



*Tasman Resource Management Plan*

**Plan Change 66**  
**Richmond Housing Choice**

**Notified 14 October 2017**

**Original Submissions**  
**incl. Submitter & Submission Numbers**

**December 2017**

**Submitters  
on  
Plan Change 66  
Richmond Housing Choice**

**I N D E X**

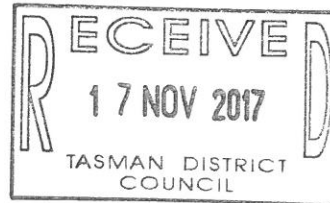
<b>Name</b>	<b>No.</b>	<b>Page #</b>
Batt, Roger	4138	34
Borcovsky, Paul & Nita	4139	36
Burt, David	4140	38
Burt, Ronald & Shirley	4141	42
Butler, Edward	4152	71
Butler, Lynnette	4150	66
Castle, Bridget	4142	44
Gibson, Graeme & Ronnie	4145	49
Gimelfarb, Lev	4143	46
Heritage New Zealand	849	1
Horticulture New Zealand	2864	24
Jones, Sarah	4144	47
McNicoll, Karen	4151	69
Michael Reid Ltd	4148	58
National Council of Women – Tasman Local Issues Group	1503	10
Nelson Marlborough Health	1823	12
Nelson Tasman Housing Trust	4146	52
Palmer, John	4147	55
Tasman District Council	2799	18
Thomas, Graham	3461	31
Williams, Ben	4149	64



14 November 2017

File ref: 33002-093

Tasman District Council  
Private Bag 4  
Richmond 7050



Email: [tasmanrmp@tasman.govt.nz](mailto:tasmanrmp@tasman.govt.nz)

**SUBMISSION OF HERITAGE NEW ZEALAND POUHERE TAONGA ON THE PROPOSED PLAN  
CHANGE 66 – RICHMOND HOUSING CHOICE**

1. **This is a submission on the following proposed plan:**  
Proposed Plan Change 66 – Richmond Housing Choice
2. **Heritage New Zealand Pouhere Taonga could not gain an advantage in trade competition through this submission.**
3. **The specific provisions of the proposal that Heritage New Zealand Pouhere Taonga's submission relates to are:**  
The matters within the plan changes relating to historic and cultural heritage.
4. **Heritage New Zealand Pouhere Taonga's submission is:**  
See Attachments 1 and 2.
5. **The reasons for Heritage New Zealand's position are as follows:**  
See Attachments 1.
6. **Heritage New Zealand seeks the following decision from the local authority:**  
See Attachment 1.
7. **Heritage New Zealand wishes to be heard in support of our submission.**

Yours sincerely

Karen Astwood  
Acting Director  
Central Region  
Heritage New Zealand Pouhere Taonga

Attachments:

1. Plan Change 66 Submission Table
2. Example Appendix of Archaeological Requirements

Address for Service:

Finbar Kiddle

Planner

Central Region

Heritage New Zealand Pouhere Taonga

PO Box 2629

Wellington 6140

DDI: 04-494-8325

Email: [PlannerCR@heritage.org.nz](mailto:PlannerCR@heritage.org.nz)

Attachment 1: Heritage New Zealand Pouhere Taonga Submission on Proposed Plan Change 65

Proposed Plan Provision	Support or Oppose	Reasons for Submission	Relief Sought Strike: abc = deletion Underline: abc = insertion
<b>Plan Change 65</b>			
1 6.0	Oppose in part	Another key locational and urban form issue is how development can adversely affect historic heritage, both on individual heritage resources and on wider areas of heritage value and character. Increased medium and high-density development especially has the potential to exacerbate this issue, as it is more likely to be out of scale with surrounding historic heritage. This effect should be acknowledged.	That the following be added to the key locational and urban form issues:  (1) <u>The effect of urban development and expansion on historic and cultural heritage.</u>
2 6.1.3.1	Oppose in part	Subdivision and development should also incorporate sustainable urban design principles that address adverse effects on historic heritage values, this applies to both historic heritage within the site and surrounding it. For example, where there are significant archaeological sites present on the land (for example, pā), lots should be sized to allow sufficient space for future development to avoid that site. Another example is that where a high or medium density development abuts a smaller heritage building, appropriate setbacks and potentially stepped height levels are needed to maintain an appropriate sense of scale.	That 6.1.3.1 be amended as follows:  ... (i) locating and designing development to address cross-boundary effects between land uses and on historic heritage values.  ... (l) <u>locating and designing subdivision and development to facilitate the avoidance of cultural heritage sites where appropriate.</u>
1 16.3.3.1(ma)	Support with amendment	Heritage New Zealand supports the requirement whereby a controlled activity standard is obtaining an archaeological authority and that an appropriate check is in place so that this does not need to be complied with where an archaeological authority is not required.  However, the current drafting implies that either an authority from Heritage New Zealand or a letter would be required for every subdivision. This places an unnecessary burden on Heritage New Zealand for those subdivisions where there is negligible risk	That 16.3.3.1(ma) be replaced with:  <u>Where the land being subdivided contains a cultural heritage site, all ancillary earthworks to the subdivision must avoid any modification or destruction of recorded archaeological sites and areas where there is reasonable cause to suspect the presence of unrecorded archaeological sites, except as authorised through an archaeological authority obtained under the Heritage New Zealand Pouhere Taonga Act 2014 or</u>

849

Attachment 1: Heritage New Zealand Pouhere Taonga Submission on Proposed Plan Change 65

2	16.3.3.1(mb)	Support with amendment	<p>to archaeology. Rather, the rule should apply where the land being subdivided contains a cultural heritage site. This protects archaeology, while avoiding placing an unnecessary burden on the applicant, Council, and Heritage New Zealand.</p> <p>Further, an integral part of an archaeological assessment, such as that required under 19.2.2.41(b), is an assessment by the archaeologist of whether an archaeological authority should be obtained. Heritage New Zealand considers that this assessment is sufficient, and a letter from Heritage New Zealand is not required where the assessment advises that an authority is not required.</p> <p>Finally, current drafting applies to subdivisions generally. However, subdivision by itself does not require an archaeological authority; rather, it is any earthworks ancillary to the subdivision activity. The drafting should make this clear so as to avoid unnecessary regulatory burden.</p> <p>This same rule is replicated in 16.3.4.1(zd), 16.3.5.1(p), 16.3.6.1(n), 16.3.7.1(k), and 16.3.8.1(k). The relief sought should be extended to these rules to ensure plan consistency and usability.</p>	<p>where an assessment prepared under 19.2.2.41(b) advises that an archaeological authority is not required.</p> <p>That the relief sought be extended to 16.3.4.1(zd), 16.3.5.1(p), 16.3.6.1(n), 16.3.7.1(k), and 16.3.8.1(k).</p>
2	16.3.3.1(mb)	Support with amendment	<p>Heritage New Zealand supports the rule; however, the current drafting is confusing, as it does not mention the land being subdivided. The rule should apply where the land being subdivided contains a cultural heritage site identified as a wāhi tapu site.</p> <p>This same rule is replicated in 16.3.4.1(ze), 16.3.5.1(q), 16.3.6.1(o), 16.3.7.1(l), and 16.3.8.1(l). The relief sought should be extended to these rules to ensure plan consistency and usability.</p>	<p>That 16.3.3.1(mb) be amended as follows:</p> <p><del>Where the listed cultural heritage site is a wāhi tapu site, Where the land being subdivided contains a cultural heritage site identified as a wāhi tapu site,</del> manawhenua iwi have given their written approval to the proposed activity as an affected party.</p> <p>That the relief sought be extended to 16.3.4.1(ze), 16.3.5.1(q), 16.3.6.1(o), 16.3.7.1(l), and 16.3.8.1(l).</p>
3	16.3.3.1 Cultural	Support with amendment	<p>Heritage New Zealand supports the inclusion of an advice note on uncovering archaeological sites; however, it is important that the</p>	<p>That Note 3 be replaced with:</p> <p>Appendix X sets out archaeological requirements under</p>

