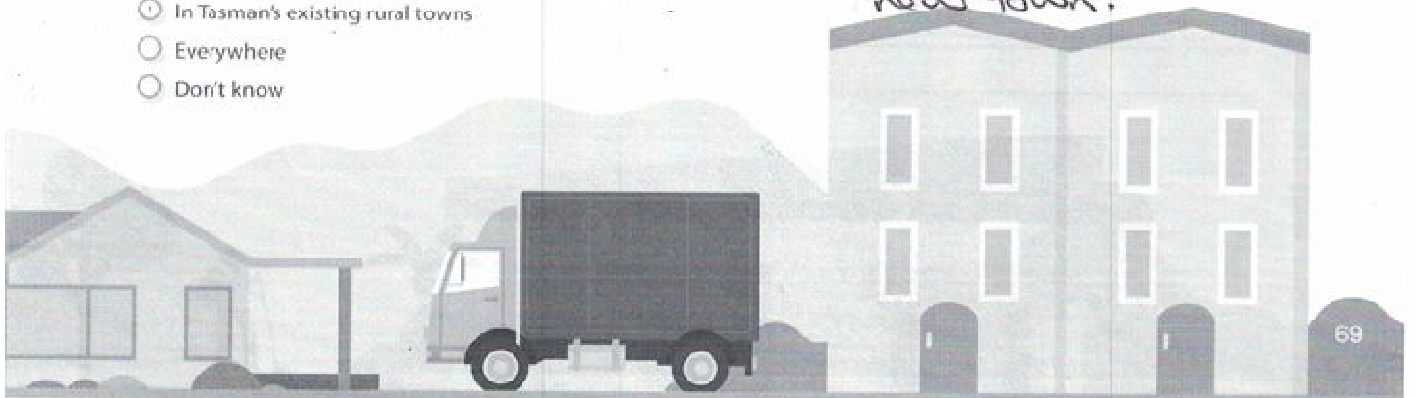
- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Yes but a limit must be put on it.

14. Where would you like to see growth happening over the next 30 years? Tick as many as you like.

- Largely along the SH6 corridor as proposed
 Intensification within existing town centres
 Expansion into greenfield areas close to the existing urban areas
 Creating new towns away from existing centres (if so, tell us where):
 In coastal Tasman areas, between Māpua and Motueka
 In Tasman's existing rural towns
 Everywhere
 Don't know

Tapanera would be a perfect place for a whole new town.



21. Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Māpua needs to be kept as a peaceful seaside village. ~~There~~ Too many more houses will ruin the place. Māpua badly needs a decent Supermarket.

22. Do you agree with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

23. Do you agree with the location and scale of the proposed greenfield housing areas in Stoke? Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

24. Do you agree with the location and scale of the proposed greenfield housing areas in Richmond? Please explain why.

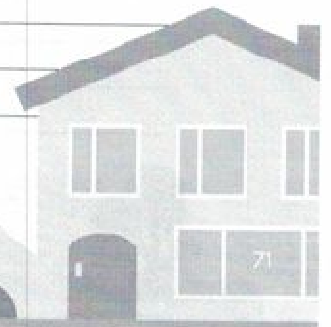
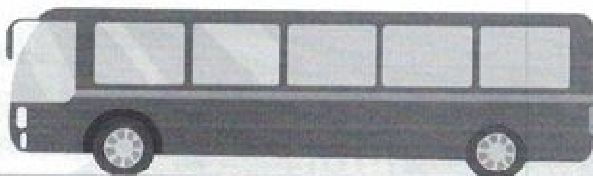
- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

25. Do you agree with the location and scale of the proposed greenfield housing areas in Brightwater? Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

26. Do you agree with the location and scale of the proposed greenfield housing areas in Wakefield? Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know



34. Do you agree with the proposed residential and business growth sites in Takaka?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

35. Do you agree with the proposed residential and business growth sites in Murchison?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

36. Do you agree with the proposed residential and business growth sites in Collingwood?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

37. Do you agree with the proposed residential and business growth sites in Tapawera?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

38. Do you agree with the proposed residential and business growth sites in St Arnaud?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

39. Let us know which sites you think are more appropriate for growth or not in each rural town. Any other comments on the growth needs for these towns?

40. Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?

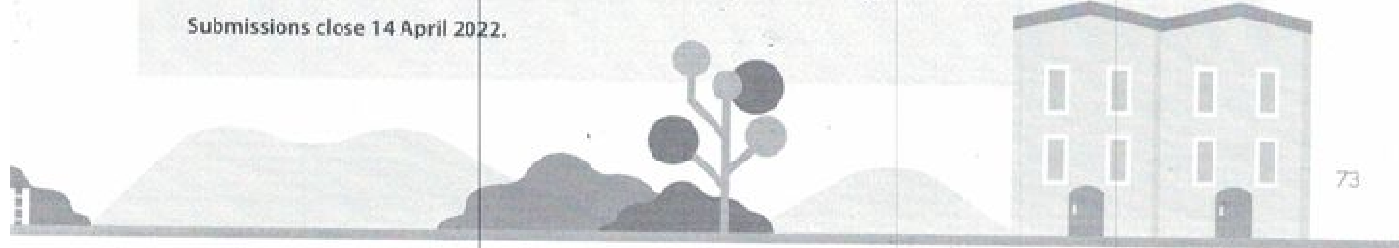
① I believe the Medium - High Population forecasts are wildly optimistic and the region will not grow anywhere like what is pro forecast. Families are getting smaller and the demographic in Nelson/Tasman is an aging population that will want to be living in Richmond/Stratford/Havelock.

② There should be a limit to planned growth in this region or it will ruin the existing lifestyle and attractiveness of this region as a place to live.
It's important to have your say on the big choices.

- Once you've filled out this submission form:
- Email it to futuredevelopmentstrategy@ncc.govt.nz or futuredevelopmentstrategy@tasman.govt.nz.
 - Post it to Tasman District Council, 189 Queen Street, Private Bag 4, Richmond 7050 or Nelson City Council, PO Box 645, Nelson 7040.
 - Drop it off to your nearest customer service centre for either Tasman District or Nelson City Council.

Alternatively, you can fill out the survey online. A link is provided at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Submissions close 14 April 2022.



Submission Summary

Nelson Tasman Future Development Strategy – Submission #31819

Jackie McNae
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	24 Do you agree with the location and scale of proposed greenfield housing areas in Richmond? Please explain why.	Neutral	SEE ATTACHED PDF The outcome the Submitters seek through the FDS process, is confirmation that the subject landholdings are identified for Residential development with the opportunity to undertake a range of densities of development, including Medium to High Density Development. The FDS should also signal that within new Residential areas that provision should be included for neighbourhood commercial and community activities. The Submitters wish the Ahimia land to be identified as a residential growth option enabling a range of densities of development and a range of housing typology. The SHA process has confirmed how the land can be serviced and therefore the future of this land should be as Residential land, not left as Rural Residential with a minimum 2000m ² per allotment. The FDS should encourage a level of Business growth through a mixed use approach, that should apply to the Submitters landholdings. Provision should be incorporated into the future Zoning framework for recreational activities to be provided for as permitted activities, together with service activities for the significant numbers of visitors, cyclists and walkers attracted into Silvan Park to have opportunity for service facilities such as cafes and lodge / accommodation facilities, as well as enclaves of residential development, located within suitable locations while still maintaining the low density, high amenity, backdrop to Richmond.



**FUTURE DEVELOPMENT STRATEGY
SUBMISSION ON RICHMOND / NELSON SOUTH**

Submitter:	Ahimia Ltd, R & S Griffin, M & L Griffin & R Griffin
Location / Legal Description:	<p>Ahimia Ltd –</p> <p>R&S Griffin -</p> <p>M&L Griffin -</p> <p>R Griffin -</p> <p align="right">ha)</p>
Submission Summary:	<p>The Griffin Family own the above land holdings in Richmond with the Angelus Avenue and 218 Champion Rd land holdings being within Tasman District Council and 187 and 205 Champion Rd being within Nelson City Council. 205 Champion Rd is identified in the Future Development Strategy as T100. The other properties owned by the family are not currently identified within the Future Development Strategy (FDS) and the submitters wish to have these areas considered as detailed in the attached submission.</p>

Dated this 14th day of April 2022

.....
(Signed by the Submitter’s authorised agent)

Address for Service:
Staig & Smith Ltd

SUBMISSION ON RICHMOND / NELSON SOUTH
FUTURE GROWTH OPTIONS
GRIFFIN FAMILY

1.0 INTRODUCTION

- 1.1 The Griffin family own Ahimia Ltd land at Angelus Ave, 187 and 205 Champion Road, within Nelson City and 218 Champion Road accessed via Silvan Place.
- 1.2 A significant portion of the landholdings within Nelson City Council area are zoned Residential with a portion in the Rural high density Small Holdings area. These land holdings are yet to be developed. The family has a vision for their land at 187 and 205 Champion Road for residential development supporting opportunities for Medium to High Density Development on those landholdings.
- 1.3 The landholdings located at 218 Champion Road / Silvan Place are currently within the Rural Zone. The land has been developed in part as a mountain bike park and was until recently a forestry block. The exotic forest has been logged and the area replanted as a permanent native forest. The Submitters vision for this area, does not fully align with the current zoning.
- 1.4 The final area of land is the land above Angelus Avenue which is the Ahimia land. This land sits largely within a Rural Residential Zone, but also holds Resource Consent for a Mixed Use Medium to High Density development which arose from the site being identified as a Special Housing Area (SHA) under the provisions of the Housing Accords and Special Housing Areas Act. Resource Consent has been granted for a 52 lot fee simple residential development, where within two of those allotments, consent was given for a further 21 unit title development.
- 1.5 Set out below in the Submission is the background to each of the sites, the vision for the site and the outcomes sought within the Future Development Strategy (FDS).

2.0 SUBMISSION ON 187 AND 205 CHAMPION ROAD, RICHMOND

The Site and Background

- 2.1 187 and 205 Champion Road are two separate titles of land located within Nelson City Council territorial area.
- 2.2 187 Champion Road is a title of 1875m². It is zoned Residential under the current Nelson Resource Management Plan (NRMP). A portion of this property is currently occupied by a building servicing the Riding for the Disabled. This property has frontage to Saxton stream. There is a bridge in place from this property across the stream to 205 Champion Road. This provides the connection for those using the Riding for the Disabled arena which is located currently at 205 Champion Road. The building facilities and parking are located at 187 Champion Road for Riding for the Disabled.

- 2.3 205 Champion Road contains the Griffin family homestead and accessory buildings. The property as noted includes the riding arena for Riding for the Disabled. The property contains a large lake and is extensively landscaped as can be seen from Figure 1 below.



Figure 1: Submitters Landholdings – 187 and 205 Champion Rd

- 2.4 205 Champion Road is split zoned with the larger portion of the land zoned Residential under the NRMP that sits immediately adjacent to Saxton Stream, with the upper portion of the land currently being within the Rural Zone but identified within the High Density Small Holdings Area. The split zoning of this property is shown in Figure 2 below.



Figure 2: Zoning Map

- 2.5 The Submitters hold Resource Consent for 205 Champion Road for a small scale three unit accommodation development located in the upper south eastern corner of the property adjacent to Champion Road. These units are small scale modular units that have consent for one to two bedrooms to be used either as visitor accommodation or rental accommodation. The Submitters have obtained Building Consent for two of those units and they are currently under construction. This small scale project is part of a “Pilot” project looking at different modular construction options which the Submitters may pursue on other parts of the subject property and potentially over areas of the Ahimia land.

Vision for 187 / 205 Champion Road

- 2.6 The Submitters intend to develop these landholdings largely for residential purposes and sought through the Draft Nelson Plan process and through the initial request made to be included within the FDS, that their landholding be largely zoned Residential, with the focus for 205 Champion Road being for what was identified as a Medium Density Residential Zone in the Draft Nelson Plan which was promoted as having an average allotment area of 200m² with up to three storey residential units being a Permitted Activity.
- 2.7 The Submitters consider that 205 Champion Road is ideally located, being a large greenfield site bounded on one side by the road and another by Saxton stream, meaning that a higher density development can be achieved without impacting on established neighbourhoods. The Submitters intention is to continue to work through a Master Plan process that would provide opportunities not just for residential neighbourhoods, including Higher Density / Medium Density Residential Developments, but also provision for opportunities for local scale commercial, community and recreation areas.
- 2.8 The lake area and its surrounds, together with the Saxton Stream area, offer opportunities to develop neighbourhoods that are relatively dense, but nestled within high amenity environments with opportunity for shared community open space and good linkages through walkways and cycleway connections to the Saxton Stream Esplanade area that progresses down to Saxton field and beyond, and the Silvan mountain bike park which is accessed on the opposite side of Champion Road.
- 2.9 The Submitters vision for the property is that it offers opportunities for a range of Medium to High Density Development together with areas of Lower / Standard Density Residential Development encouraging a range of housing typology as well as encouraging a diverse age demographic and household make up.
- 2.10 The Submitters have been working on a broad Master Plan for 205 Champion Rd over the last year and have been consulting with Council staff as part of this process to ensure their vision aligns with Councils planning direction under the Draft Nelson Plan and the FDS.

