

COVER SHEET



Return your submission by the advertised closing date to: Environmental Policy Tasman District Council Private Bag 4, Richmond 7050 OR 189 Queen Street, Richmond OR Fax 03 543 9524 OR Email: tasmanrmp@tasman.govt.nz

Further Submission on any Original Submission on a Change to the Tasman Resource Management Plan

OFFICE USE

Date received stamp:

Rec'd 27/5/16

Initials: [Signature] Submitter No. 174

Note:

- 1. This form is only for the purpose of supporting or opposing original submissions. It is NOT for making an original submission to the Plan, or for making a submission on a resource consent or on Council's Annual Plan.
2. You may only make a further submission if you or your organisation complies with the requirements below.
Tick to show that you or your organisation is:
- [X] A person representing a relevant aspect of the public interest.
- [] A person who has an interest in the proposed Plan Change greater than the general public.

Submitter Name: Transpower New Zealand Limited (organisation/individual)

Representative/Contact: Rhedyn Law, Resource Management Group (if different from above)

Postal Address: PO Box 1021 Wellington 6140

Phone: 04 903 5344 Fax: Email: rhedyn@rmgroup.co.nz Date: 27/05/2016

Postal address for service of person making submission: (if different from above) PO Box 10170 The Terrace Wellington 6143

Total number of pages submitted (including this page):

Signed: [Signature] Signature of submitter (or person authorised to sign on behalf of submitter). NOTE: A signature is not required if you make your submission by electronic means.

IMPORTANT - Please state:

This submission relates to Change No.: 60

Change Title/Subject: Rural Land Use and Subdivision Policy Review

- Tick if you wish to be heard in support of your further submission.
- Tick if you would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearings.

Remember: 1. Attach this Cover Sheet to as many Content Sheets as required. 2. Within five working days of sending this further submission to the Tasman District Council, send a copy of this further submission to the person who made the original submission.

To: Tasman District Council

Further Submission by Transpower New Zealand Limited on
Proposed Plan Change 60: Rural Land Use and Subdivision
Policy Review to the Operative Tasman Resource
Management Plan

27 May 2016

Keeping the energy flowing



Address for Service:

Transpower NZ Ltd
C/- RMGPO Box 10-170
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Wellington 6143
ATTN: Rhedyn Law
Phone (04) 903 5344
Email: rhedyn@rmgroup.co.nz

Transpower New Zealand Limited The National Grid

**FURTHER SUBMISSION BY TRANSPOWER NEW ZEALAND LIMITED ON
PROPOSED PLAN CHANGE 60 TO
THE OPERATIVE TASMAN RESOURCE MANAGEMENT PLAN:
RURAL LAND USE AND SUBDIVISION POLICY REVIEW**

Clause 8 of First Schedule, Resource Management Act 1991

To: Manager, Policy
Tasman District Council
Private Bag 4,
Richmond 7050
Email: tasmanrmp@tasman.govt.nz

NAME OF SUBMITTER: Transpower New Zealand Limited
(Note address for service below)

1.0 INTRODUCTION

1.0 Transpower New Zealand Limited (Transpower) lodged a submission on proposed Plan Change 60 (PC60) to the Operative Tasman Resource Management Plan (identified as Submission 174 in the Council's summary of submissions).

1.1 Attached as **Appendix 1** is a Table outlining Transpower's further submissions on submissions received in relation to PC60. Each further submission identifies the relevant original submission and the reasons for Transpower's further submissions.

2.0 TRANSPOWER WISHES TO BE HEARD IN SUPPORT OF THIS SUBMISSION.

3.0 TRANSPOWER COULD NOT GAIN AN ADVANTAGE IN TRADE COMPETITION THROUGH THIS SUBMISSION.

4.0 TRANSPOWER HAS AN INTEREST IN THE PROPOSED PLAN CHANGE GREATER THAN THE INTEREST THAT THE GENERAL PUBLIC HAS.

5.0 ALL FURTHER SUBMISSIONS MADE BY TRANSPOWER ARE LIMITED TO MATTERS OF SUPPORT OR OPPOSITION TO RELEVANT SUBMISSIONS MADE ON THE PROPOSED PLAN CHANGE.