**Attachment 1: Heritage New Zealand Pouhere Taonga Submission on Proposed Plan Change 65**

Heritage Sites Notes (3)		<p>advice note does not lead any applicant into non-compliance with the Heritage New Zealand Pouhere Taonga Act 2014 process. Where an archaeological authority has been obtained, it will include provisions addressing the exposure of cultural heritage sites. Attachment 2 contains an example appendix setting out archaeological requirements, which also includes an accidental discovery protocol. Heritage New Zealand recommends that, rather than reproducing the same advice note throughout the plan, Attachment 2 be added to the Plan as an appendix and then referenced in appropriate places.</p> <p>This note is replicated in 16.3.4.1, 16.3.5.1, 16.3.6.1, 16.3.7.1, and 16.3.8.1. The relief sought should be extended to these rules to ensure plan consistency and usability.</p>	<p><u>the Heritage New Zealand Pouhere Taonga Act 2014, it covers:</u></p> <ul style="list-style-type: none"> <li>• <u>the definition of an archaeological site;</u></li> <li>• <u>how to identify recorded archaeological sites and areas where unrecorded sites can be suspected; and</u></li> <li>• <u>an accidental discovery protocol for use where an archaeological authority is not required.</u></li> </ul> <p>That the relief sought be extended to 16.3.4.1, 16.3.5.1, 16.3.6.1, 16.3.7.1, and 16.3.8.1.</p>	8
4 16.3.3.1 Matter of control 17	Support with amendment	<p>Heritage New Zealand supports the matter of control as they provide the necessary breadth to consider relevant matters; for example, 17(d) allowing consideration of the provision of access for cultural purposes. However, the word 'listed' should not be used as it can create confusion with properties listed on the New Zealand Heritage List / Rārangī Kōrero. The Plan already contains an appropriate definition of 'cultural heritage site' so the word 'listed' can be removed.</p> <p>This matter of control is replicated in 16.3.4.1(23), 16.3.5.1(17), 16.3.6.1(16), 16.3.7.1(14), and 16.3.8.1(17). The relief sought should be extended to these rules to ensure plan consistency and usability.</p>	<p>That 16.3.3.1(17) be amended as follows:</p> <p>Where there is a <del>listed</del> cultural heritage site present on any part of the land being subdivided:</p> <p>...</p> <p>That the relief sought be extended to 16.3.4.1(23), 16.3.5.1(17), 16.3.6.1(16), 16.3.7.1(14), and 16.3.8.1(17).</p>	10
5 16.3.3.1(d)	Support	<p>It is appropriate that subdivision in the Richmond Intensive Development area be subject to the same heritage controls as subdivision in the Standard Density Development area.</p>	<p>Retain 16.3.3.1(d) as notified.</p>	12
6 16.3.3.1.1A matter of control 13	Support with amendment	<p>This matter of control contains additional detail that is also relevant for subdivision applications in the Standard Density Development area. Therefore, these matters should be added to</p>	<p>That 16.3.3.1.1A(13) be added to 16.3.3.1 and then cross-referenced.</p>	13

14  
249

Attachment 1: Heritage New Zealand Pouhere Taonga Submission on Proposed Plan Change 65

7	16.3.3.2(1)	Support with amendment	<p>the matters of control for 16.3.3.1 and then cross-referenced as is done by 16.3.3.1A(b).</p> <p>See submission point 4.</p> <p>This matter of discretion is replicated in 16.3.4.3(1), 16.3.5.3(1), 16.3.6.3(1), 16.3.7.3(1), and 16.3.8.2(1). The relief sought should be extended to these rules to ensure plan consistency and usability.</p>	<p>That the rule be amended as follows:</p> <p>Where there is a listed cultural heritage site present on any part of the land being subdivided:</p> <p>...</p> <p>That the relief sought be extended to 16.3.4.3(1), 16.3.5.3(1), 16.3.6.3(1), 16.3.7.3(1), and 16.3.8.2(1).</p>	<p>15</p>
8	19.2.2.41	Support with amendment	<p>Heritage New Zealand supports the requirement for an applicant to produce a cultural heritage site assessment. However, an important consideration for any assessment is those areas where unrecorded archaeological sites can reasonably be suspected. 19.2.2.41 should be amended to provide for this.</p>	<p>That 19.2.2.41(b) be amended as follows:</p> <p>Any site that is an archaeological site that must be prepared by an appropriately competent archaeologist and address:</p> <p>(i) the location and extent of any cultural heritage sites and areas where there is reasonable cause to suspect the presence of unrecorded archaeological sites, using a hand-held GPS or similar device to locate the site or area accurately;</p> <p>...</p> <p>(iv) any recommended actions to avoid the potential for the modification, damage or destruction of any identified cultural heritage site or area where there is reasonable cause to suspect the presence of unrecorded archaeological sites in terms of its archaeological values</p>	<p>16</p>
8	19.2.2.41	Support with amendment	<p>Heritage New Zealand supports the requirement for an applicant to produce a cultural heritage site assessment. However, an important consideration for any assessment is those areas where unrecorded archaeological sites can reasonably be suspected. 19.2.2.41 should be amended to provide for this.</p>	<p>That 19.2.2.41(b) be amended as follows:</p> <p>Any site that is an archaeological site that must be prepared by an appropriately competent archaeologist and address:</p> <p>(i) the location and extent of any cultural heritage sites and areas where there is reasonable cause to suspect the presence of unrecorded archaeological sites, using a hand-held GPS or similar device to locate the site or area accurately;</p> <p>...</p> <p>(iv) any recommended actions to avoid the potential for the modification, damage or destruction of any identified cultural heritage site or area where there is reasonable cause to suspect the presence of unrecorded archaeological sites in terms of its archaeological values</p>	<p>17</p>





## Appendix of Archaeological Requirements

This appendix sets out information to alert Tasman District Council staff and contractors regarding archaeological sites. This is relevant to the demolition/destruction of any structure associated with human activity prior to 1900, and earthworks or other activities that may disturb pre-1900 surface or sub-surface archaeological sites or material.