Outcomes Sought for 187 and 205 Champion Road through the FDS

- 2.11 The outcome the Submitters seek through the FDS process, is confirmation that the subject landholdings are identified for Residential development with opportunity to undertake a range of densities of development, including Medium to High Density

Development. The FDS should also signal that within new Residential areas that provision should be included for neighbourhood commercial and community activities.

3.0 SUBMISSION ON AHIMIA LIMITED LAND

The Site and Background

3.1 The Ahimia Limited land is located with frontage to Angelus Avenue and frontage to Selbourne Avenue as shown in Figure 3 below. The property comprises an area of 7.2631ha. The majority of the subject land is currently zoned Rural Residential Serviced with a minimum subdivision area of 2000m² with a small area zoned Residential.



Figure 3 : Ahimia Landholding of 7.2361 ha

3.2 The subject land holds Resource Consent for a subdivision, land use and associated earthworks and discharges for a development involving 52 allotments for residential units with a further 20 Unit Titles for a range of residential and short term living accommodation. Figure 4 below is the consented Subdivision Plan. The current Consents held provide for a wide range of densities of development from High Density Unit Title Development through to larger Low Density allotments towards the rear of the property along with large communal open space areas.



Figure 4 : Ahimia Consented Subdivision Plan

- 3.3 During 2021 Council Notified and had Hearings in relation to Plan Change 74, which rezoned to Residential some SHAs that held Resource Consents, so that the zoning reflected the Resource Consents held. It was raised with Council as to why they did not rezone the Ahimia land as part of the Plan Change 74. Council simply advised that in the Ahimia case that the land did have a form of Urban Zoning and consideration of the Ahimia land once the Plan Change was Notified was outside the scope of the Plan Change. This was never considered appropriate given that the majority of the underlying zoning was Rural Residential with a minimum 2000m² subdivision area, which does not reflect the Resource Consent held.

Submitters Vision for the Ahimia Land

- 3.4 The Submitters vision for Ahimia remains a Mixed Density Development providing for High Density Residential Development, Medium Density Development with some Lower Density Development where contour and geotechnical constraints exist. The vision includes extensive open space areas between neighbourhoods of varying densities of development. The Submitters may still vary their current Consents held but the vision remains for a mixed density development.
- 3.5 The Draft FDS makes no acknowledgement of the subject land. The Richmond map within the FDS simply shows Ahimia land as existing Rural Residential land. However land adjoining and above the subject land, area T-114 is shown as a new greenfield residential area, shown in Figure 5 below. This results in a very unusual potential future zoning pattern where land below T-114 is rural residential land and land above is being identified as future residential land.



Figure 5 - Draft FDS Map Ahimia Land below T 114

Outcomes Sought

- 3.6 The Submitters wish the Ahimia land to be identified as a residential growth option enabling a range of densities of development and a range of housing typology. The SHA process has confirmed how the land can be serviced and therefore the future of this land should be as Residential land, not left as Rural Residential with a minimum 2000m² per allotment.

4.0 SUBMISSION IN RELATION TO 218 CHAMPION ROAD / SILVAN PLACE

The Sites and Background

- 4.1 There are three titles of land accessed via 218 Champion Road / Silvan Place. One property owned by M&L Griffin comprises an area of 4.5914ha and contains the existing dwelling of Matthew and Latasha Griffin, shown in Figure 6 below.



Figure 6: M & L Griffin landholding of 4.5914 ha at 218 Champion Rd / Silvan Place

- 4.2 The other two titles are owned by Richard and Sarah Griffin comprising a total area of 165.24ha, shown in Figure 7 below.



Figure 7: R and S Griffin Land 218 Champion Rd / Silvan Place containing the Mountain Bike Park

- 4.3 The 165.24ha of land in the ownership of R&S Griffin, is the location of the Silvan Mountain Bike Park. Until recently the mountain bike park was set within an area of extensive exotic forest which has recently been harvested and replanted with a permanent plantation with a majority of natives and also including selected exotic trees. This permanent native forest is also supported by the one billion trees Government programme. Both Nelson City Council and Tasman District Council provided written support of the proposal for Silvan Forest to transition to a permanent forest. Both Councils considered that given the catchment of the forest flows into urban areas below, that erosion and mobilisation of sediment from ongoing forest harvest operations provided risk to stormwater systems. As such both Councils supported reversion back to a permanent native forest cover as significantly reducing that risk. Councils both noted the benefits in terms of alignment with enhanced indigenous biodiversity and conservation as well as greatly enhancing public recreational values for walking and cycling trails.
- 4.4 Tasman District Councils support in respect of public recreational values for walking and cycling trails noted the connection of Silvan Forest trails with Tasman District Council trails through their adjoining forest. Since the harvesting of Silvan Forest and planting of the permanent forest, Tasman District Councils Kingsland Forest, which is adjacent, is now also going through a programme of reversion back to native cover.
- 4.5 The landowners are committed to the permanent forest and are also committed to continuing the development of the mountain bike park for cyclists and walkers, in the interests of progressing this highly valued (and freely accessed) asset for the local community and Nelson Tasman in general. As part of this recreational activity there is an opportunity for other supporting activities, including the recent provision of a coffee cart which is operated at certain times to provide enhanced amenity for users of this recreational asset.

Submitters Vision

- 4.6 The Submitters vision for these landholdings as noted includes the ongoing commitment to successfully establishing a permanent forest cover and progressing the significant recreational activities that the family has privately developed to date, through the provision of trails and facilities for cyclists and walkers.
- 4.7 Over time the Submitters see further opportunities to enhance recreational activities in Silvan Forest with service activities which may develop over time into more permanent service fixtures, potentially cafes and boutique accommodation, such as lodge accommodation on suitable areas of the site, which would support the growing recreational activity within Silvan Forest.
- 4.8 Currently the zoning is Rural through this area and while the Submitters do not see the subject land as being suitable for wholesale large scale greenfield residential development, they consider that the FDS framework should be providing for recreational activity and supporting service activities for visitors attracted to Silvan Forest, which as noted, could include potential cafes and possibly boutique lodge type activities in targeted locations where they would be appropriately sited. Given the identification of T114 as a greenfield expansion area, an area just below the Submitters land, there is some scope for small scale residential enclaves in addition to accommodation lodge options.

- 4.9 The current Tasman District Council Zoning Framework under the Rural Zone, does not provide with certainty a framework for activities supporting the high numbers of visitor and recreational users to Silvan Forest. The vision as noted does not seek to pursue Residential Zoning nor full scale Business Zoning, but within the Zoning Framework to enable mix used small scale niche activities around cafes, housing and potential visitor accommodation lodges.
- 4.10 It is noted that within the Nelson Resource Management Plan, such small scale commercial activities are incorporated within the Rural Zoning Framework by enabling small areas of land within Rural Zones to be utilised for commercial activity and the submitters assert that this type of approach should also be considered under the FDS as a means to catering for some business growth through encouraging a mixed use approach in the future planning framework of both the Nelson and Tasman Review of their Resource Management Plans.

Outcomes Sought

- 4.11 The FDS should encourage a level of Business growth through a mixed use approach, that should apply to the Submitters landholdings. Provision should be incorporated into the future Zoning framework for recreational activities to be provided for as permitted activities, together with service activities for the significant numbers of visitors, cyclists and walkers attracted into Silvan Park to have opportunity for service facilities such as cafes and lodge / accommodation facilities, as well as enclaves of residential development, located within suitable locations while still maintaining the low density, high amenity, backdrop to Richmond.

5.0 HEARINGS IN RESPECT OF THESE SUBMISSIONS

- 5.1 The Submitters welcome the opportunity to be heard in respect of the above Submissions. Each of the three areas that the submissions cover are quite different in terms of future development. The Submitters therefore request speaking slots in relation to each of these Submissions and would be available to speak to these Submissions on any of the nominated dates of the 27th of April, 28th of April or 3rd of May.

Submission Summary

Nelson Tasman Future Development Strategy – Submission #31820

Debbie Bidlake

Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	28 Do you agree with the location and scale of proposed greenfield housing areas in Māpua? Please explain why.	Disagree	
TDC - Environment and Planning	02 Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements. Please explain your choice:	Agree	A low carbon future does not involve sprawling cities with ever expanding rural urban fringes. The FDS notes that in Nelson, 65% of population growth to 2052 is expected to be provided through intensification, compared with a disappointing 24% in Tasman. We support greater intensification/modernisation of cities and existing small rural towns such as Murchison, Tapawera, Takaka and Collingwood. The accessibility and vitality of these towns are important because they service rural industries and provide local housing for retirees and workers. There needs to be a greater range of housing and light commercial options in these areas.
TDC - Environment and Planning	31 Do you support the secondary part of the proposal	No	Federated Farmers is strongly opposed to the establishment of a new community near Tasman Village. As the appendices demonstrate, several areas, including T136, T166 and T168 include

	<p>for a potential new community near Tasman Village and Lower Moutere (Braeburn Road)? Please explain why.</p>		<p>high quality horticultural land (apples, pears, and grapes), and profitable sheep and beef farms. This food production potential will be lost the council allows it to be concreted over for housing. Future generations won't thank us for providing shelter and lovely views, but nowhere to grow food. Cabinet is expected to make decisions on the draft NPS on Highly Productive Land in May 2022. If approved, it will take effect from June 2022. The NPS-HPL directs councils to protect highly productive land for future generations, and from inappropriate subdivision, use and development; and to recognise the values and benefits associated with its use for primary production. The secondary proposal does neither, it merely identifies "significant loss of some highly productive land in the Coastal Tasman Areas" as a disadvantage. Plonking a greenfield settlement in the Seaton Valley on prime production land makes no sense. It would fundamentally change the character and amenity of the existing rural area. Area T168 is next to a fully functioning orchard and sheep farm owned by the Rush family. They must already deal with the reserve sensitivity effects of urban encroachment e.g., complaints about sprays, smoke, and animal smells and noises. These effects would increase exponentially with 3,200 new homes. The area would be expensive to develop from an infrastructure perspective; It has heavy clay soil so water and sewage would need to be piped from and to Motueka. And active transport infrastructure would need to be built to reduce GHG emissions. About the only thing this area really has going for it from a development perspective, is an eager developer with profit, rather than the region's best interests, at heart. Just because it might be a "shovel ready" development option, does not make it a wise choice. If new settlements must be developed, there is an abundance of hilly cut over forestry land in the district that would be far better suited to housing. In our view, these areas need to be considered first. We note that new developments in the Tasman area are not needed to meet demand even under a high growth scenario. We question why it has been included in the FDS. Our community is already over consulted and there are so many disadvantages to developing th</p>
<p>TDC - Environment and Planning</p>	<p>30 If you don't think we have the balance right, let us know what you would propose.</p>	<p>More intensification</p>	

	Tick all that apply.		
TDC - Environment and Planning	10 Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice:	Agree	Federated Farmers generally supports the FDS outcomes, in particular the prioritisation of highly productive land for primary production. It makes sense to focus greenfield development on land with limited productive potential near existing urban areas that have access to public transport, infrastructure, and services.

Submission



To: Tasman District Council

Submission on: Future Development Strategy 2022-52

Date: 14 April 2022

Contact: NELSON AND GOLDEN BAY
PROVINCES OF FEDERATED FARMERS

MARTIN O'CONNOR

WAYNE LANGFORD

Address for Service: DEBBIE BIDLAKE

INTRODUCTION

1. Federated Farmers thanks the Tasman District Council (“TDC”) for the opportunity to submit on the Future Development Strategy 2022-52.
2. We understand that this document will provide the blueprint for future urban development in the Nelson and Tasman region. We understand that the Council is working to a medium growth scenario, in which an estimated 26k new homes will be required to 2052.

3. In our view, the FDS presents an opportunity to discuss at a high level, how much growth is appropriate and sustainable in the Tasman region. That discussion would seem to be the appropriate starting point before agreeing strategies to accommodate population growth.
4. Federated Farmers interest in making this submission is to ensure that the Council:
 - Protects highly productive soils for regional food security and the resilience of future generations as directed by the draft NPS-HPL.
 - Prevents further urban encroachment on, and fragmentation of, productive land.
 - Protects farmland from reverse sensitivity effects of urban development to ensure routine work on farms can continue unimpeded.
 - Ensures public infrastructure can cope with further urban development pressure.
 - Recovers costs of any new infrastructure fairly and equitably based on who uses and benefits from those services.
 - Accommodates growth with higher density housing to create vibrant towns and lower carbon and physical footprints.