Address for service:

Transpower New Zealand Ltd
C/- RMG
PO Box 10170
The Terrace
WELLINGTON 6143
ATTN: Rhedyn Law

Approved for release by:

Rebecca Eng
Senior Environmental Planner
Environmental Policy and Planning Team
Transpower New Zealand Limited:

Appendix 1: Table of Further Submissions

Submission Point	Submitter	Specific part of the original submission to which FS relates	Support/oppose specific part of the submission	Reasons For Further Submission	Decision sought
C60.830.1	830, Fulton Hogan Ltd	Amend proposed definition of "reverse sensitivity" to: "Reverse sensitivity – means the risk to, and adverse effects on, an existing activity that may generate actual or perceived adverse effects as a result of receiving complaints or other expressions of sensitivity from any new activity locating nearby.	Support in part	<p>Among other matters, Transpower's original submission relates to potential reverse sensitivity effects on the National Grid. As such, this term is used throughout Transpower's submission, and is used in objectives, policies and rules that Transpower has sought to be introduced.</p> <p>Transpower considers that the wording of the proposed definition included through PC60 could be improved, as has been identified through the Fulton Hogan submission. Transpower supports the intent of Fulton Hogan's submission to make the definition clearer. Additional refinements may also be appropriate for the purposes of making the definition simpler.</p>	Accept in part FC60.174.1
C60.806.1	806, NZ Transport Agency	2. Delete and insert words to the third bullet point under the paragraph beginning, "This chapter addresses the management of the District rural land resource in terms of three main areas of policy, ... to read as follows: "Managing the effects of activities in rural areas, including cross-boundary and reverse sensitivity effects, effects on rural character and amenity values, and effects on transport routes including State Highways."	Support in part	<p>Transpower supports the amendment sought by this submitter, as it seeks to manage effects on regionally significant infrastructure. These amendments can be accommodated in tandem with those sought by Transpower to manage effects on the National Grid, which is also nationally significant and subject to potential reverse sensitivity effects.</p> <p>Transpower considers that this bullet point requires amendment to refer to effects on the National Grid, as set out in Transpower's original submission.</p>	Accept in part FC60.174.2

Rec'd 30/5/16

30 May 2016

Steve Markham
Manager, Policy
Tasman District Council
Private Bag 4
Richmond 7050

Dear Steve

Tasman District Council Plan Change 60: NZ Transport Agency Further Submission

Thank you for the opportunity to submit on the primary submissions for proposed Plan Change 60: Rural Land Use and Subdivision Policy Review. Please find attached the NZ Transport Agency's further submission.

We welcome the opportunity to discuss the contents with Council officers. If you have any further questions, please do not hesitate to contact myself on (04) 931-8871 or kathryn.barrett@nzta.govt.nz.

Yours sincerely



Kathryn Barrett
Senior Planning Advisor

FORM 6, Clause 8 of First Schedule, Resource Management Act 1991

Further Submission on Proposed Plan Change 60 to Tasman District Council District Plan – Rural Land Use and Subdivision Policy Review

To: Steve Markham
Manager, Policy
Tasman District Council
Private Bag 4
Richmond 7050

Via email: steve.markham@tasman.govt.nz

From: New Zealand Transport Agency
PO Box 5084
WELLINGTON 6145

The NZ Transport Agency (Transport Agency) is making this further submission in accordance with Clause 8 of Schedule 1 of the Resource Management Act 1991.

The Transport Agency has an interest in Proposed Plan Change 60 (PC60) that is greater than the interest the general public has for reasons including the following:

- The Transport Agency manages and funds the State highways within the District, which have the potential to be affected by relief sought in the relevant submissions.
- The Transport Agency made an original submission on matters raised or affected by those submissions.

The Transport Agency's position in relation to specific submissions is identified within the table included in Schedule 1 (attached).

As set out in its primary submission on PC60, the Transport Agency is generally supportive of development where it encourages economic growth and productivity. However, we seek to ensure that the transport needs of growth are considered as part of any development proposal, along with any potential effects on the safety and efficiency of the State highway network.

To summarise, the Transport Agency is aiming to ensure that the Plan Change appropriately manages specific transport related effects, including:

1. Adverse effects of “ribbon development” (or “urban creep”), being development that contributes to cumulative transport effects within a local area, along State highways
2. Effects on safe access between private property and the State highway
3. Cumulative effects of development on local side roads impacting on the safety and efficiency of State highway intersections
4. Reverse sensitivity effects
5. Effects from temporary activities

Therefore, the Transport Agency’s submission and further submission seeks:

- A policy framework that recognises the State highway network as being impacted by such development (and involves the Transport Agency early in the process for any rezoning or development proposals).
- Matters of control and discretion which enable effects on the State highway network to be specifically considered through resource consent processes (and either appropriate conditions imposed, or, conceivably, consent declined where the adverse effects cannot be suitably managed).

In developing the package of relief sought in this further submission (and also its primary submission), the Transport Agency is mindful that the zoning of rural land within Tasman District is likely to be subject to change through a separate plan change process that has not yet been notified. In light of this, the Transport Agency has found it necessary to adopt a slightly more comprehensive approach than might otherwise have been necessary. This is because there is no certainty as to what zonings will apply in a given location, or conversely, where future development will be concentrated. It would have been preferable from the Transport Agency’s perspective if the location and extent of the various zones and the associated plan provisions (objectives, policies, rules and other methods) were able to be considered through the same planning process.