An archaeological site is as defined by the Heritage New Zealand Pouhere Taonga Act 2014 as being:

- a) any place in New Zealand, including any building or structure (or part of a building or structure), that:
  - i. was associated with human activity that occurred before 1900 or is the site of the wreck of any vessel where the wreck occurred before 1900; and
  - ii. provides or may provide, through investigation by archaeological methods, evidence relating to the history of New Zealand

It is also possible for Heritage New Zealand Pouhere Taonga (Heritage New Zealand) to declare a post-1900 site as an archaeological site.

### Archaeological authority required from Heritage New Zealand

An archaeological authority from Heritage New Zealand should be obtained prior to the commencement of works noted above. It is an offence to modify or destroy an archaeological site, or demolish/destroy a whole building, without an authority if the person knew or ought to reasonably suspect it to be an archaeological site. For further information, contact Heritage New Zealand. The relevant legislation is the Heritage New Zealand Pouhere Taonga Act 2014, in particular sections 42 and 44 of that Act.

### Known or suspected archaeological sites

The following resources may assist in determining if an archaeological site is or may be present:

- historic and cultural heritage items scheduled in the Tasman Resource Management Plan;
- outstanding natural features and landscapes scheduled in the Tasman Resource Management Plan with specified archaeological and/or historical heritage values;
- sites listed by the New Zealand Archaeological Association's Archaeological Site Recording Scheme (latest information is on the NZAA website) at [www.archsite.org.nz](http://www.archsite.org.nz); and
- written and oral histories of the area, including those of Tangata Whenua.

### Archaeological discovery without an authority (Protocol)

If an authority has not been obtained and there was no reasonable cause to suspect archaeological sites are present (if there is reasonable cause then an authority should be obtained), the following protocol must be followed when an archaeological site is discovered:

- 1) Work shall cease immediately at that place and within 20m around the site.
- 2) The contractor must shut down all machinery, secure the area, and advise the Site Manager.
- 3) The Site Manager shall secure the site and notify the Heritage New Zealand Regional Archaeologist. Further assessment by an archaeologist may be required.

**Attachment 2: Heritage New Zealand Pouhere Taonga Example Appendix of Archaeological Requirements**

849

- 4) If the site is of Maori origin, the Site Manager shall notify the Heritage New Zealand Regional Archaeologist and the appropriate iwi groups or kaitiaki representative of the discovery and ensure site access to enable appropriate cultural procedures and tikanga to be undertaken, as long as all statutory requirements under legislation are met (Heritage New Zealand Pouhere Taonga Act, Protected Objects Act).
- 5) If human remains (koiwi tangata) are uncovered, the Site Manager shall advise the Heritage New Zealand Regional Archaeologist, NZ Police and the appropriate iwi groups or kaitiaki representative. The above process under 4 shall also apply. Remains are not to be moved until such time as iwi and Heritage New Zealand have responded.
- 6) Works affecting the archaeological site and any human remains (koiwi tangata) shall not resume until Heritage New Zealand gives written approval for work to continue. Further assessment by an archaeologist may be required.
- 7) Where iwi so request, any information recorded as the result of the find such as a description of location and content, is to be provided for their records.
- 8) Heritage New Zealand will determine if an archaeological authority under the Heritage New Zealand Pouhere Taonga Act 2014 is required for works to continue.

COVER SHEET

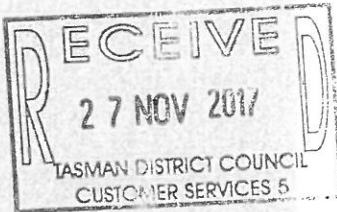


Return your submission by the advertised closing date to: Environmental Policy Tasman District Council Private Bag 4, Richmond 7050 OR 189 Queen Street, Richmond OR Fax 03 543 9524 OR Email: tasmanrmp@tasman.govt.nz

Submission on a Change to the Tasman Resource Management Plan (TRMP)

OFFICE USE

Date received stamp:



Initials:

Submitter No. 1503

Note: This form is only for the purpose of making a submission on the Plan. It is NOT for making a further submission (i.e. in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.

Submitter Name: National Council of Women - Tasman Local Issues Group (organisation/individual)

Representative/Contact: Alison Heslop (if different from above)

Postal Address:

10 Harriet Court, Richmond 7020

Phone: 03 5445067

Fax:

Email: aliheslopnz@gmail.com

Date: 27 Nov 2017

Postal address for service of person making submission: (if different from above)

[Empty box for postal address]

Total number of pages submitted (including this page):

Signed: Alison Heslop. 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.:

Change Title/Subject: Richmond Housing Choice Proposed Plan Change

- I/we wish to be heard in support of my/our submission.
I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Could you gain an advantage in trade competition through this submission? (tick one) Yes No

If 'Yes' are you directly affected by an effect of the subject matter of this submission that:

- adversely affects the environment; and
does not relate to trade competition or the effects of trade competition?

(tick one) Yes No

National Council of Women, Tasman Local Issues Group

I have discussed with several members of our group and we are agreed that changing an area of Richmond in upper Queen St and Salisbury to Darcy St block is a good idea. (1)

Allowing for 200sq metres section size and 7metre building height would accommodate more small households within walking distance of the town. This could give a useful option for elderly or disabled who do not have a driving licence, as well as being more modern accommodation suited to disabled living.

Because of the concentration of schools near the areas we think that cyclist tracks on Salisbury need to be separated from motor vehicles where possible and this may be a chance to do this at the time of re zoning. (2)

Richmond, like most towns and cities in New Zealand, keeps expanding the town boundaries to take in more arable land for housing

New Zealand needs to keep the arable land and try and use less productive type of land for housing. Developers find hill land more costly to develop but this country needs to keep our food supply secure by retaining easy to work high quality land for horticulture and agriculture.

Already it is difficult to buy foods such as berries and be sure they are grown in New Zealand under our strict protections.

We commend the Tasman District Council for this proposed Plan change and support it.

Alison Heslop, National Council of Women, Tasman Local Issues



**Submission on Tasman  
District Council Proposed  
Plan Change 66:  
Richmond Housing  
Choice**

**27 November 2017**

For more information please contact:  
Angela Lenz  
NMDHB Public Health Service  
Email: [angela.lenz@nmdhb.govt.nz](mailto:angela.lenz@nmdhb.govt.nz)  
Phone: (03) 543 7805

## Introduction

1. Nelson Marlborough Health (Nelson Marlborough District Health Board) (NMH) is a key organisation involved in the health and wellbeing of the people within Te Tau Ihu. NMH appreciates the opportunity to comment from a public health perspective on the Tasman District Council Proposed Plan Change 66: Richmond Housing Choice.
2. NMH makes this submission in recognition of its responsibilities to improve, promote and protect the health of people and communities under the New Zealand Public Health and Disability Act 2000 and the Health Act 1956.

## General support

3. NMH strongly supports the purpose of the Proposed Plan Change to encourage medium density housing in Richmond, close to the town centre. ①
4. The sustainable use of land and infrastructure, compact walkable neighbourhoods promoting incidental exercise and improved social interactions, and more affordable housing for smaller household sizes are just some of the benefits that urban intensification can provide, leading to improved community health and wellbeing outcomes.
5. However, NMH considers that the Proposed Plan Change needs to go a step further in order to effectively provide a diversity and form of housing which caters for Tasman's ageing population and/or those living with disabilities.