SUMMARY OF RECOMMENDATIONS

5. **That TDC:**
 - a. **Does not proceed with proposed greenfield development near Tasman village and Braeburn Road.**
 - b. **Focuses on accommodating growth by intensifying existing urban areas, including small rural towns.**
 - c. **Prioritises greenfield development on areas with limited production value, such as forestry land near existing urban centres.**
 - d. **Protects highly productive land from urban development.**

General Comments

6. A low carbon future does not involve sprawling cities with ever expanding rural urban fringes. The FDS notes that in Nelson, 65% of population growth to 2052 is expected to be provided through intensification, compared with a disappointing 24% in Tasman. We support greater intensification/modernisation of cities and existing small rural towns such as Murchison, Tapawera, Takaka and Collingwood. The accessibility and vitality of these towns are important because they service rural industries and provide local housing for retirees and workers. There needs to be a greater range of housing and light commercial options in these areas.
7. Federated Farmers generally supports the FDS outcomes, in particular the prioritisation of highly productive land for primary production. It makes sense to focus greenfield development on land with limited productive potential near existing urban areas that have access to public transport, infrastructure, and services.

SECONDARY PROPOSAL

8. Federated Farmers is strongly opposed to the establishment of a new community near Tasman Village. As the appendices demonstrate, several areas, including T136, T166 and T168 include high quality horticultural land (apples, pears, and grapes), and profitable sheep and beef farms. This food production potential will be lost the council allows it to be concreted over for housing. Future generations won't thank us for providing shelter and lovely views, but nowhere to grow food.
9. Cabinet is expected to make decisions on the draft NPS on Highly Productive Land in May 2022. If approved, it will take effect from June 2022. The NPS-HPL directs councils to protect highly productive land for future generations, and from inappropriate subdivision, use and development; and to recognise the values and benefits associated with its use for primary production. The secondary proposal does neither, it merely identifies "significant loss of some highly productive land in the Coastal Tasman Areas" as a disadvantage.¹
10. Plonking a greenfield settlement in the Seaton Valley on prime production land makes no sense. It would fundamentally change the character and amenity of the existing rural area. Area T168 is next to a fully functioning orchard and sheep farm owned by the Rush family. They must already deal with the reserve sensitivity effects of urban encroachment e.g., complaints about sprays, smoke, and animal smells and noises. These effects would increase exponentially with 3,200 new homes.
11. The area would be expensive to develop from an infrastructure perspective; It has heavy clay soil so water and sewage would need to be piped from and to Motueka. And active transport infrastructure would need to be built to reduce GHG emissions.
12. About the only thing this area really has going for it from a development perspective, is an eager developer with profit, rather than the region's best interests, at heart. Just because it might be a "shovel ready" development option, does not make it a wise choice. If new settlements must be developed, there is an abundance of hilly cut over forestry land in the district that would be far better suited to housing. In our view, these areas need to be considered first.
13. We note that new developments in the Tasman area are not needed to meet demand even under a high growth scenario. We question why it has been included in the FDS. Our community is already over consulted and there are so many disadvantages to developing this area.

Federated Farmers thanks the Tasman District Council for considering our submission on the Future Development Strategy 2022-52.

¹ Page 13, Draft Nelson Future Development Strategy 2022-52.

ABOUT FEDERATED FARMERS

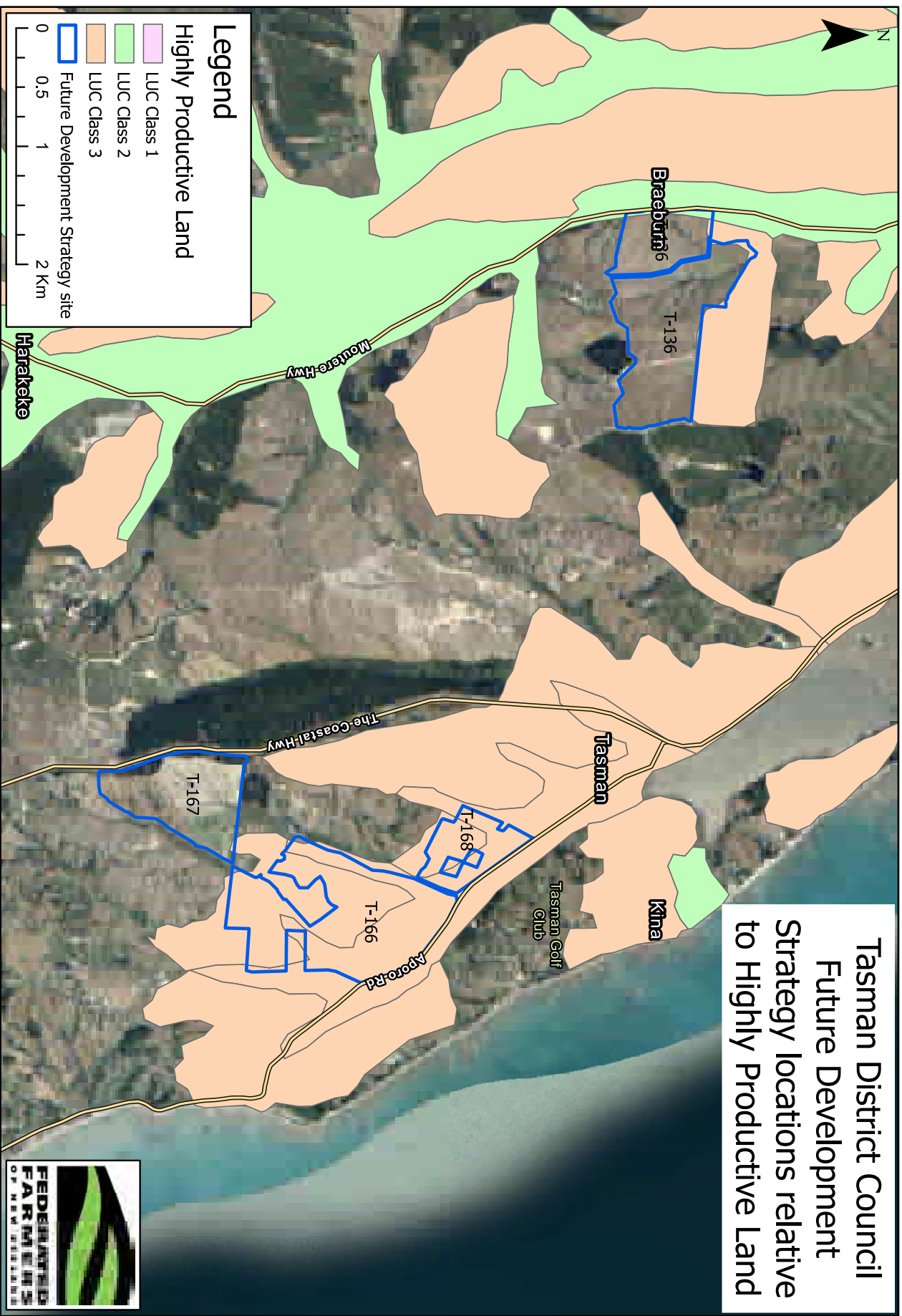
Federated Farmers is a not-for-profit primary sector policy and advocacy organisation that represents most farming businesses in New Zealand. Federated Farmers has a long and proud history of representing the interests of New Zealand's farmers.

The Federation aims to add value to its members' farming businesses. Our key strategic outcomes include the need for New Zealand to provide an economic and social environment within which:

- Our members may operate their business in a fair and flexible commercial environment.
- Our members' families and their staff have access to services essential to the needs of the rural community; and
- Our members adopt responsible management and environmental practices.

This submission is representative of member views and reflect the fact that local government rating and spending policies impact on our member's daily lives as farmers and members of local communities.





Submission Summary

Nelson Tasman Future Development Strategy - Submission #31821

Jackie McNae
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	21 Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?	Neutral	The Submitters support the identification of their land T033 as a growth area in Seaton Valley, rezoning their current rural residential landholding to residential with provision for Compact Density Development.



**FUTURE DEVELOPMENT STRATEGY
SUBMISSION ON MAPUA AS A GROWTH AREA**

Submitter:	W J & E L Lynch
Location:	
Legal Description:	
Submission:	The Submitters support the identification of their land T033 as a growth area in Seaton Valley, rezoning their current rural residential landholding to residential with provision for Compact Density Development. The Submitters have also lodged a submission to the Mapua Growth Plan Change supporting the rezoning concept.

The Submitters seek to be heard in support of their submission.

Dated this 14th day of April 2022

.....
(Signed by the Submitter’s authorised agent)

Address for Service:
Staig & Smith Ltd

Submission Summary

Nelson Tasman Future Development Strategy – Submission #31823

Rob Wilks

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>See attached.</p> <p>This response is particular to our (Tasman) area, but the same arguments could be said for other areas affected by urban sprawl/ greenfield land development.</p> <p>The covenants imposed on us will be unfairly lifted of other developers.</p> <p>We chose to invest in a home here because of the “Rural Character” of the area and this is now threatened.</p> <p>Lack of availability of required infrastructure.</p> <p>Effects on Climate Change.</p> <p>Increased contaminant and flood risk.</p> <p>There is no denying that there needs to be something done about New Zealand's current housing crisis. However, developing large, residential areas with low population density is not the answer. There is growing evidence that high density, multistorey development is the best way to combat the housing shortage and provide affordable homes. These areas need to be close to amenities such as supermarket, schools, and Medical centre's to encourage active transport, and reduce the number of cars on the roads.</p> <p>Is there any reason why we must relieve the pressure on housing in New Zealand by providing housing in this relatively unspoilt area?</p> <p>There must be more suitable land in other areas in New Zealand for growth without sprawling subdivisions across the hills around here.</p>

Rob Wilks - Sub # 31823 - 1

Rob Wilks
Sally Murdoch

I would like to share our views on the Tasman District Councils (TDC) Submission on the Future Development Strategy (FDS) as residents in the area.
This response is particular to our (Tasman) area, but the same arguments could be said for other areas affected by urban sprawl/ greenfield land development

I understand that there is an obligation (and therefore pressure) on the councils to plan for projected growth in the area. Consulting the affected party's is part of the process.

The covenants imposed on us will be unfairly lifted of other developers.

When we developed our property there were significant restrictions in what we could do based on how our development would affect our neighbours and ensuring we kept the "rural character" This included the colour of our house, its reflective value, the height of the house, and limiting structures on the ridgeline. Although I appreciate these now, I feel that all those of us who have developed under these covenants have been short changed- if development within our line of sight are not subjected to the same restrictions.

We chose to invest in a home here because of the "Rural Character" of the area and this is now threatened.

When we were considering where to settle, the peace, privacy and quiet of this area appealed to us as this was an important consideration.
We had a significant financial investment into the area because of this attraction, now we, and many of our neighbours are concerned this will be compromised.
We acknowledge there will be a gradual increase in development, but not enough to completely alter the "feel" of the area.
We are now considering if this will be an area we will want to stay in long term if the proposal goes ahead.

Lack of availability of required infrastructure.

With a proposal for significant development, it assumes that there will be no impediments or downstream effects.
Currently there is a significant shortage of tradesmen (and more recently materials) across the range required to build homes.
What about schools, General Practices (currently there are waiting lists to see a Doctor in Tasman area), social services and Transport?
A proposal that looks at the end product (homes) and not the resources and services required is very short sighted and reckless.

Effects on Climate Change.

With unrestricted and poorly planned growth, there are significant impediments to us not reducing our carbon footprint in the way of building materials and waste, increased number of vehicles on the road, reduced greenspace/wetlands, reduced opportunity to develop regeneration of native species both flora and fauna, more household emissions, increased urban heat island affect.

Increased contaminant and flood risk.

Housing development leads to increased proportion of impervious areas leading to greater volume of stormwater runoff. If poorly managed, not only does this increase flood risk, but greater contaminants in run off.

Why this area?

There is no denying that there needs to be something done about New Zealand's current housing crisis. However, developing large, residential areas with low population density is not the answer. There is growing evidence that high density, multistorey development is the best way to combat the housing shortage and provide affordable homes. These areas need to be close to amenities such as supermarket, schools, and Medical centres to encourage active transport, and reduce the number of cars on the roads.

Is there any reason why we must relieve the pressure on housing in New Zealand by providing housing in this relatively unspoilt area?

There must be more suitable land in other areas in New Zealand for growth without sprawling subdivisions across the hills around here.