If the Council considers that additional controls or assessment criteria that relate to the State highway network are unnecessary in some locations then the Transport Agency would accept relief that focussed on particular geographic areas of concern, rather than applying the provisions sought by the Transport Agency on a zone-wide basis. This could be seen as a more efficient means of

safeguarding the State highway network (and would ensure that any constraint on development would be no more than necessary).

Further to the above, the Transport Agency would like to work with the Council and the community to explore alternative options, such as overlays and related assessment criteria. These would provide a targeted approach to urban creep, ribbon development and cumulative effects on side roads to provide greater certainty about the areas where the Transport Agency is concerned about transport effects on the State highway network. This would limit the geographic extent of the assessment criteria to specific locations where the overlay is shown rather than the entirety of the rural zones. The Transport Agency considers that the extent of this overlay would need to be confirmed through the future zoning plan change (not yet notified), and the Transport Agency intends to submit on that plan change (when it is notified) in support of such an overlay. However, it would appear to be appropriate for the overlay provisions themselves (objectives, policies and rules) to be determined through PC60, and so these have been sought through the Transport Agency's further submissions (as alternative relief).

The Transport Agency seeks the relief laid out in Schedule 1, and any consequential, alternative, or further relief required to address the concerns as set out in our primary submission or this further submission. If resolution is reached with other parties, we seek the relief necessary to support that resolution.

The Transport Agency wishes to be heard in support of its further submission. Due to the specific interests of the Transport Agency it will not consider presenting a joint case with others at the hearing.



.....
Kathryn Barrett - Senior Planning Advisor on behalf of the NZ Transport Agency

Date: 30 May 2016

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
<p>#806 NZ Transport Agency Caroline Horrox Caroline.horrox@nzta.govt.nz</p>	<p>C60.806.2 7.1.1.1 – Cumulative Adverse Effects of Non Soil-Based Production Retain proposed issue 7.1.1.1 (a) and (b).</p>	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability of a development proposal. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36. The Transport Agency would consider appropriate alternative methods.</p>	<p>Support . 1</p>
<p>C60.806.3 7.1.1.1 – Cumulative Adverse Effects of Non Soil-Based Production Amend issue (c) to include the words “transport routes” after “service provision”.</p>	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability of a development proposal. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36. The Transport Agency would consider appropriate alternative methods.</p>	<p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36. The Transport Agency would consider appropriate alternative methods.</p>	<p>Support . 2</p>
<p>C60.806.20 7.2.3.1C – Enabling Further Development within Existing Rural Residential Zone Amend proposed policy 7.2.3.1C(c) to: “can be adequately serviced for water, wastewater, stormwater, and road access including the State Highway network and its intersections with local roads.</p>	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability of a development proposal. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, is to be considered when determining the suitability of a development proposal. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, is to be considered when determining the suitability of a development proposal. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>Support . 3</p>

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
C60.806.21	<p>7.2.3.1C – Enabling Further Development within Existing Rural Residential Zone</p> <p>Insert a new clause in 7.2.3.1C: “(d) The development will not result in adverse effects on the State Highway network including its intersections with local side roads.”</p>	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability of a development proposal.</p> <p>To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, is to be considered when determining the suitability of a development proposal.</p> <p>To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	Support .4
C60.806.22-24	<p>Delete proposed policy 7.2.3.1D.</p> <p>Or if retained, amend.</p>	<p>The Transport Agency remains of the view that this policy should be deleted. However, if it is not, then the Transport Agency requests the alternative relief sought in the primary submission be adopted. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36.</p>	Support .5-7
C60.806.25	<p>7.2.3.1G – Enabling Further Development within Existing Rural Residential Zones</p> <p>Insert a new clause in 7.2.3.1G: “(f) The development will not result in adverse effects on the State Highway network including it</p>	<p>The Transport Agency wants to ensure that residential development occurs in suitable locations.</p>	<p>The Transport Agency would consider appropriate alternative methods.</p> <p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36.</p>	Support .8

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
	intersections with local side roads."			
C60.806.28	7.2.30 – Principal Reasons and Explanation	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability of a development proposal.</p> <p>To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>The Transport Agency would consider appropriate alternative methods.</p> <p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36.</p>	Support .9
C60.806.30	7.2.30 – Principal Reasons and Explanation	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability of a development proposal.</p> <p>To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.</p>	<p>The Transport Agency would consider appropriate alternative methods.</p> <p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36.</p>	Support .10
C60.806.32	7.3.3.11 – Improvement of Access and Roads in Coastal Tasman Area	<p>Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability</p>	<p>The Transport Agency would consider appropriate alternative methods.</p> <p>One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this</p>	Support