## Housing that caters for older people and people with disabilities

6. Nelson Marlborough has a higher proportion of its population in the 65+ year age group than other New Zealand regions, and this difference has increased between the last two Census years to a greater degree in Nelson Marlborough.<sup>1</sup> Tasman and Marlborough are projected to have the largest rate of growth of people aged 75+ years, over doubling by 2033.<sup>2</sup>
7. NMH believes that allowing the intensification of brownfield locations, close to amenities and services, is necessary in providing for the region's ageing population to "age in place" (live at home into your older years). Older persons generally state a strong preference for living in their own home or non-institutional community settings.<sup>3</sup> Private homeownership has been associated with better health outcomes for older people as it alleviates the financial pressures and anxiety associated with high accommodation costs and minimal security of occupancy.<sup>4</sup> Subsequently there is a growing demand for smaller houses and properties.<sup>5</sup>
8. Additionally, adults living with a disability are more likely to be living alone or with a partner only.<sup>6</sup> NMH considers that an increase in the availability of smaller, easy

care properties close to amenities and services may go towards providing greater independence and more housing choice.

9. However, in addition to encouraging smaller compact properties, housing also needs to be functional. Key factors include accessibility (ease of entering and navigating in and around the home) and adaptability (to cater for changing needs such as experiencing an injury or disability). <sup>2</sup>
10. Older people have more sensory and physical limitations than younger people. Housing that does not meet their needs exacerbates existing health conditions and heightens the impacts of impairment. This triggers dislocation from their communities, admission to an unnecessarily high level of care and support, and shifts the cost of what is primarily a housing problem onto the health and social services sectors.<sup>7</sup>
11. New Zealanders living with a disability also find it "impossible" to buy homes that meet their needs, and it is also very difficult to find suitable rental properties.<sup>8</sup>
12. The Proposed Plan Change recognises the need for housing to function effectively. Its explanatory statements and provisions refer to the need for diversity and choice of housing density and form to cater for a changing demographic profile and a range of living options, and the need to take into account people's preferences.
13. However, NMH considers that these high level provisions need to be underpinned and strengthened by policy and methods which support the implementation of universal design principles to ensure that Tasman housing is accessible and the opportunity to age in place or live independently is provided for. While proposed policy 6.1.3.1A of the Plan Change requires consideration of TDC's Urban Design Guidelines, NMH notes that these guidelines only discuss accessibility insofar as residents accessing surrounding urban facilities. <sup>2</sup> <sup>3</sup>
14. Universal housing suits a family's needs over a lifetime and can easily be adapted with minimal cost to meet individual and specialist needs. Dwellings have long lifetimes and at some stage in a dwelling's life it will be either occupied or visited by someone with mobility issues.<sup>7</sup> Universal design ensures a home is sustainable and can be adapted to meet the life-time needs of the resident from the stage where they have young children in pushchairs to when they are elderly and/or have a disability.<sup>9</sup> Specifically, it 'describes the concept of designing housing features to be aesthetic and usable to the greatest extent possible by everyone, regardless of their age, ability, or status in life'.<sup>10</sup>
15. Universal design can also lessen the impact of falls. Nearly 400,000 medically treated injuries attributed to falls occurred in the home and community settings in 2012.<sup>11</sup> A community trial in Taranaki has shown that the adoption of universal design modifications have resulted in an estimated 26% reduction in the rate of



injuries caused by falls at home per year in those houses where modifications have been made.<sup>11</sup>

16. BRANZ research<sup>8</sup> has shown that it is considerably cheaper and less disruptive to incorporate universal design features into a new build than retrofit the same house later. As an example, the average extra cost of equipping a new house with universal design features is \$1,720 while retrofitting these new houses at a later date would cost an extra \$16,990 on average (using 2011 figures). (3)
17. The uptake of universal design principles is more critical given that the proposed plan change allows an increased building height to two stories. While NMH agrees that allowing some two-storey housing is appropriate for intensification purposes, it is concerned that the plan change will predominately result in this form of building with the proposed new minimum lot size of 200m<sup>3</sup> and an increased building coverage of 50%, and such an option being attractive to developers. Although some people want two-storey houses, 80% of demand is for one-storey compact housing.<sup>12</sup> Furthermore, unless specific design features are incorporated during the build phase of a two-storey home, it is unlikely to be suitable for ageing residents and/or those living with a disability. (4)
18. In order to meet the strategic goal of providing housing that caters for Tasman's changing demographic profile and offers a range of living options, NMH considers that developers need to be provided financial incentives to incorporate universal design features within the smaller brownfield developments that the plan change is seeking. Incentives may include measures such as reducing development contributions and reserve financial contributions, structuring policy and rules to reduce uncertainty and costs for building consent processes, and/or allowing an increased building coverage for homes that incorporate universal design standards as done by Thames-Coromandel District Council.<sup>13</sup> (5)
19. Additionally, NMH believes that consideration should be given to requiring the incorporation of universal design standards within a certain proportion of large multi-unit developments. The following standards are used by Banyule City Council in Melbourne, Australia<sup>14</sup>: (6)
  - a) 10+ dwellings = minimum 20% of dwellings incorporate Liveable Housing Design Guidelines
  - b) 3-9 dwellings = minimum of one dwelling incorporate Liveable Housing Design Guidelines
  - c) 1-2 dwellings = voluntary incorporation of guidelines.

*Relief sought*

20. That policy is strengthened by making the following recommended amendments (additions are shown in **bold**):

*Proposed Policy 6.1.3.1A*

*To encourage medium density housing developments that achieve a high standard of amenity **and functionality** in areas identified on the planning maps as the Richmond South, Richmond West, Mapua Special and Richmond Intensive development areas and the Motueka West Compact Density Residential Area by:*

- (a) ensuring the suitable and compatible location, height, density, scale and bulk of intensive residential development relative to its context and adjacent land uses, including streets and reserves*
- (b) encouraging best practice and design through the use of the Council's Urban Design Guide*
- (c) promoting and incentivising new residential buildings that incorporate universal design principles in providing for occupants' life stages and changing physical needs.***

21. That methods for achieving the policy include financial incentives for developers that incorporate universal design features within medium density housing developments e.g. reduced development contributions and reserve financial contributions, reduced uncertainties and costs for the building consent process, allowing an increased building coverage.

22. That consideration be given to requiring the incorporation of universal design standards within a certain proportion of large multi-unit developments.

### **Conclusion**

23. NMH thanks TDC for the opportunity to comment on the Proposed Plan Change.

24. While NMH supports the intent of the Proposed Plan Change, it considers that it could go further in providing a diversity and form of housing which caters for Tasman's ageing population and general preference to age in place, and those with a disability wanting to lead more independent lives.

