



Tasman Resource Management Plan

Growth Plan Change 76 – Wakefield

Notified: 16 September 2022

Original Submissions Received: October 2022

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

Note:

1. 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.
2. It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, contact details, etc.
3. **Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e. Council makes a decision to refuse, amend or accept the changes). Please include specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.**

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

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Date received stamp:

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Submitter No. _____

Submitter Name: _____

(organisation/individual)

Representative/Contact: _____

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Postal Address:

Phone: _____

Fax: _____

Email: _____

Date: _____

Postal address for service of person making submission:

(if different from above)

Total number of pages submitted *(including this page)*: _____

Signed: _____

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:

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

05/19

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

Submission to TDC on TRMP Wakefield Change No 76

I largely support the plan change shown in Update Map 76/1 and approve of the reserve status of the grove of mature trees shown on the map. I am pleased that the reserve status extends across the Pitfure Stream.

At this point, the Pitfure Stream drains over 11 sq km of farmland and can flow at large volumes. Planting a wide riparian strip with Flax and other natives will improve detention, aquifer recharge and lessen the impact of peak flows downstream.

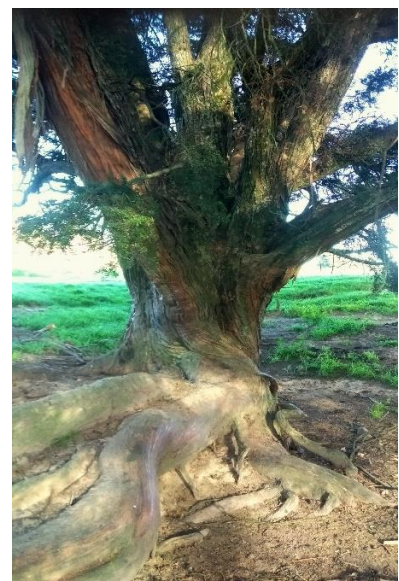
The whole area can make a good ecological reserve and is much loved by locals who regularly walk and run the cycle track.

Amendment: The council should consider that the cycle track to Edwards Rd itself deserves consideration of amenity space and planting beside it. Locals and tourists alike would be saddened to see housing right across this parkland area to the edge of the trail. This section from Higgins Rd to Edwards Rd is certainly a highlight of the Great Taste Trail, much of which is routed beside the road from Brightwater.

Suggested Amendments

There is an isolated Totara in the paddock, circled in red on the following map and shown in the photo below. This tree has a girth of over 4m and is over three hundred years old. It should be given preservation status.

It would add value to the housing development and, if included as part of a children's play area, would improve the landscape values and amenities of the area. (Policy 6.1.3.1).



Another large tree, an oak, circled in yellow, is shown on the plan as an isolated 'reserve' tree with a pathway to it. I would strongly recommend that the hawthorn hedge between that tree and the cycleway is also preserved. The hawthorn adds to diversity, is not a noxious plant and many birds feed and nest there. This area is home to many native birds, including the Tui, Kingfisher, Shining Cuckoo, NZ falcon and owls.

In setting aside this area and trees the council is giving substance to Policy 6.1.3.1 a. b. c. h and l.



Ref to Methods of Mitigation 6.2.20.2 d and e. (TRMP - contain urban development away from land with a moderate to high risk of natural hazard.)

Amendment suggested.



Adjacent to Edwards St, the area to the Southeast of the Cycleway is included in the area to be developed. In this area, housing footprints should be limited to be exclusively beside the existing road, Edwards St.

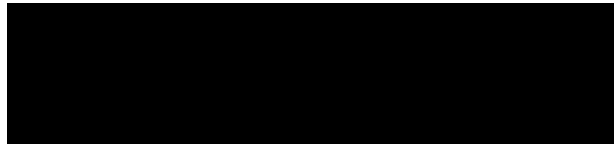
The reason being that Jenkin’s Creek, Pitfure Stream and the creek from Gossey Drive surround and cross this paddock. These streams drain many square kms of land and during the torrential localised downpours that we experience, the lower part of the paddock is regularly inundated.