Thankyou for considering our views

Rob & Sally

Submission Summary

Nelson Tasman Future Development Strategy – Submission #31826

Dan Hames
Speaker? True

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		<p>See attachment - requests that the master plan for Port Taroako and surrounding land is noted in the FDS, that the FDS flags that the existing urban area identified at Taroako is subject to a TDC led master plan and these boundaries may change as a result of landowner consultation, PTSL/PTL are included in the Tasman Coastal Group, the Taroako Harbour Area is shown as Council reserve land on the FDS maps.</p> <p>Port Taroako Ltd limits its submission to: Pohara to Ligar Bay area, Golden Bay.</p> <p>TDC planners have consistently underestimated the growth of this area. This area is a thriving, growing community.</p> <p>Over the last 30 years this community has endeavoured to work with the TDC to produce a master plan that considers the wellbeing of the communities and the operation of Port Taroako. The reports from these meetings have been shelved and the residents, recreation Port users and industry opinions all need to be heard.</p> <ul style="list-style-type: none"> ▪ A master plan for this area should include Port Taroako, the adjacent communities and the adjacent PTL land. The TDC has concentrated on development plans for their Port land and the aquaculture industry's specific requirements in isolation without consideration of the wider community interests. <p>This land offers a unique opportunity to provide a</p>

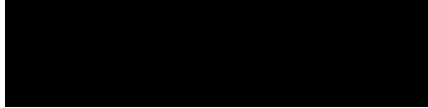
			<p>mixed-use development area to support an adjacent Port and meets every outcome sought by the FDS.</p> <ul style="list-style-type: none">▪ The property should be included in this FDS consultation and the current FDS map needs to be updated to reflect the feasible opportunities for urban land use by adjusting the zoning boundaries presently drawn on the property while considering cross-boundary sensitivity issues with the neighbouring residential communities.
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Port Tarohe Ltd - Sub# 31714 - 2



14 April 2022

PORT TARAKOHE SERVICES LIMITED



SUBMISSION ON DRAFT TASMAN DISTRICT COUNCIL FUTURE DEVELOPMENT STRATEGY

This submission relates to Port Tarohe and the surrounding land to support the growth of aquaculture, recreation, and tourism in Golden Bay.



Photo 1: Aerial view of the Port and surrounding land at Tarohe, Eastern Golden Bay.



1. BACKGROUND

- In 2001 Port Tarakohe Ltd (PTL) purchased 82 hectares of land from the Golden Bay Cement Company Limited (GBCC) who operated a cement works on the site between 1910 and 1988. During this time, they extracted high quality limestone rock from the quarry for the production of cement.
- Since the purchase, the property has been extensively rehabilitated over a 20-year timeframe. The only remnant infrastructure of the GBCC works are two water tanks and a water weir, six cement silos overlooking Port Tarakohe, and an industrial storage shed at the head of the harbour.
- The property also contains the Tarakohe Quarry (owned by PTL) which has been in operation for over 110 years under existing use rights. A large proportion of the quarry area is zoned Light Industrial and is surrounded by Rural 2 and Open Space zoning. This land was originally entirely zoned for industrial purposes.
- At present, limestone rock is quarried for roading gravel (AP20 – AP100), approved foundations, face run for hard fill and large rock for protection work providing a valuable rock resource for eastern Golden Bay.
- The operational limestone quarry within PTL’s property boundaries also assists with on-site land development and rehabilitation.
- Port Tarakohe Services Ltd (PTSL) manages the site for PTL.
- PTSL leases land to various tenants. Solly’s Contracting Ltd operate the hard rock quarry and several aquaculture companies lease land for their on-land operations and storage of marine gear.

2. DRAFT FUTURE DEVELOPMENT STRATEGY 2022-2052

- PTSL suggests including a reference in the TDC draft Future Development Strategy 2022-2052 (FDS) noting *“Aquaculture, recreational and tourism growth and infrastructure needs for Port Tarakohe and the surrounding land between Pohara Valley Road and Ligar Bay will be addressed through a master plan for the area and subsequent Tasman Environment Plan process.”*
- In the drafting of the FDS, it seems Tarakohe’s industrially zoned land was only taken into account when determining if, and how much additional land might be required for future growth in the area and possibly for just one growth sector (aquaculture).

3. MASTER PLAN

- The strategic importance of Port Tarakohe and the adjacent land needs to be carefully planned for via a master plan to ensure that industry growth demands can be met with appropriate infrastructure and environmental controls in place, while accounting for the needs of the community and manawhenua iwi.
- TDC is working with central government, iwi and industry to understand the aquaculture industry’s needs and aspirations in the Tasman Region (refer to the Tasman Aquaculture Review – June 2021).
- TDC has also formed the Tasman Coastal Group – *“The purpose of the group is to bring together a range of people who have a depth of knowledge or broad interests in the coastal marine space, who can provide varied experience, and who can contribute to the development of coastal policy for the Tasman Environment Plan. The group will provide a source of information to understand coastal users’ needs and desires, act as a sounding board for defining issues and options, and provide a range of perspectives to test potential management approaches when planning provisions are being developed”.*
- As a major landowner/manager/stakeholder, PTSL/PTL should be part of this group to better understand the aquaculture, recreational, tourism, community, iwi and Council needs in how this strategic land can be best used to support their interests.



- PTSL has continually pressed the importance to TDC and central government that development of Port Tarakohe and the adjacent land needs to support three important growth sectors - aquaculture, recreation and tourism (cultural, environmental and educational).
- Any future re-zoning of this land should address all three sectors to better the social, economic, environmental and cultural outcomes for the Golden Bay community.
- TDC has indicated they are preparing a master plan for the Tarakohe area as part of the Tasman Environment Plan process.

4. FDS MAPPING

- The online interactive FDS maps reflect an existing urban area over Port Tarakohe and the adjacent land (currently zoned Light Industrial).



Map 1: FDS interactive map of Tarakohe.

- Any future development at Tarakohe within the urban mapped area shown on **Map 1** (inside the **blue outline**) will be limited by geography (flat land verses hilly terrain and instability areas) and Council planning restrictions (Outstanding Natural Features/Coastal Environment overlays and zoning).
- Based on these constraints, approximately 80% of the mapped Tarakohe area is not geographically suitable for urban/commercial/business development.



Map 2: PTL land titles represented by yellow boundary lines.

- The 82 hectares of privately owned land shown on **Map 2** is a mix of Light Industrial, Rural 2 and Open Space zoned land. Of the 82 hectares, only **12 hectares** (approximately) is currently geographically suitable for urban/commercial/business development (approximately **4 hectares** of which fall outside of the Tarakohe urban FDS mapped area shown on **Map 1**). Therefore, the FDS maps either need to be reconfigured for their inclusion or addressed via the proposed TDC master plan.
- Additional PTL land can be made available with appropriate rehabilitation.
- TDC’s Tasman Aquaculture Review report (June 2021) notes the *“Lack of land around the port for storage and land bases, and uncertainty of access to the existing land (noting that storage requirements are greater in Tasman and Golden bays because the sea conditions mean that all floats need to be brought onshore following harvest, and that ancillary services such as engineering for vessels and vessel machinery also need land close to the port)”*.
- To address the above, TDC has indicated it may introduce a Port Zone over the industrial land at Tarakohe to provide more certainty that this land will be used for marine-related purposes and to meet the National Planning Standards framework. PTSL would be supportive of the proposed Port Zone if it provides for marine-related industrial, commercial, tourism and recreational activities.
- The TDC’s Port land and harbour area is vested as a local purpose reserve for development as a working harbour and recreational area. This is not shown as Council reserve land on the interactive FDS Maps which should be updated to reflect its reserve status.



- Any Port Zoning in the future should protect the marine-related recreational use of the western Port arm given the underlying vesting requirements.

5. PTSL LAND ASPIRATIONS

- PTSL provided TDC and central government with an aspirational strategic planning document “Mohua Encounters” back in 2018 as part of a Provincial Growth Fund application.
- Mohua Encounters envisages a multi-use Port for marine-related aquaculture, recreation and tourism.
- PTSL was a co-funder of TDC’s Port Tarohe Business Case (2019) on the agreement that the planning and services for Tarohe enabled both development of the Port and relevant land development areas of Mohua Encounters through the creation of an overall master plan.
- That the Tarohe quarry remains an important hard rock resource for eastern Golden Bay over the next 30 years.

6. FDS SUBMISSION OUTCOMES

- In summary, PTSL seeks the following outcomes on the draft FDS:
 - The proposed master plan for Port Tarohe and surrounding land is noted in the FDS.
 - The FDS flags that the existing urban area identified at Tarohe is subject to a TDC led master plan and these boundaries may change as a result of landowner consultation.
 - PTSL/PTL are included in the Tasman Coastal Group.
 - The Tarohe harbour area is shown as Council reserve land on the FDS maps.

Submission Summary

Nelson Tasman Future Development Strategy – Submission #31830

K.M. McDonald

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	01 Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in GHG emissions by integrating land use transport. Please explain your choice:	Don't know	Please see attached.. Reduction in greenhouse gas emissions is not achieved by population growth (rapid, or major), nor by depleting resources needed to support this. A jargon filled, loaded, leading proposal.
TDC - Environment and Planning	02 Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements.	Strongly disagree	Please see attached.. Intensification destroys the character of areas people choose to live in because of pleasant suburban areas, not high rise apartments which destroy outlook - buildings, not hills or sky.

	Please explain your choice:		
TDC - Environment and Planning	03 Please indicate whether you support or do not support Outcome 3: New housing is focussed in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice:	Agree	Please see attached.. This assumes that major growth is inevitable and a good thing. New housing demands earth's resources and contributes to global warming/climate change.
TDC - Environment and Planning	04 Please indicate whether you support or do not support Outcome 4: A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable options. Please explain your choice:	Agree	Please see attached.. Housing choices should include off-street parking for private vehicles. Public transport is not an option for some people. "Affordable" housing won't happen while development is in the hands of bankers and developers chasing excessive profits.
TDC - Environment and Planning	05 Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand. Please explain your choice:	Agree	The assumption that "a high growth pattern continues into the future" is not necessarily correct. Recent trends are showing a slowing of population growth.
TDC - Environment and Planning	06 Please indicate whether you support or do not support Outcome 6: New infrastructure is planned, funded	Neutral	See response to #5.

	and delivered to integrate with growth and existing infrastructure is used efficiently to support growth. Please explain your choice:		
TDC - Environment and Planning	07 Please indicate whether you support or do not support Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice:	Agree	Intensification has a maximum impact on the natural environment. Tiny sections offer little opportunity for restoration.
TDC - Environment and Planning	08 Please indicate whether you support or do not support Outcome 8: Nelson Tasman is resilient to and can adapt to the likely future effects of climate change. Please explain your choice:	Agree	Large-scale development contributes to the adverse effects of climate change e.g silting of waterways, roads and footpaths can't soak up floodwaters.
TDC - Environment and Planning	09 Please indicate whether you support or do not support Outcome 9: Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice:	Agree	More concrete, bitumen, roads, buildings make an area less resilient to natural hazards.
TDC - Environment and Planning	10 Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary	Agree	Larger sections can be highly productive, unrestrained, large scale development must not be allowed on land which is used for food production in a sustainable way.

	production. Please explain your choice:		
TDC - Environment and Planning	11 Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice:	Agree	Large-scale development has a very negative impact on waterways and bodies. It does not revive and enhance the mauri of te taiao, which necessarily includes te tangata.
TDC - Environment and Planning	12 Regarding the FDS outcomes, do you have any other comments or think we have missed anything?		Intensification as of right without notification or right of objection is an erosion of our democratic rights. This is a very biased submission form. The pretty pictures in no way represent the reality of intensive development. The pleasant outlook of hills, sea and sky are being replaced by views of tall buildings, not conducive to people's wellbeing.
TDC - Environment and Planning	15 Do you agree with prioritising intensification within Nelson? This level of intensification is likely to happen very slowly over time. Do you have any comments?	Strongly disagree	I do not support this proposal. It mainly benefits developers and bankers and construction companies. People on low incomes will be further shut out from affordable housing.
TDC - Environment and Planning	22 Do you agree with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.	Strongly disagree	I strongly object to intensive development in the Matai Valley. If this is "developed" it's gone forever. The area would be ideal for a regional park, enhancing the wellbeing of our citizens and visitors.
TDC - Environment and Planning	24 Do you agree with the location and scale of proposed greenfield housing areas in Richmond? Please explain why.	Strongly disagree	The large new housing areas to the left of lower queen street are an example of exactly what should not be allowed - flood prone land, removal of productive land, sections too small for tress, concrete instead of natural plantings and restoration.
TDC - Environment and Planning	29 Do you think we have got the balance right in our core proposal between	Strongly disagree	

	intensification and greenfield development? (Approximately half intensification, half greenfield for the combined Nelson Tasman region.)?		
TDC - Environment and Planning	30 If you don't think we have the balance right, let us know what you would propose. Tick all that apply.	Less intensification	
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		Nobody I know wants our region to grow to the extent that is being envisaged. Tauranga would be a good (negative) example of large scale growth. There is no guarantee that intensification will happen "very slowly over time", "Build it and they will come". The FDS is a blueprint for developers to destroy the character and values of our region forever; for the rich to get richer at the expense of the poor.