25. NMH **does not wish to be heard** in support of its submission.

Yours sincerely



Peter Bramley  
**Chief Executive**  
 peter.bramley@nmdhb.govt.nz

## References

- <sup>1</sup> Norrish A. 2017. *Aged population profile for the Nelson Marlborough District: 2013 Census data*. Richmond: Nelson Marlborough Public Health Service
- <sup>2</sup> Heslop M, Bullen C, Cassidy T. 2017. *Health Promotion Services Review*. Report prepared for the Nelson Marlborough District Health Board.
- <sup>3</sup> Nelson Marlborough District Health Board. 2015. *Nelson Marlborough health needs and service profile 2015*. Nelson: Nelson Marlborough District Health Board
- <sup>4</sup> Waldegrave C, Urbanova M. 2016. Social and economic impacts of housing tenure. A report for the New Zealand Housing Foundation. Wellington: Family Centre Social Policy Research Unit.
- <sup>5</sup> Nelson City Council. 2017. *Nelson's aging population*. A background paper. Nelson: Nelson City Council.
- <sup>6</sup> Stats New Zealand. 2017. *Disability and housing conditions: 2013*. Accessed 16 November 2017 [http://m.stats.govt.nz/browse\\_for\\_stats/health/disabilities/disability-housing-2013.aspx](http://m.stats.govt.nz/browse_for_stats/health/disabilities/disability-housing-2013.aspx)
- <sup>7</sup> Saville-Smith K, Saville J. 2012. *Getting accessible housing: Practical approaches to encourage industry take-up and meeting need*. Centre for Research, Evaluation and Social Assessment for the Office for Disability Issues and the Ministry of Business, Innovation and Employment.
- <sup>8</sup> Stuff. 2016. *No houses available for disabled New Zealanders*. Accessed 16 November <http://www.stuff.co.nz/national/health/82528058/no-houses-available-for-disabled-new-zealanders>
- <sup>9</sup> Lifemark. 2017. *Positive changes: More access to more homes*. Accessed 16 November 2017 <http://www.lifemark.co.nz/news/positive-changes-more-access-to-more-homes/>
- <sup>10</sup> BRANZ. N.d. *Universal Design*. Accessed 14 November 2017 [https://www.branz.co.nz/cms\\_display.php?sn=215&st=1](https://www.branz.co.nz/cms_display.php?sn=215&st=1)
- <sup>11</sup> Keall MD, Nevil P, Howden-Chapman P et al. 2014. *Home modifications to reduce injuries from falls in the home, injury prevention study: A cluster-randomised controlled trial*. Otago University, Massey University and Building Research Association New Zealand.
- <sup>12</sup> Richmond Residential Advisory Group. 2015. *Richmond Residential Advisory Group recommendations to Tasman District Council on Richmond Residential Intensification*. Report prepared for the Tasman District Council.
- <sup>13</sup> Lifemark. 2016. *New initiative set to reduce cost of building consents (press release)*. Accessed 16 November <http://www.scoop.co.nz/stories/AK1608/S00105/new-initiative-set-to-reduce-cost-of-building-consents.htm>
- <sup>14</sup> Banyule City Council. N.d. *Liveable housing: Liveable Housing Design Guidelines*. Accessed 16 November 2017

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

Submission on a Change to the Tasman Resource Management Plan (TRMP)

OFFICE USE

Date received stamp:

Rec'd 24/11/17

Initials: [Signature]
Submitter No. 2799

Note: This form is only for the purpose of making a submission on the Plan. It is NOT for making a further submission (i.e. in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.

Submitter Name: Tasman District Council
(organisation/individual)

Representative/Contact: Dennis Bush-King
(if different from above)

Postal Address:

Manager
Environment and Planning
Tasman District Council
Private Bag 4, Richmond, 7050

Phone: 03 5438430

Fax:

Email: Dennis.Bush-King@tasman.govt.nz

Date:

Postal address for service of person making submission:
(if different from above)

[Empty box for postal address]

Total number of pages submitted (including this page): 5

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.: 66

Change Title/Subject: Richmond Housing Choice

- I/we wish to be heard in support of my/our submission.
I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Could you gain an advantage in trade competition through this submission? (tick one) Yes No

If 'Yes' are you directly affected by an effect of the subject matter of this submission that:

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

(tick one) Yes No

## Content Pages, Tasman District Council Staff Submission on Proposed Plan Change 66 to the Tasman Resource Management Plan

### 1. Insertion of provisions relating to public notification

#### 1.1 Proposed Plan Change 66 provisions

16.3.3.1A; 16.3.3.2B; 17.1.3.4CC

#### 1.2 Reason for Submission

Early versions of the draft plan change contained provisions that precluded applications for development that met the relevant rules from public notification. This is evident from the plan change section 32 assessment record and informal consultation material. These provisions were removed when the Resource Management Amendment Act 2017 precluded certain subdivision and land use applications from public notification. As the legislative provisions may be subject to amendment in the near future, with a new Government, the re-insertion of provisions that specifically exclude certain activity from public notification will provide certainty for all.

#### 1.3 Relief Requested

- (a) Add the words 'and without public notification' to the end of the notification note at the end of 16.3.3.1A as follows: ①

16.3.3.1A      Controlled Subdivision (Residential Zone – Specific Location:  
Richmond Intensive Development Area)

Non-Notification

Applications for resource consent that comply with the conditions of this rule 16.3.3.1A will be decided without limited notification and without public notification.

- (b) Add the following non-notification note to the end of rule 16.3.3.2B:

16.3.3.2B      Restricted Discretionary Subdivision (Residential Zone – Specific  
Location: Richmond Intensive Development Area) ②

Non-Notification

Applications for resource consent that comply with the conditions of this rule 16.3.3.2B will be decided without public notification.

- (c) Add the words 'and without public notification' to the end of the notification note at the end of 17.1.3.4CC as follows:

17.1.3.4CC      Restricted Discretionary Activities (Building Construction or  
Alteration – Specified Location: Richmond Intensive Development Area - Intensive  
Development) ③

### Non Notification

Applications for resource consent that comply with the conditions of this rule 17.1.3.4CC will be decided without limited notification and without public notification.

## 2. Correction of an error

### 2.1 Proposed Plan Change 66 provision

16.3.3.4 Discretionary Subdivision (Residential Zone) – condition (c)

### 2.2 Reason for Submission

To correct an error in 16.3.3.4(c) and to clarify the intention that either the restricted discretionary subdivision conditions of 16.3.3.2A for standard density development or, alternatively, the restricted discretionary subdivision conditions of 16.3.3.2 (relating to listed cultural heritage sites) are not met.

### 2.3 Relief Requested

Amend text by replacing the word 'and' with the word 'or' as follows:

16.3.3.4 Discretionary Subdivision (Residential Zone)

(a) Except as provided for in conditions (c), (d) and (e) of this rule, sSubdivision in the Residential Zone that does not comply with the restricted discretionary conditions of 16.3.3.2A for standard density development ~~and~~or the restricted discretionary conditions of rule 16.3.3.2 is a discretionary activity, if it complies with the following conditions:

.....

## 3. Correction of an error

### 3.1 Proposed Plan Change 66 provision

16.3.3.2 Restricted Discretionary subdivision (Residential Zone – listed Cultural Heritage Site)

### 3.2 Reason for submission

To correct a cross reference

### 3.3 Relief Requested

Amend text by replacing the reference to (y) with (ma) as follows:

16.3.3.2 Restricted Discretionary Subdivision (Residential Zone – Listed Cultural Heritage Site)

Subdivision in the Residential Zone that does not comply with controlled condition (y ma) of rule 16.3.3.1 is a restricted discretionary activity.