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
	Amend current policy 7.3.3.11 to read: "To improve access and progressively upgrade roads and intersections (including with the State Highway) throughout the Coastal Tasman Area ..."	of a development proposal. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.	would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36. The Transport Agency would consider appropriate alternative methods.	.11
C60.806.33 7.3.3 – Policies Insert a new policy in section 7.3.3 as follows: "To take into account, and avoid, remedy, or mitigate actual or potential traffic and access effects (including cumulative effects) of any development on the roading network, including the State Highway."	Additional strength and provision is required to reflect that access and traffic effects, including on the State highway, are to be considered when determining the suitability of a development proposal. To complement and strengthen this, the Transport Agency suggests that a Restricted Discretionary rule be adopted to implement the policy provisions.	The Transport Agency would consider appropriate alternative methods. One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36. The Transport Agency would consider appropriate alternative methods.	Support .12	
C60.806.36 16.3.5.1 – Controlled Subdivision (Rural 1 and Rural 1 Coastal Zones) Amend proposed rule 16.3.5.1 by inserting a new matter of control after matter (4) as follows: "Potential effects on the State Highway network, including where local roads intersect with it."	The Transport Agency is concerned that the issues of urban creep/ribbon development and cumulative effects are not adequately addressed in the Plan Change. The Transport Agency's primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order to safeguard the State highway network. The overall intent of that relief is supported, and the Transport Agency proposes that as	The Transport Agency requests a rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. The Rule would implement the intent of the requested policy changes in our primary submission. The Rule would make the following activities a Restricted Discretionary activity when adjacent to the State highway (i.e. where development is either fronting onto	Support .13	

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
		<p>alternative relief an overlay approach could also be considered.</p>	<p>the State highway or on local side roads where traffic will be generated on the State highway):</p> <ul style="list-style-type: none"> a) Second dwelling b) Minor dwelling c) Commercial activities d) Subdivision e) Co-operative living. <p>One method could be to create an overlay showing where the Transport Agency is concerned about urban creep/ribbon development. The overlay could be linked to the above rule and a specific assessment criterion introduced relating to cumulative transport impacts.</p> <p>The overlay would enable geographic targeting of management of urban creep/ribbon development transport effects.</p> <p>The Transport Agency would consider appropriate alternative methods.</p>	<p>Support</p>
<p>C60.806.37 16.3.5.5A – Non-Complying Subdivision (Rural 1 Zone) Retain proposed rule 16.3.5.5A.</p>		<p>The Transport Agency is concerned that the issues of urban creep/ribbon development are not adequately addressed in the Plan Change. The Transport Agency's primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order to safeguard the State highway network.</p> <p>The overall intent of that relief is supported, and the Transport Agency proposes that as alternative relief an overlay approach could</p>	<p>As per the further submission relief sought for the summary point C60.806.36.</p>	<p>Support</p> <p>.14</p>

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
	<p>C60.806.38</p> <p>16.3.6.1 – Controlled Subdivision (Rural 2 Zone)</p> <p>Amend proposed rule 16.3.6.1 by inserting a new matter of control after matter (4) as follows: “Potential effects on the State Highway network including where local roads intersect with it.”</p>	<p>also be considered.</p> <p>The Transport Agency is concerned that the issues of urban creep/ribbon development are not adequately addressed in the Plan Change. The Transport Agency’s primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order to safeguard the State highway network.</p> <p>The overall intent of that relief is supported, and the Transport Agency proposes that as alternative relief an overlay approach could also be considered.</p>	<p>As per the further submission relief sought for the summary point C60.806.36.</p>	<p>Support</p> <p>.15</p>
	<p>C60.806.39</p> <p>16.3.8.1 – Controlled Subdivision (Rural Residential Zone)</p> <p>Amend proposed rule 16.3.8.1 by inserting a new matter of control after matter (3) as follows: “Potential effects on the State Highway network including where local roads intersect with it.”</p>	<p>The Transport Agency is concerned that the issues of urban creep/ribbon development are not adequately addressed in the Plan Change. The Transport Agency’s primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order to safeguard the State highway network.</p> <p>The overall intent of that relief is supported, and the Transport Agency proposes that as alternative relief an overlay approach could also be considered.</p>	<p>As per the further submission relief sought for the summary point C60.806.36.</p>	<p>Support</p> <p>.16</p>
	<p>C60.806.40</p> <p>Sch. 16.3A – Assessment Criteria for Subdivision</p> <p>Amend current Assessment Criteria in Schedule 16.3A by inserting a</p>	<p>The Transport Agency is concerned that the issues of urban creep/ribbon development are not adequately addressed in the Plan Change. The Transport Agency’s primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order</p>	<p>As per the further submission relief sought for the summary point C60.806.36.</p>	<p>Support</p> <p>.17</p>