K.M. McDonald - Sub#31830

SUBMISSION FORM

DRAFT NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022–2052

You can also fill out this survey online. Please see the link at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Name: K.M. McDonald I wish to be informed if hearings are in person.

Organisation represented (if applicable): Please write or phone - 9 a.m. is good.

Address: [REDACTED]

Email: [REDACTED]

Do you wish to speak at a hearing? Yes No If yes, which date? 27 April 28 April 3 May

Hearings are scheduled for 27 April, 28 April and 3 May and are likely to be online rather than in person due to the current Red setting in the Covid Protection Framework and in order to keep everyone safe. If you do not tick one date, we will assume you do not wish to be heard. If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please indicate here: Te Reo Māori New Zealand sign language

Public information: All submissions (including the names and contact details of submitters) are public information and will be available to the public and media in various reports and formats including on the Councils' websites. Personal information will also be used for administration relating to the subject matter of submissions. Submitters have the right to access and correct any personal information included in any reports, information or submissions. The Councils will not accept anonymous submissions or any submissions containing offensive content.

1. Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in greenhouse gas emissions by integrating land use transport. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Reduction in greenhouse gas emissions is not achieved by population growth (rapid, or major), nor by depleting resources needed to support this. A jargon-filled, loaded, leading proposal

2. Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Intensification destroys the character of areas. People choose to live in Nn because of pleasant suburban areas, not high rise apartments which destroy the outlook - buildings, net hills or sky.

3. Please indicate whether you support or do not support Outcome 3: New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice. A very leading "option" for answers

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

This assumes that ^{major} growth is inevitable and a good thing. New housing demands earth's resources & contributes to global warming / climate change

** see back page*



4. Please indicate whether you support or do not support Outcome 4: A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable options. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Housing choices should include off-street parking for private vehicles. Public transport is not an option for some people. "Affordable" housing won't happen while development is in the hands of bankers and developers chasing excessive profits

5. Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

The assumption that "a high growth pattern continues into the future" is not necessarily correct. Recent trends are showing a slowing of population growth

6. Please indicate whether you support or do not support Outcome 6: New infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

see response to # 5

7. Please indicate whether you support or do not support Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Intensification has maximum impact on the natural environment. Tiny sections offer little opportunity for restoration

8. Please indicate whether you support or do not support Outcome 8: Nelson Tasman is resilient to and can adapt to the likely future effects of climate change. Please explain your choice.

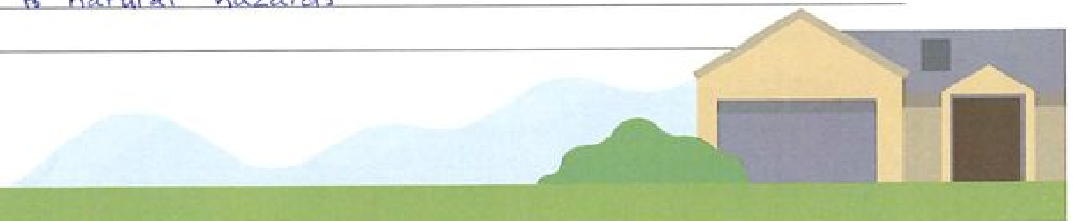
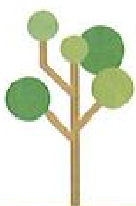
- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Large-scale development contributes to the adverse effects of climate change e.g. silting of waterways, roads & footpaths can't soak up floodwaters

9. Please indicate whether you support or do not support Outcome 9: Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

More concrete, bitumen, roads, buildings make an area less resilient to natural hazards



10. Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Larger sections can be highly productive. Unrestrained, large-scale development must not be allowed on land which is used for food production in a sustainable way.

11. Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiāo. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Large-scale development has a very negative impact on waterways & bodies. It does not revive & enhance the mauri of te taiāo, which necessarily includes te tangata.

12. Regarding the FDS outcomes, do you have any other comments or think we have missed anything?

"Intensification as of right without notification or right of objection is an erosion of our democratic rights." This is a very biased submission form. The pretty pictures in no way represent the reality of intensive development. The pleasant outlook of hills, sea & sky are being replaced by views of tall buildings, not conducive to people's wellbeing

13. Do you support the proposal for consolidated growth along State Highway 6 between Atawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

14. Where would you like to see growth happening over the next 30 years? Tick as many as you like.

- Largely along the SH6 corridor as proposed
- Intensification within existing town centres
- Expansion into greenfield areas close to the existing urban areas
- Creating new towns away from existing centres (if so, tell us where): _____
- In coastal Tasman areas, between Māpua and Motueka
- In Tasman's existing rural towns
- Everywhere
- Don't know



15. Do you agree with prioritising intensification within Nelson? This level of intensification is likely to happen very slowly over time. Do you have any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

I do not support this proposal. It mainly benefits developers & bankers & construction companies. People on low incomes will be further shut out from affordable housing

16. Do you agree with the level of intensification proposed right around the centre of Stoke? Any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

17. Do you agree with the level of intensification proposed in Richmond, right around the town centre and along McGlashen Avenue and Salisbury Road? Any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

18. Do you agree with the level of intensification proposed around the centre of Brightwater? Any comments?

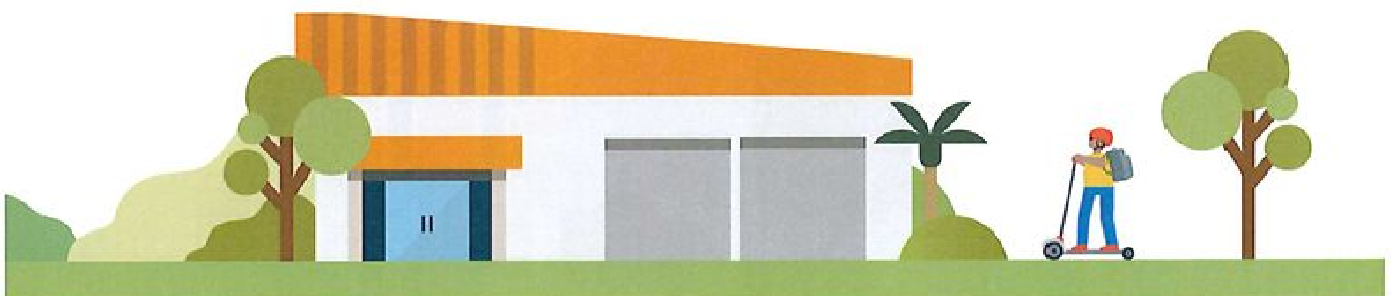
- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

19. Do you agree with the level of intensification proposed near the centre of Wakefield? Any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

20. Do you agree with the level of intensification proposed in Motueka (greenfield intensification and brownfield intensification)? Any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know



21. Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

22. Do you agree with the location and scale of the proposed greenfield housing areas in Nelson?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

*I strongly object to intensive development in the Maitai Valley.
IF this is "developed" it's gone forever. The area would be ideal for a regional park, enhancing the wellbeing of our citizens & visitors.*

23. Do you agree with the location and scale of the proposed greenfield housing areas in Stoke?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

24. Do you agree with the location and scale of the proposed greenfield housing areas in Richmond?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

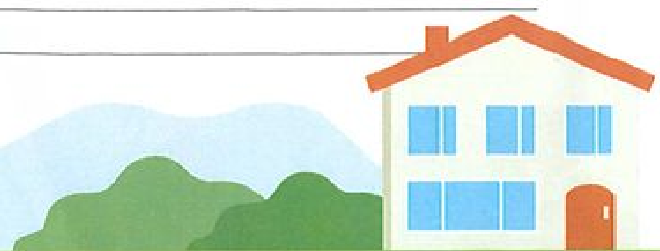
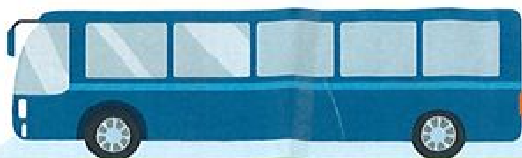
The large new housing areas to the left of Lower Queen St are an example of exactly what should not be allowed - flood prone land, removal of productive land, sections too small for trees, concrete instead of natural plantings and restoration

25. Do you agree with the location and scale of the proposed greenfield housing areas in Brightwater?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

26. Do you agree with the location and scale of the proposed greenfield housing areas in Wakefield?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know



27. Do you agree with the location and scale of the proposed greenfield housing areas in Motueka?

Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

28. Do you agree with the location and scale of the proposed greenfield housing areas in Māpua?

Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

29. Do you think we have got the balance right in our core proposal between intensification and greenfield development (approximately half intensification, half greenfield for the combined Nelson Tasman region)?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

30. If you don't think we have got the balance right, let us know what you would propose. Tick all that apply.

- More intensification Less intensification More greenfield expansion Less greenfield expansion

31. Do you support the secondary part of the proposal for a potential new community near Tasman Village and lower Moutere (Braeburn Road)? Please explain why.

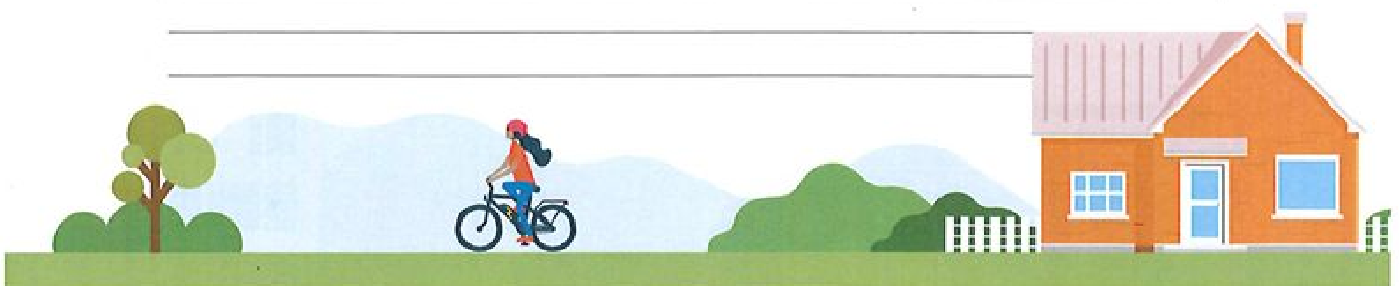
- Yes No Don't know Yes provided agreement can be reached with Te Ātiawa

32. Do you agree with the locations shown for business growth (both commercial and light industrial)?

Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

33. Let us know if there are any additional areas that should be included for business growth or if there are any proposed areas that you consider are more or less suitable.



34. Do you agree with the proposed residential and business growth sites in Tākaka?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

35. Do you agree with the proposed residential and business growth sites in Murchison?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

36. Do you agree with the proposed residential and business growth sites in Collingwood?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

37. Do you agree with the proposed residential and business growth sites in Tapawera?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

38. Do you agree with the proposed residential and business growth sites in St Arnaud?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

39. Let us know which sites you think are more appropriate for growth or not in each rural town. Any other comments on the growth needs for these towns?

40. Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?

Nobody I know wants our region to grow to the extent that is being envisaged. Tauranga would be a good (negative) example of large scale growth. There is no guarantee that intensification will happen "very slowly over time," "Build it and they will come". The FDS is a blueprint for developers to destroy the character and values of our region forever, for the rich to get richer at the expense of the poor.

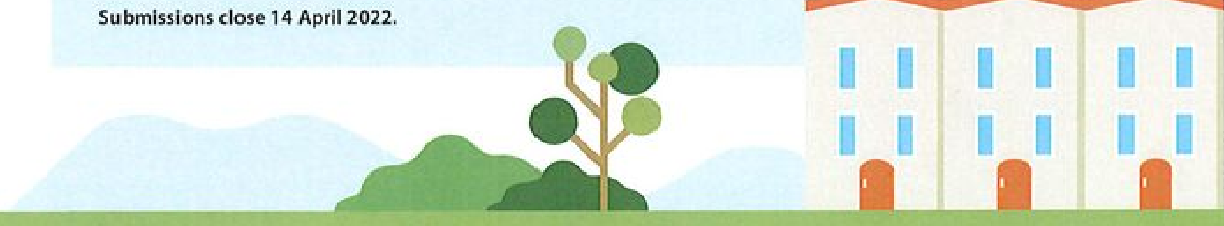
It's important to have your say on the big choices.

Once you've filled out this submission form:

- Email it to futuredevelopmentstrategy@ncc.govt.nz or futuredevelopmentstrategy@tasman.govt.nz.
- Post it to Tasman District Council, 189 Queen Street, Private Bag 4, Richmond 7050 or Nelson City Council, PO Box 645, Nelson 7040.
- Drop it off to your nearest customer service centre for either Tasman District or Nelson City Council.