#### 4. Improve Plan legibility and correct an error

##### 4.1 Proposed Plan Change 66 provisions

###### 17.1.3.4BB

##### 4.2 Reason for Submission

Additional wording and the naming of the locations where compact density is available in the heading above 17.1.3.4BB (c) as a form of development will help to clarify which provisions apply to standard development (in all of the development areas) and which provisions apply only to compact density development in the sub-category of Development Area locations.

##### 4.3 Relief Requested

In the first paragraph:

- (a) change the rule references from '7' to '17'
- (b) Include the word "for standard density development" after the reference 17.1.3.2 and add the words 'compact density development' after the reference 17.1.3.3
- (c) Add the words 'Richmond South, Richmond West, Mapua Special Development Area and the Motueka West Compact Density Residential Area' to the heading above condition (c).

The amendments are shown below:

**17.1.3.4BB Restricted Discretionary Activities (Building Construction or Alteration – Specified Locations: Development Areas – Standard Density and Compact Development)**

**Richmond South, Richmond West, Motueka West, Richmond Intensive, Mapua and Mapua Special Development Areas and the Motueka West Compact Density Residential Area**

**Construction or alteration of a building: in the Richmond South, Richmond West, Motueka West, Richmond Intensive, Mapua and Mapua Special development areas and the Motueka West Compact Density Residential Area that does not comply with the conditions of rules 17.1.3.1 and 17.1.3.2 for standard density development ~~and~~ or 17.1.3.3 for compact density development, is a restricted discretionary activity, if it complies with the following conditions:**

.....

**Compact Density Development - Multiple Consents - Richmond South, Richmond West, Mapua Special Development Area and the Motueka West Compact Density Residential Area**

#### 5. Correction of errors relating to proposed stormwater provisions

##### 5.1 Proposed Plan Change 66 provision

2.2 - Meaning of words; 17.1.20; 36.4.2.1A(f)

##### 5.2 Reason for Submission

To delete a definition that is not required and to add or amend terminology for clarity and consistency purposes.

### 5.3 Relief Requested

- (a) In Chap 2.2, delete the definition of 'Groundwater Recharge,' as follows:

2.2 Defined Words

.....

~~Groundwater recharge means stormwater that passes through surface soil and adds to groundwater.~~

- (b) In Chap 17.1.20 - last paragraph - relating to the Richmond Intensive Development Area:

(i) replace the words 'groundwater recharge preservation' with the words 'infiltration of stormwater to ground';

(ii) replace the word 'secondary' with the word 'specified' as follows:

#### 17.1.20 Principal Reasons for Rules

.....

Stormwater from additional development in RIDA is managed so that it does not cause flooding or contribute to any damage caused by flooding. To that end, a permitted stormwater standard provides for onsite stormwater detention for additional site coverage resulting from new development; for ~~secondary~~ **specified** flow path protection and for partial ~~groundwater recharge~~ **infiltration of stormwater to ground** ~~preservation~~. The planning map titled 'Richmond Intensive Development Area – Specified Stormwater Flood Flowpaths' shows the major flowpaths within RIDA. It does not show minor stormwater flowpaths or flows resulting from unexpected blockages.

- (c) In 36.4.2.1A(f) add the words 'detention and' after the word 'including', as follows:

36.4.2.1A Permitted Activities (Discharge or Diversion of Stormwater or Drainage Water — Specific Location: Richmond Intensive Development Area)

.....

(f) All stormwater and sediment control structures associated with the discharge or diversion including **detention and** specified flood flowpaths are to be maintained in effective operational order at all times.

## 6. Improved clarification of provisions relating to heritage assets and protected trees

### 6.1 Proposed Plan Change 66 provisions

16.3.3.1A condition (d) (Controlled subdivision in RIDA) and matter (13)



## 6.2 Reason for Submission

To clarify the subdivision condition applies to protected trees as well as services, existing buildings, heritage site or item present, cultural heritage sites, stormwater and transport. To clarify the matter applies to protected trees as well as archaeological and heritage sites.

## 6.3 Relief Requested

- (a) Above 16.3.3.1A condition (d), insert "protected trees" in the sub-heading as follows: (10)

Services, Existing Buildings, Heritage Site or Item Present, Protected Trees, Cultural Heritage Sites, Stormwater and Transport

(d)

.....

- (b) In 16.3.3.1A matter 13, break heritage and archaeological sites and protected trees up so that matter 13 refers to archaeological or heritage sites and new matter 13A refers to protected trees and reword as follows:

Archaeological or Heritage Sites

**(13) In relation to land, including a heritage site or item referred to in Schedules 16.13A, 16.13C or 18.1A:**

- (a) whether the proposed subdivision would have an adverse or beneficial effect on the integrity or heritage value of the site or item and the extent of that effect;**
- (b) the extent to which land integral to the significance of an archaeological site or site of significance to Māori would be separated from that site;**
- (c) the provisions of any relevant management plan.**

Protected Trees

**(13A) In relation to a protected tree referred to in Schedule 16.13B:** (11)

- (a) whether the proposed subdivision would have an adverse or beneficial effect on the protected tree and the extent of that effect;**
- (b) the provisions of any relevant management plan.**

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

Submission on a Change to the Tasman Resource Management Plan (TRMP)

OFFICE USE

Date received stamp:

Initials:
Submitter No. 2864

Note: This form is only for the purpose of making a submission on the Plan. It is NOT for making a further submission (i.e. in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.

Submitter Name: Horticulture New Zealand (organisation/individual)

Representative/Contact: Rachel McLung (if different from above)

Postal Address: PO Box 10232, The Terrace, Wellington 6143

Phone: 027 582 7474
Fax:
Email: rachel.mclung@hortnz.co.nz
Date: 13 Nov 2017

Postal address for service of person making submission: (if different from above)

Total number of pages submitted (including this page): 7

Signed: R McLung
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.: PC 66

Change Title/Subject: Richmond Housing Choice

- I/we wish to be heard in support of my/our submission.
I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Could you gain an advantage in trade competition through this submission? (tick one) Yes No

If 'Yes' are you directly affected by an effect of the subject matter of this submission that:
(a) adversely affects the environment; and
(b) does not relate to trade competition or the effects of trade competition?
(tick one) Yes No

Remember: Attach this Cover Sheet to as many Content Sheets as required.

**SUBMISSION ON TASMAN RESOURCE MANAGEMENT PLAN – PC66 RICHMOND HOUSING CHOICE**

**TO:** TASMAN DISTRICT COUNCIL

**SUBMISSION ON:** TASMAN RESOURCE MANAGEMENT PLAN – PC66 RICHMOND HOUSING CHOICE

**NAME:** HORTICULTURE NEW ZEALAND

**POSTAL ADDRESS:** PO BOX 10 232  
WELLINGTON

1. **Horticulture New Zealand (HortNZ) submits in support of PC66 Richmond Housing Choice in its entirety.** ①
2. **Background to HortNZ and its RMA involvement**

HortNZ was established on 1 December 2005, combining the New Zealand Vegetable and Potato Growers' and New Zealand Fruitgrowers' and New Zealand Berryfruit Growers Federations.