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
	<p>new assessment criterion after matter (36) as follows: "Potential effects from increased traffic generation on the State Highway network, including where local roads intersect with it."</p>	<p>to safeguard the State highway network.</p> <p>The overall intent of that relief is supported, and the Transport Agency proposes that as alternative relief an overlay approach could also be considered.</p>		
C60.806.43	<p>17.5.2.8A – Restricted Discretionary Activities (Cooperative Living)</p> <p>Amend proposed rule 17.5.2.8A by inserting a new matter of restricted discretion after matter (9) as follows: "Potential effects on the State Highway network including where local roads intersect with it."</p>	<p>The Transport Agency is concerned that the issues of urban creep/ribbon development are not adequately addressed in the Plan Change. The Transport Agency's primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order to safeguard the State highway network.</p> <p>The overall intent of that relief is supported, and the Transport Agency proposes that as alternative relief an overlay approach could also be considered.</p>	<p>As per the further submission relief sought for the summary point C60.806.36.</p> <p>.18</p>	<p>Support</p>
C60.806.46	<p>17.6.2.8A – Restricted Discretionary Activities (Co-operative Living)</p> <p>Amend proposed rule 17.6.2.8A by inserting a new matter of restricted discretion after matter (9) as follows: "Potential effects on the State Highway network including where local roads intersect with it."</p>	<p>The Transport Agency is concerned that the issues of urban creep/ribbon development are not adequately addressed in the Plan Change. The Transport Agency's primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order to safeguard the State highway network.</p> <p>The overall intent of that relief is supported, and the Transport Agency proposes that as alternative relief an overlay approach could also be considered.</p>	<p>As per the further submission relief sought for the summary point C60.806.36.</p> <p>.19</p>	<p>Support</p>
C60.806.49	<p>17.8.3.1A – Controlled Activities</p>	<p>The Transport Agency is concerned that the issue of urban creep/ribbon development are not adequately addressed in the Plan Change.</p>	<p>As per the further submission relief sought for the summary point C60.806.36.</p>	<p>Support</p>

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
#830 Fulton Hogan Limited C/- Landmark Lile Ltd PO Box 343 Nelson	(Building Construction or Alteration) Amend proposed rule 17.8.3.1A by inserting a new matter of control after matter (1) as follows: "Potential effects on the State Highway network including where local roads intersect with it."	The Transport Agency's primary submission sought that additional policies and matters of control/discretion be added throughout the rural zone chapters, in order to safeguard the State highway network. The overall intent of that relief is supported, and the Transport Agency proposes that as alternative relief an overlay approach could also be considered.		.20
	C60.830.1 Amend proposed definition of reverse sensitivity.	The Transport Agency is particularly conscious of reverse sensitivity, particularly regarding the vulnerability of an established activity to complaint from a new land use, e.g. effects of new residential development locating close to the State highway and then complaining about noise. Having a robust definition in place will help identify the issue more clearly.	The Transport Agency supports the intention of Fulton Hogan's definition, though it doesn't go far enough. The Transport Agency suggests the leading court derived definition of: "the effects of the existence of sensitive activities on other existing activities in the vicinity, particularly by leading to restraints on the carrying on of those other existing activities." This comes from <i>Auckland RC v Auckland CC</i> [1997] NZRMA 205 (EC).	Support in part .21
	C60.830.2 Amend Temporary Activity The primary submission also provides for an alternate option – to "these activities should be explicitly excluded from the controls that apply to temporary activities."	The Transport Agency made a primary submission on this provision. The submission by Fulton Hogan is consistent with the submission of the Transport Agency. The Transport Agency supports the amendment sought – to ensure that temporary contracting activities (such as outline in C60.830.2) are not limited to five days.	Retain Fulton Hogan's relief.	Support in part .22
	C60.830.5 Delete proposed unpermitted activity 17.5.2.1(a)(xiv)	The Transport Agency made a primary submission in general support, subject to seeking a minor amendment – increasing the vehicles from one to three. This is because the proposed restriction on the number of heavy vehicles used for commercial,	Relief outlined in the Transport Agency's primary submission (and as outlined below). <u>The maintenance, repair, storing, or parking of more than one three heavy vehicles (excluding agricultural machinery) with a</u>	Oppose