Relevant part of Fig 5 from 2.2.5 of Section 32 Evaluation Report.

Torrential weather patterns are increasing with climate change and we need to make space for our waterways. Having lived beside the Pitfure for the last 25 yrs, I am familiar with the problem!

From: neil kitchen [REDACTED]
Sent: Monday, 17 October 2022 10:01 pm
To: Tasmanrmp
Subject: Change 76 growth Wakefield.

Good eve team
No computer so submitting on phone.
Neil kitchen



Re the above.

I request you reconsider the proposal.

I am not averse to the development per se.

However i have some serious concerns in its current form.

1. I can find no evidence of consultation with NZ transport agency. This proposal effectively allows 495 sections of various sizes.potentially almost 1000 extra cars at 2 per household. Home owners need vehicle access in wakefield due to lack of proper public transport and most work in either richmond ornelson.i can only see two exits onto pitfure road. Where then for the traffic..pitfure road junction with Whitby road..a junction i use every day and is already a diffucult ceossong to travers sh6 turning right. Combine that extra volume of traffic exiting Martin Ave from the george fife development and you are creating an incredibly dangerous vehicle pinch point at crucial times.its also a major school bus route at the same time.with intermediate and college students being picked up and wakefield school kids walking to school.

2. There appears to now be an exit from the new development into Edward Street. I do not recall this being on the original plans..please advise where i can see that in approved plans. When earthworks were being done they appeared to stop short of Edward street with an afterthought putting in a connection . Once the Gossey park north development is complete and joins up to Kilkenny place et al this will in effect create a short cut rat run for those houses to access Wakefield and beyond adding potentially even more pressure to Pirfure road. The rat run also crosses a National cycleway!!!!where cyclists are obliged to CROSS edward Street at this very point.

3. The only reason i can see you have provided for not upgrading Higgins Road

As an alternative is one of cost..surely this should be considered as an early sensible option. With upgrades and a roundabout at junction sh6 and Bird Road.

4. There is a strip of land at the end of pitfure road from the new development.could this be a road exit from the subdivison. ? With provosion of a roundabout junction Pitfure road and whitby road to assist with conjestion and traffic flow. Roundabouts are very effective traffic calming

Alternatives.

In its current form this plan appears to tick plenty council boxes while leaving the residents of Wakefield to suffer and sort out a huge traffic problem which can be foreseen and will undoubtably lead to road crashes and possibly fatalities.

I.look forward to your response regarding the solutions to these clear and obvious issues.

Regards

Neil kitchen.



Waka Kotahi NZ Transport Agency Reference: 2022-1437

17 October 2022

Tasman District Council
189 Queen Street,
Private Bag 4,
Richmond, 7050

Via email: tasmanrmp@tasman.govt.nz

To whom it may concern,

Submission on Tasman District Council Proposed Plan Change 76 – Wakefield

Attached is the Waka Kotahi NZ Transport Agency submission on Tasman District Council's Proposed Plan Change 76 for Wakefield.

We welcome the opportunity to discuss the contents of our submission with the Council as required.

If you have any questions, please contact me.

Yours sincerely

A handwritten signature in blue ink, appearing to read 'Lea O'Sullivan', with a flourish at the end.

Lea O'Sullivan
Principal Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services

Phone: 021 220 8608

Email: Lea.O'Sullivan@nzta.govt.nz

FORM 5, CLAUSE 6 OF SCHEDULE 1, RESOURCE MANAGEMENT ACT 1991

Submission on Tasman District Council Proposed Plan Change 76 – Wakefield

To: Tasman District Council
189 Queen Street,
Private Bag 4,
Richmond, 7050

Via email: tasmanrmp@tasman.govt.nz

From: Waka Kotahi NZ Transport Agency
55 Collingwood Street
Nelson 7010

1. This is a submission on the following:

This is submission on Tasman District Council's (Council) Proposed Growth Plan Change 76 Wakefield (the plan change) which seeks the inclusion of the Wakefield Development Area to deferred residential, including the application of the existing compact density provisions to this area.