The horticulture industry value is \$5.6 billion and is broken down as follows:

<b>Industry value</b>	<b>\$5.6bn</b>
Fruit exports	\$2.81bn
Vegetable exports	\$615m
<b>Total exports</b>	<b>\$3.4bn</b>
Fruit domestic	\$960m
Vegetable domestic	\$1.26bn
<b>Total domestic</b>	<b>\$2.2bn</b>

It should be acknowledged that it is not just the economic benefits associated with horticultural production that are important. The rural economy supports rural communities and rural production defines much of the rural landscape. Food production values provide a platform for long term sustainability of communities, through the provision of food security.

On behalf of its 5,500 active grower members HortNZ takes a detailed involvement in resource management planning processes as part of its National Environmental Policies. HortNZ works to raise growers' awareness of the RMA to ensure effective grower involvement under the Act, whether in the planning process or through resource consent applications.

The principles that Horticulture New Zealand considers in assessing the implementation of the Resource Management Act 1991 (RMA) include:

- The effects based purpose of the Resource Management Act
- Non-regulatory methods should be employed by councils
- Regulation should impact fairly on the whole community, make sense in practice and be developed in full consultation with those affected by it
- Early consultation of land users in plan preparation
- Ensuring that RMA plans work in the grower's interests both in an environmental and sustainable economic production sense.

### 3. Horticulture in the Tasman District

There are approximately 202 growing operations in the Tasman District. These include a wide variety of crops as identified in the Census tables below. Tasman is critical in the national food supply framework.

#### *Census Statistics*

The last Agriculture Census was in 2012 and provides a level of insight into the amount of land in horticultural production (Fruit and Vegetables) in the Tasman District. While this data<sup>1</sup> is of interest, it has limitations due the age of the census data (5 years) and the fact that a number of growers requested information they provided to remain confidential. Therefore, this data should not be relied upon to define the full extent of horticulture within the District. It does however highlight the extensive range of fruits and vegetables grown in the Tasman District.

Figures 1, 2a, 2b and 3 below summarise the 2012 census findings for the Tasman District, South Island and New Zealand.

---

<sup>1</sup> [http://www.stats.govt.nz/browse\\_for\\_stats/industry\\_sectors/agriculture-horticulture-forestry/2012-agricultural-census-tables/horticulture.aspx](http://www.stats.govt.nz/browse_for_stats/industry_sectors/agriculture-horticulture-forestry/2012-agricultural-census-tables/horticulture.aspx)

**Figure 1: Area in indoor vegetables harvested by territorial authority and type**  
Year to 30 June 2012

Territorial authority	Capsicum	Cucumber	Cooking herbs	Lettuce/salad greens	Mushrooms (cased)	Tomatoes (Indoor)	All other vegetables and herbs grown indoors
	Square metres						
<b>Tasman District</b>	<b>49,505</b>	<b>C</b>	<b>C</b>	<b>6,514</b>	<b>0</b>	<b>C</b>	<b>C</b>
TOTAL South Island	74,175	53,280	27,450	64,008	C	182,110	87,978
TOTAL New Zealand	571,782	268,525	90,390	238,103	151,962	1,180,883	269,331

Source: Statistics New Zealand

Symbol: C

confidential

**Figure 2a: Area planted in outdoor fruit by territorial authority and type**  
At 30 June 2012

Territorial authority	Kiwifruit (green)	Kiwifruit (gold)	Kiwifruit (other)	Total kiwifruit	Wine grapes	Table grapes	Apples	Pears	Nashi (Asian) pears	Peaches	Apricots	Nectarines	Cherries	Plums	Avocados	Feijoas	Tamarillos	Passionfruit	Persimmons
	Hectares																		
<b>Tasman District</b>	<b>C</b>	<b>C</b>	<b>C</b>	<b>497</b>	<b>821</b>	<b>7</b>	<b>2,496</b>	<b>266</b>	<b>C</b>	<b>3</b>	<b>2</b>	<b>3</b>	<b>C</b>	<b>14</b>	<b>7</b>	<b>10</b>	<b>C</b>	<b>0</b>	<b>1</b>
TOTAL South Island	398	C	C	501	26,613	14	3,224	304	13	95	321	151	595	85	9	36	C	C	1
TOTAL New Zealand	9,500	3,070	187	12,757	34,562	43	8,845	617	76	452	434	409	619	362	4,149	238	106	31	154

Source: Statistics New Zealand

Symbol: C

confidential

**Figure 2b: Area planted in outdoor fruit by territorial authority and type (continued)**

At 30 June 2012

Territorial authority	Hectares															
	Black currants	Blueberries	Boysenberries	Raspberries	Strawberries	Oranges	Grapefruit/ goldfruit	Lemons	Mandarins	Tangelos	Olives	Chestnuts	Hazelnuts	Macadamia	Walnuts	Other fruits
Tasman District	424	27	181	53	3	1	0	C	C	C	129	2	39	C	18	47
TOTAL South Island	1,407	149	221	102	26	1	C	5	C	C	525	41	376	5	477	210
TOTAL New Zealand	1,408	579	259	132	220	696	32	371	691	67	1,657	142	433	195	574	396

Source: Statistics New Zealand

Symbols: C confidential

**Figure 3: Outdoor vegetables harvested by territorial authority and type**

Year to 30 June 2012

Territorial authority	Hectares																	
	Asparagus	Broccoli	Cabbage	Carrots	Cauliflower	Cooking herbs	Green beans	Kumara	Lettuce	Melon (water/ rock)	Onions	Peas (fresh / processed)	Potatoes	Pumpkin	Squash	Sweet corn	Tomatoes (outdoor)	Other
Tasman District	4	96	130	C	120	C	C	C	132	28	55	C	13	62	14	37	4	109
TOTAL South Island	43	429	188	1,189	235	178	741	C	184	28	1,108	4,175	6,136	254	C	894	7	629
TOTAL New Zealand	820	1,977	793	2,047	852	314	1,186	1,228	1,250	273	5,718	6,672	11,578	1,048	6,837	4,664	669	1,781

Source: Statistics New Zealand

Symbols: C confidential

#### 4. Submission

HortNZ is at the forefront of discussion and planning processes around New Zealand that are considering urban intensification and land supply issues to ensure a sustainable response to urban growth pressures.

The Tasman District Council notified PC66: Richmond Housing Choice on 14 October 2017, seeking submissions on the proposed change. This Change proposes to increase the choice of living opportunities in Richmond to allow for:

- (a) *residential intensification in central Richmond in the Richmond Intensive Development Area (RIDA) as shown on the planning maps; and*
- (b) *a change to the compact density provisions for Richmond South and West.*

HortNZ supports PC66 in its entirety and specifically the proposed housing intensification and compact density provisions proposed.