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
		<p>industrial or rural industrial activities on any one site appears unnecessarily restrictive. This could result in an increase in vehicle movements to and from sites, and parking of vehicles 'offsite' on road reserve or similar. A greater number of heavy vehicles could be allowed as permitted and the Transport Agency suggested three. The Transport Agency prefers its submission as it provides more certainty.</p>	<p><u>gross laden weight of 3,500 kilograms or more, that is being used for, or in connection with, any commercial, industrial or rural industrial activity.</u></p>	<p>. 23</p>
C60.830.6 Delete proposed unpermitted activity 17.6.2.1(a)(xii)		<p>The Transport Agency made a primary submission in general support, subject to seeking a minor amendment – increasing the vehicles from one to three. This is because the proposed restriction on the number of heavy vehicles used for commercial, industrial or rural industrial activities on any one site appears unnecessarily restrictive. This could result in an increase in vehicle movements to and from sites, and parking of vehicles 'offsite' on road reserve or similar. A greater number of heavy vehicles could be allowed as permitted and the Transport Agency suggested three. The Transport Agency prefers its submission as it provides more certainty.</p>	<p>Relief outlined in the Transport Agency's primary submission (and as outlined below).</p> <p><u>The maintenance, repair, storing, or parking of more than one three heavy vehicles (excluding agricultural machinery) with a gross laden weight of 3,500 kilograms or more, that is being used for, or in connection with, any commercial, industrial or rural industrial activity.</u></p>	<p>Oppose</p> <p>. 24</p>
C60.830.7 Delete proposed unpermitted activity 17.7.2.1(a)(xii)		<p>The Transport Agency made a primary submission in general support, subject to seeking a minor amendment – increasing the vehicles from one to three. This is because the proposed restriction on the number of heavy vehicles used for commercial, industrial or rural industrial activities on any one site appears unnecessarily restrictive. This could result in an increase in vehicle</p>	<p>Relief outlined in the Transport Agency's primary submission (and as outlined below).</p> <p><u>The maintenance, repair, storing, or parking of more than one three heavy vehicles (excluding agricultural machinery) with a gross laden weight of 3,500 kilograms or more, that is being used for, or in connection with, any commercial, industrial or rural</u></p>	<p>Oppose</p> <p>. 25</p>

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
		<p>movements to and from sites, and parking of vehicles 'offsite' on road reserve or similar. A greater number of heavy vehicles could be allowed as permitted and the Transport Agency suggested three. The Transport Agency prefers its submission as it provides more certainty.</p>	<p><i>industrial activity.</i></p>	
C60.830.8	Delete proposed unpermitted activity 17.8.2.1(a)(vi)	The Transport Agency made a primary submission in general support. The restriction to one heavy vehicle used for commercial, industrial or rural industrial activities on any one site is supported within the Rural Residential Zone due to the smaller site sizes and the outcomes sought for this zone.	Retain provisions and amendments as notified.	Oppose .26
C60.830.9	Amend proposed conditions 17.5.2.1 (p), (q), and (r) by clarifying the differences in applications of these conditions against the application of the current rule 16.8.2.1	The Transport Agency made a primary submission on this provision. The submission by Fulton Hogan is consistent with the primary submission of the Transport Agency. The Transport Agency supports the amendment sought – to ensure that temporary contracting activities (such as outlined in C60.830.2) are not limited to five days.	Amend, insofar as it aligns with the relief outlined in the Transport Agency's primary submission ¹ .	Support .27
C60.830.10	Amend proposed conditions 17.6.2.1 (p), (q), and (r) by clarifying the differences in applications of these conditions against the application of the current rule 16.8.2.1	The Transport Agency made a primary submission on this provision. The submission by Fulton Hogan is consistent with the submission of the Transport Agency. The Transport Agency supports the amendment sought – to ensure that temporary contracting activities (such as outlined in C60.830.2) are not limited to five days.	Amend, insofar as it aligns with the relief outlined in the Transport Agency's primary submission. ²	Support .28

¹ NZ Transport Agency, Primary Submission on Tasman Plan Change 60, page 11.

² Ibid

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
#1076 Ravensdown Fertiliser Co-Operative Ltd C- CHC Ltd PO Box 51-282 Tawa, Wellington	C60.1076.1 Retain Reverse Sensitivity definition	The Transport Agency is particularly conscious of reverse sensitivity, particularly regarding the vulnerability of an established activity to complaint from a new land use, i.e. effects of new residential development locating close to the State highway and then complaining about noise. Having a robust definition in place will help identify the issue more clearly.	The Transport Agency suggests the leading court derived definition of: "the effects of the existence of sensitive activities on other existing activities in the vicinity, particularly by leading to restraints on the carrying on of those other existing activities." This comes from <i>Auckland RC v Auckland CC</i> [1997] NZRMA 205 (EC).	Support in part .29
	C60.1076.2 17.6.2.1 Permitted Activities – Delete proposed unpermitted activity (a)(xii)	The Transport Agency made a primary submission in general support, subject to seeking a minor amendment – increasing the vehicles from one to three. The Transport Agency prefers its submission as it allows more certainty.	Relief as outlined in the Transport Agency's primary submission (and as outlined below). <i>The maintenance, repair, storing, or parking of more than one three heavy vehicles (excluding agricultural machinery) with a gross laden weight of 3,500 kilograms or more, that is being used for, or in connection with, any commercial, industrial or rural industrial activity.</i>	Oppose .30
#1521 Federated Farmers of New Zealand PO Box 5242 Dunedin kreilly@fedfarm.org.nz	C60.1521.11 Amend proposed changes to support more flexible subdivision rules and enable small-lot subdivision in rural zones	The Transport Agency is concerned that reducing the minimum lot size for subdivision would result in cumulative transport effects. The Transport Agency is aware that a zone review has not been undertaken prior to the Rural Zone Objectives, Policies and, Rules being assessed. However, this does not mean that taking an ad hoc approach to planning is appropriate. The Transport Agency also considers that the pending zone review means little weight should be given to the plan change in the interim.	One method to implement this could be through a Restricted Discretionary Rule to manage additional traffic generation adjacent to the State highway. In most locations this would be for safety purposes, though there are efficiency issues in some areas that the Plan Change needs to manage appropriately. Details are outlined in the further submission on C60.806.36. The Transport Agency would consider appropriate alternative methods.	Oppose .31
	C60.1521.21	The Transport Agency is concerned that reducing the minimum lot size for	Retain provision as notified.	Oppose