2. Waka Kotahi NZ Transport Agency (Waka Kotahi) could not gain an advantage in trade competition through this submission.

3. Role of Waka Kotahi

Waka Kotahi is a Crown entity with its functions, powers and responsibilities set out in the Land Transport Management Act 2003 (LTMA) and the Government Rounding Powers Act 1989. The primary objective of Waka Kotahi under Section 94 of the LTMA is to contribute to an effective, efficient, and safe land transport system in the public interest.

An integrated approach to transport planning, funding and delivery is taken by Waka Kotahi. This includes investment in public transport, walking and cycling, local roads and the construction and operation of state highways.

Waka Kotahi interest in this proposal stems from its role as:

- A transport investor to maximise effective, efficient, and strategic returns for New Zealand.
- A planner of the land transport network to integrate one effective and resilient network for customers.
- Provider of access to and use of the land transport system to shape smart efficient, safe, and responsible transport choices.
- The manager of the State Highway system and its responsibility to deliver efficient, safe, and responsible highway solutions for customers.

4. Government Policy Statement on Land Transport

Waka Kotahi also has a role in giving effect to the Government Policy Statement on Land Transport (GPS). The GPS is required under the LTMA and outlines the Government's strategy to guide land transport investment over the next 10 years. The four strategic priorities of the GPS 2021 are safety, better travel options, climate change and improving freight connections. A key theme of the GPS is integrating land use, transport planning and delivery. Land use planning has a significant impact on transport policy, infrastructure, and services provision, and vice versa. Once development has happened, it has a long-term impact on transport. Changes in land use can affect the demand for travel, creating both pressures and opportunities for investment in transport infrastructure and services, or for demand management. For these reasons, Waka Kotahi seeks full utilisation of the tools available to Council to enable development in the most accessible urban areas.

To deliver on the outcomes set by the GPS, Waka Kotahi have developed several strategies. A summary below is provided of those strategies relevant to this plan change; Arataki and Toitū Te Taiao.

- Arataki¹ is Waka Kotahi ten-year view on the step changes and actions needed to deliver long-term outcomes for the land transport system. It includes a national view as well as a regional view for the Top of the South (Nelson, Tasman, and Marlborough). For Nelson, the identified 'key insights' include:
 - The urban environment is forecast to receive the majority of population growth in the Top of the South. This growth, combined with forecast increases in freight transport is placing the Nelson urban area transport system under increasing strain, especially the corridor through Richmond and into Nelson.
 - A high proportion of journeys to work are by private vehicle. The Nelson urban area has the highest share of people walking and cycling in the country, and public transport use has doubled in the past five years.
 - Coastal communities and transport networks will be impacted by more severe weather patterns, particularly in coastal and hill areas. This is expected to be increasingly impacted by climate change, storms, and sea level rise. Seismic risks associated with the Alpine, Waimea and Wairau faults are also significant.
 - The safety record for the Top of the South is particularly poor in the urban areas, at intersections and involving cyclists, and in Nelson involving older road users.
- Toitū Te Taiao² is Waka Kotahi sustainability action plan. This seeks to address the strategic challenges of reducing greenhouse gas emissions and improving public health. This strategy identifies an "Avoid Shift Improve" framework which includes:
 - Avoid: reducing the need to travel and/or the time or distance travelled by car, while improving or maintaining accessibility,
 - Shift: changing how we move e.g., shifting from cars to lower-emission types of travel (e.g., public transport, cycling and walking)
 - Improve: improving the emissions efficiency and the use of low-carbon fuels

¹ <https://www.nzta.govt.nz/assets/planning-and-investment/arataki/docs/regional-summary-top-of-south-august-2020.pdf>

² <https://www.nzta.govt.nz/about-us/about-waka-kotahi-nz-transport-agency/environmental-and-social-responsibility/toitu-te-taiao-our-sustainability-action-plan/>

5. Nelson Tasman Future Development Strategy 2022 – 2052

The Nelson Tasman Future Development Strategy (NTFDS) came into effect on 19 September 2022 which plans for growth across Nelson and Tasman over the next thirty years. The strategy provides capacity for 25,000 houses through intensification, greenfield, and rural-residential development.