There is a general assumption that New Zealand is the land of plenty and we will always have enough locally-grown food to feed our population, supplemented by imported food where there is demand. But things are changing fast. Prime fruit and vegetable growing land is being squeezed by rapid growth in towns and cities and high demand for new housing. When supply is short and demand high, prices are subject to wide variations. This can potentially put healthy food out of some peoples reach. We need to look closely at our domestic food supply and be sure that planning decision are seen in the context of impacting the whole of New Zealand's food supply.

HortNZ's vision is 'healthy food for all forever'. Now, more than ever, people are seeking out healthy food and lifestyles. Indications from the health sector are that diet is linked to long-term health outcomes. The ideal diet includes plenty of fresh fruit and vegetables. In parallel, there is a perfect storm brewing for New Zealand's supply of healthy food.

HortNZ have made projections around annual food volumes available for consumption in New Zealand<sup>2</sup>. This is based on assumptions that every New Zealander will eat all 10 vegetables – at the same current proportions and at the same rate – across retail, fresh and food services. With New Zealand's population expecting to reach 5,045,000 by 2020 (Based on annual growth between 1.5-2%), domestic food supply will not be able to sustain our future population consumption needs. Our current consumption levels of fresh produce in retail and food service shows that net production is already below what is required for domestic consumption, meaning we can expect food shortages. This further highlights the importance of food security, land production and future-proofing the availability of resources to supply our growing population.

Urban expansion can create wider issues around food production and domestic food supply and the risk of shifting community costs into a new area. The primary issue for HortNZ being the impact of urban sprawl on rural production systems. Access to the land resource is paramount for the horticultural sector. Across the country we are losing the best of a finite resource to urbanisation, including north facing and frost free high production land.

---

<sup>2</sup> New Zealand domestic vegetable production: the growing story. Horticulture New Zealand, 2017

It is the opinion of HortNZ that the impact of poor planning decisions could be catastrophic on the productive capability of nationally significant production land and threaten food security. As identified in Section 3 above, a wide variety of fruits and vegetables are grown in Tasman and this is critical to the National food supply framework.

Therefore, HortNZ support housing intensification for Richmond within the existing urban boundary. This will provide housing choice for Tasman residents in close proximity to amenities, without encroaching on productive rural land.

Please do not hesitate to contact us if you have any queries.

Rachel McClung  
Environmental Policy Advisor – South Island  
Horticulture New Zealand

Dated: 13 November 2017

**Address for service:**

Rachel McClung  
Environmental Policy Advisor – South Island  
Horticulture New Zealand  
PO Box 10-232 WELLINGTON

Mob: 027 582 7474

Email: [rachel.mcclung@hortnz.co.nz](mailto:rachel.mcclung@hortnz.co.nz)



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

Submission on a Change to the Tasman Resource Management Plan (TRMP)

OFFICE USE

Date received stamp:

Initials: Submitter No. 3461

Note: This form is only for the purpose of making a submission on the Plan. It is NOT for making a further submission (i.e. in support or opposition to an original submission) or for making a submission on a resource consent or on Council's Annual Plan.

Submitter Name: Graham Thomas (organisation/individual)

Representative/Contact: Graham Thomas (if different from above)

Postal Address: PO Box 3314 Richmond Nelson 7050

Phone: 0274 915 882 Fax: 03 544 0310 Email: graham@trm.net.nz Date: 15-11-17

Postal address for service of person making submission: (if different from above)

Total number of pages submitted (including this page): 3

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.: 66

Change Title/Subject: RICHMOND HOUSING CHOICE

- I/we wish to be heard in support of my/our submission. I/we would be prepared to consider presenting my/our submission in a joint case with others making a similar submission at any hearings.

Could you gain an advantage in trade competition through this submission? (tick one) Yes No

If 'Yes' are you directly affected by an effect of the subject matter of this submission that:

- (a) adversely affects the environment; and (b) does not relate to trade competition or the effects of trade competition? (tick one) Yes No

1/3

05/16

Remember: Attach this Cover Sheet to as many Content Sheets as required.

Submission on a Change to the Tasman Resource Management Plan

CONTENT SHEET	
Sheet No.	

Please attach the Cover Sheet to your Content Sheet(s) outlining your submission request(s).  
 For each matter of the Plan Change you wish to submit on, please provide the following. Continue on another Content Sheet, if required.

OFFICE USE Submitter Number: 3461

My submission relates to TRMP provision or map numbers:	The aspect of the provisions I support or oppose, together with reasons, are: <i>State the nature of each submission point and indicate whether you:</i> <ul style="list-style-type: none"> <li>• support or oppose the provision or wish to have it amended; and</li> <li>• the reasons for your view</li> </ul>	I seek that Council retain/delete/replace/amend the specific Plan Change provision as follows:	OFFICE USE Submission No.
<b>Example:</b>			
17.5.3.1(ca)(iii)	I oppose the restriction of ... because ...	Delete and replace condition 17.5.3.1(ca)(iii) with:	
Update Map 58/1	<ul style="list-style-type: none"> <li>• I oppose the deletion of No's 43 to 57(A+B) Croucher St from the Richmond Intensive Development Area as shown on Update Map 58/1 and other plans (Fig 6.8 B, etc.).</li> <li>• Deletion of that row of houses fronting Croucher St creates a disjointed street frontage for half of the length of the street.</li> <li>• Deletion of that row of houses is also contrary to Section F (Frontages) of the Urban Design Guide (Part II Appendix 2).</li> </ul>	<ul style="list-style-type: none"> <li>• Alter the boundary of the "Richmond Intensive Development Area" (Update Map 58/1) as shown on the attached plan "Submission on PC 66".</li> <li>• Alter any other sections of PC 66 as required.</li> </ul>	<p>①</p> <p>②</p>

3777 Holthouse Communications

2/3

Pg 2/2

Feel free to contact us:



Tasman District Council  
 Email info@tasman.govt.nz  
 Website www.tasman.govt.nz  
 24 hour assistance

Richmond  
 189 Queen Street  
 Private Bag 4  
 Richmond 7050  
 New Zealand  
 Phone 03 543 8400  
 Fax 03 543 9524

Murchison  
 92 Fairfax Street  
 Murchison 7007  
 New Zealand  
 Phone 03 523 1013  
 Fax 03 523 1012

Motueka  
 7 Hickmott Place  
 PO Box 123  
 Motueka 7143  
 New Zealand  
 Phone 03 528 2022  
 Fax 03 528 9751

Takaka  
 14 Junction Street  
 PO Box 74  
 Takaka 7142  
 New Zealand  
 Phone 03 525 0020  
 Fax 03 525 9972

SCANNED



Richmond Intensive Development Area

Richmond Intensive Development Area

Nos 43 to 57 (and) CROUCHER ST TO BE INCLUDED IN PC 66

**SUBMISSION ON P.C. 66**



**TASMAN RESOURCE MANAGEMENT PLAN**  
**Plan Change 66**  
**Proposed**

**Legend**

Richmond Intensive Development Area

**ZONES**

**Update Map 58/1**  
**14 October 2017**

Maps affected: 23, 57, 124, 125, 129, 130

Sourced from Land Information New Zealand data. Crown Copyright reserved. Original paper size is A3.