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
	16.3.5.3A Restricted Discretionary Subdivision	subdivision would result in cumulative transport effects.		
	Amend proposed condition (b) by reducing the average net area of all allotments to 2 hectares.	Rural 1 and 2 zoned land has been given particular emphasis to protect and prioritise animal and plant farming and production. Allowing small sized subdivision to occur undermines the intent of the associated policy framework and also changes the basis of a "rural zone".		.32
	C60.1521.24	The Transport Agency is concerned that reducing the minimum lot size for subdivision would result in cumulative transport effects.	As per the relief outlined for C60.1521.11.	Oppose
	16.3.6.3A Restricted Discretionary Subdivision (Rural 2 Zone)			
	Amend proposed rule 16.3.6.3A to provide flexibility in the number and size of allotments, depending on what is appropriate for the locations and surrounding landscape.	Rural 1 and 2 zoned land has been given particular emphasis to protect and prioritise animal and plant farming and production. Allowing small sized subdivision to occur undermines the intent of the associated policy framework and also changes the basis of a "rural zone".		.33
	C60.1521.27			
	17.5.2.1 – Permitted Activities Retain proposed condition (a) (xiv)	The Transport Agency made a primary submission in general support, subject to seeking a minor amendment – increasing the vehicles from one to three. The Transport Agency prefers its submission as it allows more certainty.	Relief outlined in the Transport Agency's primary submission (and as outlined below). <i>The maintenance, repair, storing, or parking of more than one three heavy vehicles (excluding agricultural machinery) with a gross laden weight of 3,500 kilograms or more, that is being used for, or in connection with, any commercial, industrial or rural industrial activity.</i>	Oppose in part .34
	C60.1521.28			
	17.6.2.1 – Permitted Activities	The Transport Agency made a primary submission in general support, subject to seeking a minor amendment – increasing the	Relief outlined in the Transport Agency's primary submission (and as outlined below).	Oppose in part

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
	Retain proposed condition (a) (xii)	vehicles from one to three. The Transport Agency prefers its submission as it allows more certainty.	<u>The maintenance, repair, storing, or parking of more than one three heavy vehicles (excluding agricultural machinery) with a gross laden weight of 3,500 kilograms or more, that is being used for, or in connection with, any commercial, industrial or rural industrial activity.</u>	.35
	C60.1521.29 17.7.2.1 – Permitted Activities Retain proposed condition (a) (xii)	The Transport Agency made a primary submission in general support, subject to seeking a minor amendment – increasing the vehicles from one to three. The Transport Agency prefers its submission as it allows more certainty.	Relief outlined in the Transport Agency's primary submission (and as outlined below). <u>The maintenance, repair, storing, or parking of more than one three heavy vehicles (excluding agricultural machinery) with a gross laden weight of 3,500 kilograms or more, that is being used for, or in connection with, any commercial, industrial or rural industrial activity.</u>	Oppose in part .36
#2799 Tasman District Council Staff Manager, Environment and Planning Tasman District Council Private Bag 4, Richmond dennis.bush = king@tasma	C60.2799.1 17.5.3.1 Permitted Activities (Building, Construction, Alteration or Use) Amend 17.5.3.1 (ca) and where it similarly appears within the Plan to add the words: "except as provided for in condition (cb)" in front of the words "there is no more than two sleepouts for any dwelling" C60.2799.2 17.5.3.1 Permitted Activities (Building, Construction, Alteration or Use) Amend 17.5.3.1 and where it applies throughout to ass a new condition "(cb) There are no	The Transport Agency supports limiting the number of sleepouts to two because of the potential transport effects. The Transport Agency supports limiting sleepouts to the primary dwelling only. If it was extended to minor dwellings also, it could have adverse impacts on the transport network.	As per the Council's submission. As per the Council's submission.	Support .37 Support .38