Alternatively, you can fill out the survey online. A link is provided at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Submissions close 14 April 2022.



* Agreeing with a proposal e.g. #3 does not imply that I support intensive development. This proposal is an example of how leading the proposals are; ~~supporting~~^{comp.wers} appearing to support a proposal although disagreeing with the implications. The proposals are slanted towards getting answers that support the F.D.S. agenda.

Received at Nelson City Council

14/04/2022 1:04:43 PM

Counter

Sue Garside

1000029600

Submission Summary

Nelson Tasman Future Development Strategy - Submission #31834

Nic John Jo Tuffery

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		Please see attached for further detail

L - 31834 - 1 - Nic John and Jo Tuffery

Received at Nelson City Council

19/04/2022 8:30:24 AM

mail

Hannah M

1000029615

SUBMISSION FORM

DRAFT NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022–2052

You can also fill out this survey online. Please see the link at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Name: Nic John & Jo Tuffery

Organisational: [Redacted]

[Redacted]

Do you wish to speak at a hearing? Yes No If yes, which date? 27 April 28 April 3 May

Hearings are scheduled for 27 April, 28 April and 3 May and are likely to be online rather than in person due to the current Red setting in the Covid Protection Framework and in order to keep everyone safe. If you do not tick one date, we will assume you do not wish to be heard. If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please indicate here: Te Reo Māori New Zealand sign language

Public information: All submissions (including the names and contact details of submitters) are public information and will be available to the public and media in various reports and formats including on the Councils' websites. Personal information will also be used for administration relating to the subject matter of submissions. Submitters have the right to access and correct any personal information included in any reports, information or submissions. The Councils will not accept anonymous submissions or any submissions containing offensive content.

See attached sheet

1. Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in greenhouse gas emissions by integrating land use transport. Please explain your choice.

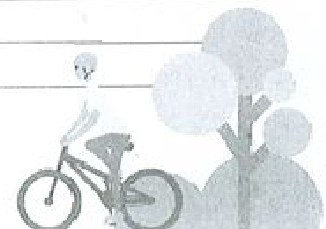
Strongly agree Agree Neutral Disagree Strongly disagree Don't know

2. Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of shorter settlements. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

3. Please indicate whether you support or do not support Outcome 3: New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know



SUBMISSION TO THE DRAFT NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022 - 2052

From: Nic John and Jo Tuffery

Address: [REDACTED] g [REDACTED] n

Email: [REDACTED] z

Introduction

The topic of development and intensification is multi-factored and needs considerable effort, thought and planning to effectively achieve the desired key outcome of the National Policy Statement on Urban Development 2020:

Objective 1: New Zealand has well-functioning urban environments that enable all people and communities to provide for their social, economic, and cultural wellbeing, and for their health and safety, now and into the future.

To achieve the objective will require the building of safe, resilient and thriving communities, and this should be the guiding principle of the strategy.

Key points:

- The draft proposes to create more 'villages', and this is to be encouraged. At the heart of a village is a community. Further, different communities will have different needs and these need to be valued and accommodated. We agree with this.
- The current draft strategy is a significant change from the previous strategy. Of particular note is the massive shift to intensify the area previously known as the 'the Nile' and the area up Collingwood St and across to Trafalgar St. This degree of intensification will significantly change the amenity value of these areas. This is not balanced growth. We strongly disagree with this.
- The shift in housing typology in the 'the Nile' and Collingwood St/Trafalgar St area is of a major concern. The previous strategy recognised that single story housing was the most suitable, however the new strategy has seen a major change to up to six story buildings. This will destroy both the amenity value and the character of this area. This is not balanced growth. We strongly disagree with this.
- The strategy is not specific enough. While some areas identified for growth will be able to absorb the negative effects, i.e. placing multi-story buildings against hillsides to reduce their impact, this is not the case across an area. The impact of a multi-story buildings on flatter areas will result in a loss of amenity and character value. This is not balanced growth.
- The strategy is not considered enough. Intensification based on jobs is mis-leading. For instance, a considerable number of businesses, and therefore employers, don't occur in the central city, and therefore intensifying these areas in the belief that housing will be close to employment opportunities is wrong. More granular assessments need to be made.
- Other factors need to be considered, e.g. schooling. Many schools in certain areas are at capacity, therefore introducing greater intensity into those areas will not be able to be accommodated by other parts of the social system like schools. More granular assessments need to be made.

- No consideration has been given to the social side of this change. Intensification can cause considerable social problems
- No consideration has been given to those that may be significantly affected by considerable change. While the needs of the developers and others who stand to benefit from these changes have been taken into account, those that are likely to bear the cost are not provided the same degree of consideration.
- The draft strategy mentions amenity only four times, mostly referencing the coastal environment, yet fails to address this in the urban environment. There needs to be a greater balance between development and amenity values.
- The draft strategy mentions heritage only once, in relation to Motueka. Heritage is a matter of national importance under the RMA and must be accounted for in the proposed strategy. It is noted that we hold the heritage on behalf of future generations, and that the links to the past are valued.
- The significant shift in intensification focus areas from the previous strategy does not enable residents to plan or prepare for changes. The concept of a Future Development Strategy says that the ability to plan should be the case.
- The Nelson City Council seem interested in being allowed to undertake development applicable to Tier 1 urban environments. Nelson Tasman is a completely different situation and residents live in Nelson Tasman often because it is not a Tier 1 urban environment, and its standing as a Tier 2 urban environment should be respected.
- The costs of intensification are not likely to be borne equally by all residents, either within an area of intensification or across the region. For some, neighbourhood development will mean a considerable cost to amenity and economic values, while others will not be affected at all. This inequity is not accounted for, not is it fair and reasonable. Further, while overall there may be a 'slow change' to an area, the change for those actually residing next to development will occur more rapidly.
- The planning horizon of the strategy is 30 years, with the shortfall anticipated in the long term. Between now and then lies considerable uncertainty. Changes to intensification should be more staged than the current proposal and enable better decision making to occur as uncertainties resolve themselves.
- There is a considerable trade-off being made between productive land and development. A more holistic approach nationally would recognise that not all areas contribute in the same way, i.e. not all regions have significant areas of productive land, and therefore a more national plan should be made for this trade-off rather than every area being considered the same.
- In conjunction with the development of this strategy is the new Nelson Plan. This plan is going to reduce the input and say of residents about development through the use of 'complying' or 'restricted discretionary' activities. We strongly disagree with this.

Submission Summary

Nelson Tasman Future Development Strategy - Submission #31835

Mr Ian Wishart

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	01 Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in GHG emissions by integrating land use transport. Please explain your choice:	Strongly agree	
TDC - Environment and Planning	02 Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements.	Agree	Please see attached - All depends on appropriate design & architecture, need novel imaginative ideas put before public.

	Please explain your choice:		
TDC - Environment and Planning	03 Please indicate whether you support or do not support Outcome 3: New housing is focussed in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice:	Agree	
TDC - Environment and Planning	04 Please indicate whether you support or do not support Outcome 4: A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable options. Please explain your choice:	Strongly agree	Please see attached: Facilitate people into tiny homes, unusual style homes, communal homes. Please do not encourage the continuation of building the large mansions by the large building companies.
TDC - Environment and Planning	05 Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand. Please explain your choice:	Agree	Please see attached: Only in line with your work in section 14.2
TDC - Environment and Planning	06 Please indicate whether you support or do not support Outcome 6: New infrastructure is planned, funded	Agree	

	and delivered to integrate with growth and existing infrastructure is used efficiently to support growth. Please explain your choice:		
TDC - Environment and Planning	07 Please indicate whether you support or do not support Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice:	Strongly agree	
TDC - Environment and Planning	08 Please indicate whether you support or do not support Outcome 8: Nelson Tasman is resilient to and can adapt to the likely future effects of climate change. Please explain your choice:	Strongly agree	
TDC - Environment and Planning	09 Please indicate whether you support or do not support Outcome 9: Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice:	Strongly agree	
TDC - Environment and Planning	10 Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary	Strongly agree	

	production. Please explain your choice:		
TDC - Environment and Planning	11 Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice:	Neutral	
TDC - Environment and Planning	12 Regarding the FDS outcomes, do you have any other comments or think we have missed anything?		Please see attached for further detail: Yes intensification cannot beget the idea of how & what. Few people want to live in ?? or ??. Please see final comments at end of submission.
TDC - Environment and Planning	13 Do you support the proposal for consolidated growth along SH6 between Atawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?	Disagree	Please see attached: I oppose all greenfield expansion. I request TDC to reduce, minimize allotment sizes on Rural 1,2,3 & Rural Residential.
TDC - Environment and Planning	14 Where would you like to see growth happening over the next 30 years? Please list as many of the following options that you agree with: (a) Largely along the SH6 corridor as proposed (b) Intensification		Ticked: Intensification within existing town centres as long as well done. Ticked: In Tasman's existing rural towns.

	<p>within existing town centres (c) Expansion into greenfield areas close to the existing urban areas (d) Creating new towns away from existing centre (please tell us where) (e) In coastal Tasman areas, between Mapua and Motueka (f) In Tasman's existing rural towns (g) Everywhere (h) Don't know</p>		
TDC - Environment and Planning	<p>15 Do you agree with prioritising intensification within Nelson? This level of intensification is likely to happen very slowly over time. Do you have any comments?</p>	Agree	Nelson is not Paris or Berlin and river city living has minimal appeal for most, but does appeal to some, needs to be one of many options.
TDC - Environment and Planning	<p>16 Do you agree with the level of intensification proposed right around the centre of Stoke? Any comments?</p>	Disagree	Please no to 6 storey buildings in the area around Andrew St & mid-Songer St.
TDC - Environment and Planning	<p>17 Do you agree with the level of intensification proposed in Richmond, right around the town centre and along McGlashen Avenue and Salisbury Road? Any comments?</p>	Agree	As long as well done. please no future slums.
TDC - Environment and Planning	<p>18 Do you agree with the level of intensification proposed around the centre of Brightwater? Any comments?</p>	Agree	
TDC -	<p>19 Do you agree</p>	Agree	

Environment and Planning	with the level of intensification proposed near the centre of Wakefield? Any comments?		
TDC - Environment and Planning	20 Do you agree with the level of intensification proposed in Motueka? (greenfield intensification and brownfield intensification) Any comments?	Neutral	Motueka too close to sea level to allow much growth at all.
TDC - Environment and Planning	21 Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?	Neutral	It is inevitable Mapua is a future hot spot & I care little for it so do whatever you like.
TDC - Environment and Planning	22 Do you agree with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.	Neutral	NCC has little option but to build on terraces below Barnicoat range & Atawhai. Please no more bespoke massed house. Get creative guys.
TDC - Environment and Planning	24 Do you agree with the location and scale of proposed greenfield housing areas in Richmond? Please explain why.	Neutral	
TDC - Environment and Planning	25 Do you agree with the location and scale of proposed greenfield housing areas in Brightwater? Please explain why.	Neutral	
TDC - Environment and Planning	26 Do you agree with the location and scale of proposed	Neutral	

	greenfield housing areas in Wakefield? Please explain why.		
TDC - Environment and Planning	27 Do you agree with the location and scale of proposed greenfield housing areas in Motueka? Please explain why.	Disagree	
TDC - Environment and Planning	28 Do you agree with the location and scale of proposed greenfield housing areas in Māpua? Please explain why.	Neutral	Don't care about Mapua
TDC - Environment and Planning	31 Do you support the secondary part of the proposal for a potential new community near Tasman Village and Lower Moutere (Braeburn Road)? Please explain why.	Yes	Please see attached.
TDC - Environment and Planning	34 Do you agree with the proposed residential and business growth sites in Tākaka?	Don't know	
TDC - Environment and Planning	35 Do you agree with the proposed residential and business growth sites in Murchison?	Don't know	
TDC - Environment and Planning	36 Do you agree with the proposed residential and business growth sites in Collingwood?	Don't know	
TDC - Environment and Planning	37 Do you agree with the proposed	Don't know	

	residential and business growth sites in Tapawera?		
TDC - Environment and Planning	38 Do you agree with the proposed residential and business growth sites in St Arnaud?	Don't know	
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		Please see attached for further detail - additional attachments included: Yes I am interested in why people come to live in Nelson - Tasman and who they are. Who are these people. Council needs to do some social science and find out so you can plan appropriately.