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
n.govt.nz	sleepouts associated with any minor dwelling”			
C60.2799.3	17.5.3.3 Restricted Discretionary Activities (Building, Construction, Alteration or Use)	The addition of more dwellings than is currently proposed, as a permitted activity, is of concern to the Transport Agency. If additional dwellings were allowed to occur unmanaged, then there is no way to know or predict what the transport network requirements will be. This could impact on the safe and efficient use of the transport network.	As per the relief laid out in the Transport Agency further submission on the primary submission, above.	Oppose in part .39
Amend 17.5.3.3 (b)	to add the following words: Except as provided for in condition (ba) in front of the words “a site containing more than one dwelling has a minimum areas of 24 hectares...”			
C60.2799.4	17.5.3.3 Restricted Discretionary Activities (Building, Construction, Alteration or Use)	The addition of more dwellings than is currently proposed, as a permitted activity, is of concern to the Transport Agency. If additional dwellings were allowed to occur unmanaged, then there is no way to know or predict what the transport network requirements will be. This could impact on the safe and efficient use of the transport network.	As per the relief laid out in the Transport Agency further submission on the primary submission, above.	Oppose in part .40
Amend 17.5.3.3 (b)	to add a new condition (ba): “the activity is a second dwelling that is a minor dwelling and the principal dwelling contains a single housekeeping unit only”			
C60.2799.6	7.2.3.1G Enabling of Some Cooperative Living Opportunities	The Transport Agency would be interested in understanding the specifics of the Council’s vision in this area. We look forward to seeing a draft.	Unable to specify without knowing the details.	Neutral – may change depending on content .41
Amend objective 7.2.3.1G	to better articulate Council’s vision for cooperative living in terms of the co-operation intention, scale, intensity			

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
	and character, which can achieve the rural character and amenity, and plant and animal production objectives of the Tasman Resource Management Plan	The Transport Agency is interested in this provision and what the final form will take. There is potential for this provision to cause cumulative adverse effects. We look forward to seeing a draft.	Unable to specify without knowing the details.	Neutral – may change depending on content 43
# 4023 Hancock Forest Management (NZ) Ltd PO Box 1860 Whangarei 0110 tdwane@hnrq.com	C60.4023.6 Include definition of reverse sensitivity.	The Transport Agency is particularly conscious of reverse sensitivity, particularly regarding the vulnerability of an established activity to complaint from a new land use, i.e. effects of new residential development locating close to the State highway and then complaining about noise. Having a robust definition in place will help identify the issue more clearly.	The Transport Agency suggests the leading court derived definition of: “the effects of the existence of sensitive activities on other existing activities in the vicinity, particularly by leading to restraints on the carrying on of those other existing activities.”. This comes from <i>Auckland RC v Auckland CC</i> [1997] NZRMA 205 (EC).	Support in part 44
# 4068 Rural	C60.4068.10	A Rural Contractors depot shouldn't be more permissive than a rural industrial activity. The	Oppose the inclusion of the provision.	Oppose

Submission Number and Name	Parts of the submission supported or opposed	Reason	Relief	Support / Oppose
Contractors New Zealand Inc PO Box 97431 Graeme.mathieson@emslimited.co.nz	Chapter 17 – Zone Rules Include in conditions 17.5.2.1(a), 17.6.2.1(a) and 17.7.2.1(b) a new unpermitted activity as follows: “A rural contractor depot that employs more than 10 persons.”	Transport implications are often more than minor. Additionally, 10 employees for a permitted activity is a very high threshold. This should be based more specifically on traffic movements, if anything at all. At a minimum, where the activity has access to the State highway, including side roads that intersect with it, it should be Restricted Discretionary.	Rural contractors should continue to remain within the definition of industrial activities and subject to the same provisions, or subject to a restricted discretionary rule as outlined below.	. 42
C60.4068.11 Chapter 17 – Zone Rules Include a new Restricted Discretionary activity rule in 17.5.2.8A, 17.6.2.8A and 17.7.2.5A for rural contractor’s depots, as follows: “A rural contractor depot that is not provided for as a permitted activity under Rule 17.5.2.1(a) is a restricted discretionary activity. Resource consent is required. Consent may be refused or conditions imposed, only in respect of the matters to which Council has restricted its discretion: (a) Effects of the safety and efficiency of the transport network. (b) Reverse sensitivity effects.”	The Transport Agency supports a restricted discretionary activity status for rural contractor’s depots, and also supports restricting the Council’s discretion to the safety and efficiency of the transport network (among other matters). However, the Transport Agency considers this rule should apply to all rural contractors’ depots with access to a State highway, or with access to side roads that access a State highway (rather than only applying to contractor’s depots with more than 10 employees).	Include a restricted discretionary activity rule which applies to all Rural Contractors’ Depots which access a State highway, or which access a local road which accesses a State highway. The rule should provide for the safety and efficiency of the transport network as a matter which the Council’s discretion is restricted to.	. 43	Oppose in part.