L - 31835 - 1 - Ian Wishart

SUBMISSION FORM

DRAFT NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022 – 2052

You can also fill out this survey online. Please see the link at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Name: Ian Wishart

Organisation represented (if applicable): _____

Address: _____

Email: _____ Phone number: _____

Do you wish to speak at a hearing? Yes No If yes, which date? 27 April 28 April 3 May

Hearings are scheduled for 27 April, 28 April and 3 May and are likely to be online rather than in person due to the current Red setting in the Covid Protection Framework and in order to keep everyone safe. If you do not tick one date, we will assume you do not wish to be heard. If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please indicate here: Te Reo Māori New Zealand sign language

Public information: All submissions (including the names and contact details of submitters) are public information and will be available to the public and media in various reports and formats including on the Councils' websites. Personal information will also be used for administration relating to the subject matter of submissions. Submitters have the right to access and correct any personal information included in any reports, information or submissions. The Councils will not accept anonymous submissions or any submissions containing offensive content.

1. Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in greenhouse gas emissions by integrating land use transport. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

2. Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

All depends on appropriate design a architecture, need novel & imaginative ideas put before the public

3. Please indicate whether you support or do not support Outcome 3: New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know



4. Please indicate whether you support or do not support Outcome 4: A range of housing choices are provided that meet different needs of the community, including papakāinga and affordable options. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Facilitate people into tiny homes, unusual style homes, communal homes. Please do not encourage the continuation of building the large mansions by the large building companies

5. Please indicate whether you support or do not support Outcome 5: Sufficient residential and business land capacity is provided to meet demand. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Only in line with your work in Section 14.2

6. Please indicate whether you support or do not support Outcome 6: New infrastructure is planned, funded and delivered to integrate with growth and existing infrastructure is used efficiently to support growth. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

7. Please indicate whether you support or do not support Outcome 7: Impacts on the natural environment are minimised and opportunities for restoration are realised. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

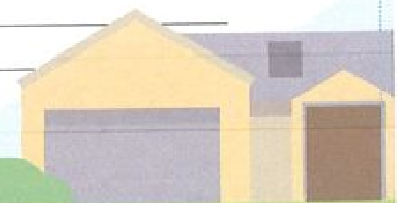
8. Please indicate whether you support or do not support Outcome 8: Nelson Tasman is resilient to and can adapt to the likely future effects of climate change. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

9. Please indicate whether you support or do not support Outcome 9: Nelson Tasman is resilient to the risk of natural hazards. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

8



10. Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

11. Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

12. Regarding the FDS outcomes, do you have any other comments or think we have missed anything?

YES Intensification cannot begets the idea of HOW a WHAT - Few people want to live in hen-houses or farmements.
Please see final comments at end of submission

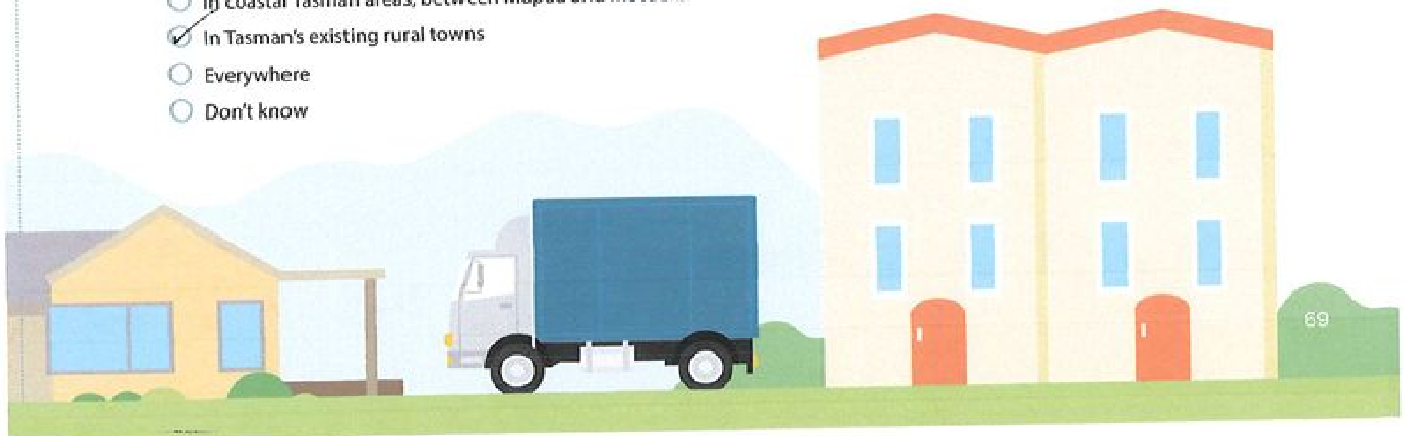
13. Do you support the proposal for consolidated growth along State Highway 6 between Alawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

I oppose All greenfield expansion
I request TDC to reduce ~~the~~ minimum allotment sizes on Rural 1, 2, 3 + Rural Residential

14. Where would you like to see growth happening over the next 30 years? Tick as many as you like.

- Largely along the SH6 corridor as proposed
 Intensification within existing town centres as long as done well
 Expansion into greenfield areas close to the existing urban areas
 Creating new towns away from existing centres (if so, tell us where): NO NEW TOWNS
 In coastal Tasman areas, between Māpua and Motueka
 In Tasman's existing rural towns
 Everywhere
 Don't know



15. Do you agree with prioritising intensification within Nelson? This level of intensification is likely to happen very slowly over time. Do you have any comments?

- Strongly agree
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 Neutral
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Nelson is not Paris or Berlin and inner city living has minimal appeal for most, but does appeal to some, needs to be one of many options, ✓

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Please No 6 Story buildings in the area around Andrew St a mid-Longer St

17. Do you agree with the level of intensification proposed in Richmond, right around the town centre and along McGlashen Avenue and Salisbury Road? Any comments?

- Strongly agree
 Agree
 Neutral
 Disagree
 Strongly disagree
 Don't know

As long as done well. Please, no future streets

18. Do you agree with the level of intensification proposed around the centre of Brightwater? Any comments?

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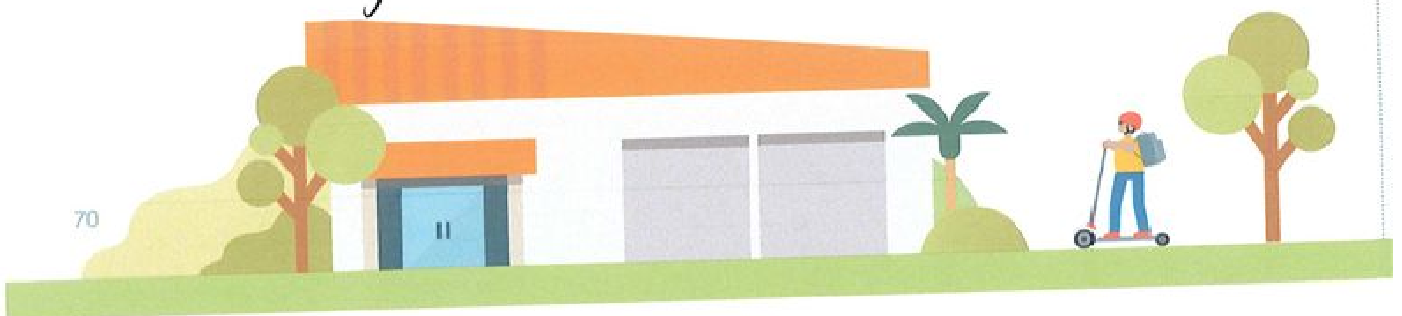
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20. Do you agree with the level of intensification proposed in Motueka (greenfield intensification and brownfield intensification)? Any comments?

- Strongly agree
 Agree
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 Disagree
 Strongly disagree
 Don't know

Motueka too close to sea level to allow much growth at all.



21. Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?

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It is inevitable Māpua is a future hot spot & I
care little for it so do whatever you like to
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22. Do you agree with the location and scale of the proposed greenfield housing areas in Nelson?
Please explain why.

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NCC has little option but to build on terraces
below Barnicoat range & Atawhai. Please No more
Bespoke massed
houses.

23. Do you agree with the location and scale of the proposed greenfield housing areas in Stoke?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

Get creative
guys.

24. Do you agree with the location and scale of the proposed greenfield housing areas in Richmond?
Please explain why.

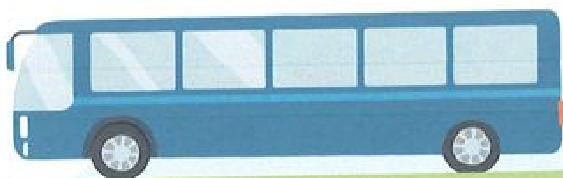
- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

25. Do you agree with the location and scale of the proposed greenfield housing areas in Brightwater?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

26. Do you agree with the location and scale of the proposed greenfield housing areas in Wakefield?
Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know



27. Do you agree with the location and scale of the proposed greenfield housing areas in Motueka?
Please explain why.

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

28. Do you agree with the location and scale of the proposed greenfield housing areas in Māpua?
Please explain why.

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

Don't Care about Māpua.

29. Do you think we have got the balance right in our core proposal between intensification and greenfield development (approximately half intensification, half greenfield for the combined Nelson Tasman region)?

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

30. If you don't think we have got the balance right, let us know what you would propose. Tick all that apply.

- More intensification
- Less intensification
- More greenfield expansion
- Less greenfield expansion

31. Do you support the secondary part of the proposal for a potential new community near Tasman Village and lower Moutere (Braeburn Road)? Please explain why.

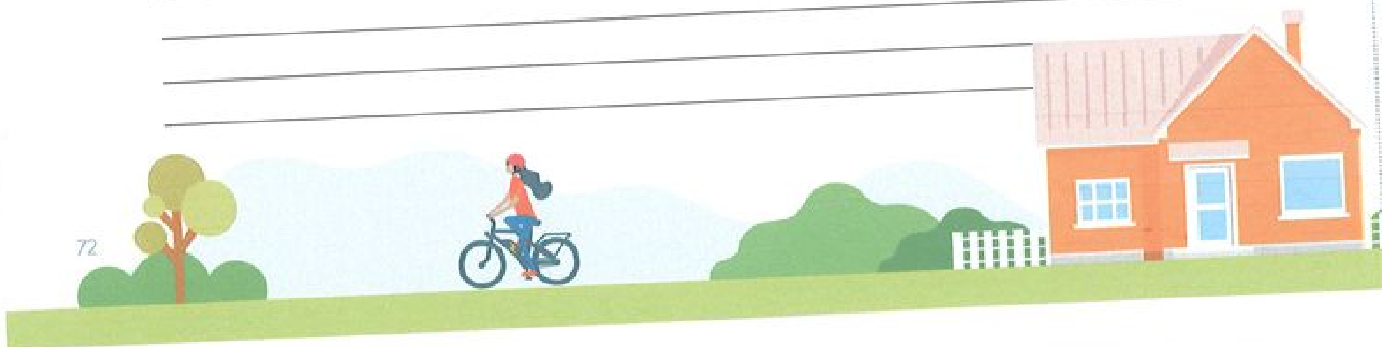
- Yes
- No
- Don't know
- Yes provided agreement can be reached with Te Ātiawa

Only Lower Moutere,

32. Do you agree with the locations shown for business growth (both commercial and light industrial)?
Please explain why.

- Strongly agree
- Agree
- Neutral
- Disagree
- Strongly disagree
- Don't know

33. Let us know if there are any additional areas that should be included for business growth or if there are any proposed areas that you consider are more or less suitable.



34. Do you agree with the proposed residential and business growth sites in Tākaka?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

35. Do you agree with the proposed residential and business growth sites in Murchison?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

36. Do you agree with the proposed residential and business growth sites in Collingwood?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

37. Do you agree with the proposed residential and business growth sites in Tapawera?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

38. Do you agree with the proposed residential and business growth sites in St Arnaud?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

39. Let us know which sites you think are more appropriate for growth or not in each rural town. Any other comments on the growth needs for these towns?

40. Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?

YES I am interested in **Why** people come to live in Nelson-Tasman and who they are. WHO ARE THESE PEOPLE. Councils need to do some social science and find out so you can plan appropriately. PS. I am a retired social scientist.

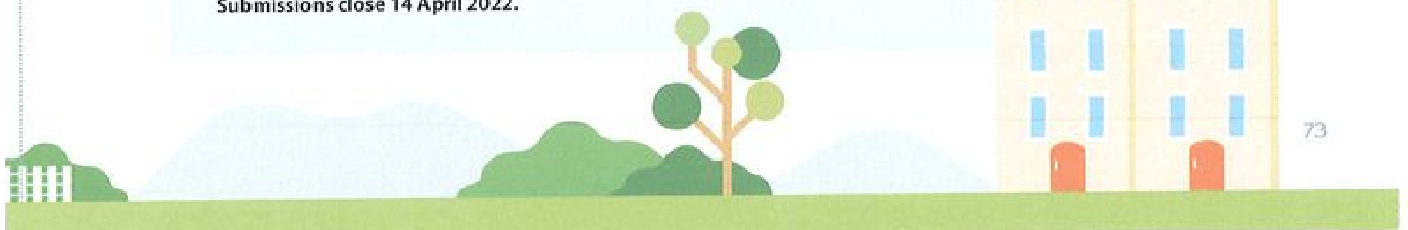
It's important to have your say on the big choices.

Once you've filled out this submission form:

- Email it to futuredevelopmentstrategy@ncc.govt.nz or futuredevelopmentstrategy@tasman.govt.nz.
- Post it to Tasman District Council, 189 Queen Street, Private Bag 4, Richmond 7050 or Nelson City Council, PO Box 645, Nelson 7040.
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Alternatively, you can fill out the survey online. A link is provided at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Submissions close 14 April 2022.



Final Comment

My motivation for writing this submission is my concern with two issues:

- ① The large ^{minimum} allotment sizes in Tasman district as eg around Hanley Rd & Appleby Heights. Inevitably this will lead to windfall profits from future subdivisions from future Plan Changes.
- ② Application of the Resource Management (Enabling Housing Supply & other Matters) Act 2021
 - (i) This is very poorly written & hard to understand
 - (ii) 3 Houses per section, 3 storeys, : This will end in Pain (& profits for lawyers) over inevitable disputes, aggression, & mental health issues

NOTE See accompanying photo of a house in my street where the view is blocked by a house erected in front of it

Example of bad design likely to lead to disputes & challenges & legal issues.

Would any of the Councillors like to have this erected in front of their house?



House, approved by TDS, currently being built in Salisbury Rd
Infringes on Privacy of neighbours. This is unacceptable

Submission Summary

Nelson Tasman Future Development Strategy - Submission #31836

Paula M Wilks

Speaker? False

Department	Subject	Opinion	Summary
TDC - Environment and Planning	01 Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in GHG emissions by integrating land use transport. Please explain your choice:	Strongly agree	We must address climate change by reducing greenhouse gas emissions wherever we can.
TDC - Environment and Planning	02 Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements.	Agree	Emphasis on intensification. Don't want Richmond sprawling onto the Waimea Plains. Must consider carefully what smaller settlement networks are developed. Minimize commuting and traffic congestion.

	Please explain your choice:		
TDC - Environment and Planning	01 Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in GHG emissions by integrating land use transport. Please explain your choice:	Strongly agree	Esp jobs, services amenities with public & active transport. Desire to live in location not of strong value. The above in place make it a desirable place to live.
TDC - Environment and Planning	10 Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice:	Strongly agree	We must produce food to feed the nation ourselves, reduce dairy, increase vegetable production.
TDC - Environment and Planning	11 Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice:	Strongly Disagree	This embraces caring & supporting our environment only some change revives and enhances this must not do change with NEG environmental outcomes.
TDC - Environment and Planning	12 Regarding the FDS outcomes, do you have any other comments or think we have missed anything?		I think over all great but with development of Tasman we will end up merging Mapua & Tasman and lose a beautiful rural/coastal area and perception of beautiful Nelson. Which is what brings people to our area. Keep Tasman Village and hinterland as rural as possible.
TDC - Environment and Planning	13 Do you support the proposal for consolidated growth along SH6 between Atawhai and Wakefield but also including	Strongly disagree	50/50 yes agree Atawhai to Wakefield development, Mapua development. No not Motueka & Tasman (village).

	Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?		
TDC - Environment and Planning	14 Where would you like to see growth happening over the next 30 years? Please list as many of the following options that you agree with: (a) Largely along the SH6 corridor as proposed (b) Intensification within existing town centres (c) Expansion into greenfield areas close to the existing urban areas (d) Creating new towns away from existing centre (please tell us where) (e) In coastal Tasman areas, between Mapua and Motueka (f) In Tasman's existing rural towns (g) Everywhere (h) Don't know		Largely along the SH6 corridor as proposed. Intensification within existing town centres. In Tasman's existing rural towns. Tapawera. Has work, good travel route and schools and shops.
TDC - Environment and Planning	21 Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?	Strongly agree	Go up not out. But parks & recreation areas significantly increased.
TDC -	22 Do you agree	Strongly	As above.

Environment and Planning	with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.	agree	
TDC - Environment and Planning	22 Do you agree with the location and scale of the proposed greenfield housing areas in Nelson? Please explain why.	Strongly agree	As above.
TDC - Environment and Planning	23 Do you agree with the location and scale of proposed greenfield housing areas in Stoke? Please explain why.	Strongly agree	As above.
TDC - Environment and Planning	24 Do you agree with the location and scale of proposed greenfield housing areas in Richmond? Please explain why.	Strongly agree	As above. Do not sprawl onto Waimea Plains.
TDC - Environment and Planning	25 Do you agree with the location and scale of proposed greenfield housing areas in Brightwater? Please explain why.	Strongly agree	As per Q21.
TDC - Environment and Planning	26 Do you agree with the location and scale of proposed greenfield housing areas in Wakefield? Please explain why.	Strongly agree	As per Q21.
TDC - Environment and Planning	34 Do you agree with the proposed residential and business growth sites in Tākaka?	Agree	
TDC -	35 Do you agree	Strongly	

Environment and Planning	with the proposed residential and business growth sites in Murchison?	agree	
TDC - Environment and Planning	36 Do you agree with the proposed residential and business growth sites in Collingwood?	Agree	
TDC - Environment and Planning	37 Do you agree with the proposed residential and business growth sites in Tapawera?	Agree	
TDC - Environment and Planning	38 Do you agree with the proposed residential and business growth sites in St Arnaud?	Agree	
TDC - Environment and Planning	40 Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?		The Richmond - Mapua - Tasman - Motueka coast route is one of the most scenic in Nelson. It's what visitors want to see so DO NOT create Tasman Village. On this route put more cycle areas, picnic spots, beach access, cafes, NOT residential houses. People don't drive or travel to see residential houses. They want scenery.

Paula Wilks - Sub # 31836 - 1

SUBMISSION FORM

DRAFT NELSON TASMAN FUTURE DEVELOPMENT STRATEGY 2022 – 2052

You can also fill out this survey online. Please see the link at shape.nelson.govt.nz/future-development-strategy and tasman.govt.nz/future-development-strategy.

Name: Paula m wilks

Organisation represented (if applicable): _____

Address: _____

Email: _____

Do you wish to speak at a hearing? Yes No If yes, which date? 27 April 28 April 3 May

Hearings are scheduled for 27 April, 28 April and 3 May and are likely to be online rather than in person due to the current Red setting in the Covid Protection Framework and in order to keep everyone safe. If you do not tick one date, we will assume you do not wish to be heard. If you wish to present your submission at the hearing in Te Reo Māori or New Zealand sign language please indicate here: Te Reo Māori New Zealand sign language

Public information: All submissions (including the names and contact details of submitters) are public information and will be available to the public and media in various reports and formats including on the Councils' websites. Personal information will also be used for administration relating to the subject matter of submissions. Submitters have the right to access and correct any personal information included in any reports, information or submissions. The Councils will not accept anonymous submissions or any submissions containing offensive content.

1. Please indicate whether you support or do not support Outcome 1: Urban form supports reductions in greenhouse gas emissions by integrating land use transport. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

We must address climate change by reducing greenhouse gas emissions wherever we can,

2. Please indicate whether you support or do not support Outcome 2: Existing main centres including Nelson City Centre and Richmond Town Centre are consolidated and intensified, and these main centres are supported by a network of smaller settlements. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

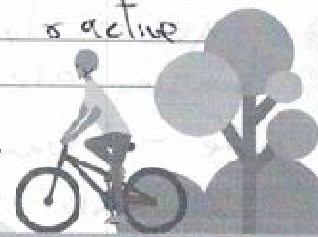
Emphasis on intensification. Don't want Richmond sprawling onto the Waimea plains. Must consider carefully what smaller settlements networks are developed. Minimise commuting and traffic congestion.

3. Please indicate whether you support or do not support Outcome 3: New housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Please explain your choice.

Strongly agree Agree Neutral Disagree Strongly disagree Don't know

* Esp Jobs, services amenities with public & active transport.

Desire to live in location w/ of strong value. The above* in place make it a desirable place to live.



10. Please indicate whether you support or do not support Outcome 10: Nelson Tasman's highly productive land is prioritised for primary production. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

We must produce food to feed the nation ourselves, reduce dairy, increase vegetable production

11. Please indicate whether you support or do not support Outcome 11: All change helps to revive and enhance the mauri of Te Taiao. Please explain your choice.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

This embraces caring & supporting our environment only some change revives + enhances this must not do change with NEG environmental outcomes

12. Regarding the FDS outcomes, do you have any other comments or think we have missed anything?

I think over all great but with development of Tasman we will end up merging Māpua + Tasman and loose a beautiful rural/coastal area and beauty perception of beautiful Nelson. Which is what brings people to our area. Keep Tasma village and hinterland as rural as possible.

13. Do you support the proposal for consolidated growth along State Highway 6 between Atawhai and Wakefield but also including Māpua and Motueka and meeting needs of Tasman rural towns? This is a mix of intensification, greenfield expansion and rural residential housing. Please explain why?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

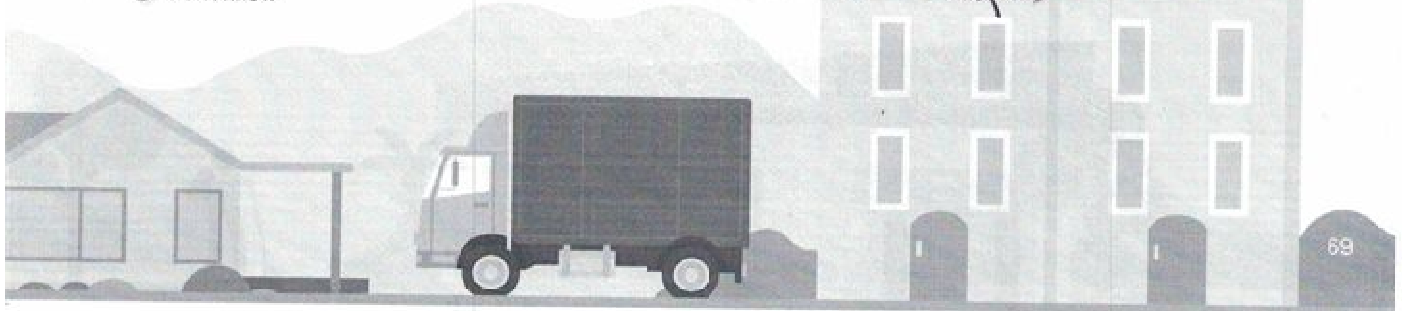
50/50 yes agree atawhai to wakefield development Māpua development.

NO Not Motueka + Tasman (village)

14. Where would you like to see growth happening over the next 30 years? Tick as many as you like.

- Largely along the SH6 corridor as proposed
 Intensification within existing town centres
 Expansion into greenfield areas close to the existing urban areas
 Creating new towns away from existing centres (if so, tell us where):
 In coastal Tasman areas, between Māpua and Motueka
 In Tasman's existing rural towns
 Everywhere
 Don't know

Tapanera, Has work good travel route and schools & shops.



21. Do you agree with the level of intensification proposed in Māpua (intensifying rural residential area to residential density)? Any comments?

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

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- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

as above

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as above

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as above, Do not sprawl on to Waimānā plains

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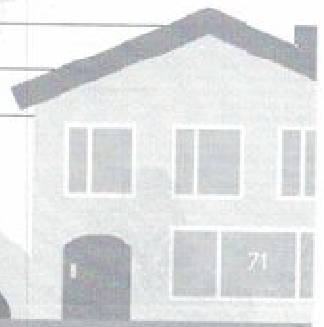
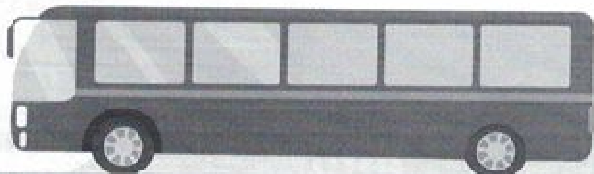
- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

as per Q 21

25. Do you agree with the location and scale of the proposed greenfield housing areas in Wakefield? Please explain why.

- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

as per question 21



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- Strongly agree Agree Neutral Disagree Strongly disagree Don't know

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39. Let us know which sites you think are more appropriate for growth or not in each rural town. Any other comments on the growth needs for these towns?

40. Is there anything else you think is important to include to guide growth in Nelson and Tasman over the next 30 years? Is there anything you think we have missed? Do you have any other feedback?

(murmur)

The Richmond — mapua — Tasman — Motueka coast route is one of the most scenic in Nelson. It's what visitors want to see. So Do Not create Tasman village. On this route put more cycle area, picnic spots, beach access, cafes, Not residential houses.

People Don't drive, or travel to see residential houses they want scenery. It's important to have your say on the big choices.

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