The feedback provided by Waka Kotahi in the formal submission was largely supportive of the integrated and long-term approach to planning, and the general direction of the NTFDS. Feedback provided included:

- The NTFDS did not include timeframes for staging of the development areas identified, indications of staging support Waka Kotahi to better align investment decisions to support growth. Greenfield development needs to be timed appropriately, staged, with priority given to high density residential housing close to existing urban areas and the associated infrastructure and services; and
- Provision of infrastructure to support safe transport modes for all modes is critical. Waka Kotahi supports the provision of a multi-modal transport network within development areas and linking to nearby services and infrastructure and open space / recreation areas that provides for community cohesion, connectivity and resilience. Plan changes should provide information on how greenhouse gas emissions could be reduced through enabling active and public transport modes; and
- Reverse sensitivity provisions being included; and
- Plan changes should be informed by an assessment on the potential impacts of the wider transport network – such as an Integrated Transport Assessment, which looks at the coordination of land use planning and transport in and around new development.

6. State highway environment and context

State Highway 6 (SH6) in this area is considered an arterial route under the One Road Network Classification. Part of SH6 is a limited access road under the Government Rounding Powers Act 1989 (eastward from the intersection with Pitfure Road), with an Average Annual Traffic Count of 8,624 vehicles per day, with 15% of those being heavy vehicles. The posted speed limit is 50km/hr and the topography is generally flat.

The intersection of SH6 and Pitfure Road is give way controlled with slip-lanes and is not to a suitable standard to accommodate the additional vehicle movements generated by the plan change. The operating speed is high, particularly with vehicles turning left onto Pitfure Road. Improvements for all road users would be required to support the development enabled by the plan change.

7. The specific provisions of the proposal that this submission relates to are:

Although the Wakefield development would lead to significant effects on the local road network linking Wakefield to the town centre and other nearby services, the Waka Kotahi submission focuses on the state highway effects with the purpose of ensuring that the Waka Kotahi roading assets are not adversely affected by the plan change, and that the Waka Kotahi strategic outcomes can be met.

8. The submission of Waka Kotahi is:

- (i) Waka Kotahi supports in part the plan changes to add Wakefield development area to the extent outlined in this submission, noting that more information is required to manage the effects on the Pitfure Road and State Highway 6 intersection.

Intersection State Highway 6 and Pitfure Road

- (ii) Waka Kotahi supports the plan change, subject to further detail and management on effects on the intersection with State Highway 6. The vehicle road links to Ryeland, Pitfure, and Edward Road. Additional traffic onto State Highway 6 intersection with Pitfure Road should be considered, specifically to slow the speed of vehicles travelling from SH6 to Pitfure Road due to the pedestrian and cycle connections proposed, to ensure safe travel for active modes. Safety improvements may be required which is identified in the section 32 report, but there is no further detail on any upgrades proposed or the timing of the required changes. Effects of active transport and additional vehicle movements on the wider network within Wakefield need to be explored at resource consent stage. The plan change will enable a significant increase in users of the transport network. Waka Kotahi recommends that the plan is revised to include a trigger for an Integrated Transport Assessment at resource consent stage that assesses the impacts on all transport modes at the intersection with the state highway and ensure safe provision for active transport users throughout Wakefield. This assessment would also inform what upgrades would be most appropriate at the intersection and across the network. Waka Kotahi supports the plan change subject to further assessment on effects at the intersection at resource consent stage, and requests involvement in further conversations about this intersection.

Multi-modal connectivity:

- (iii) Waka Kotahi supports the provision of a multi-modal transport network within the Wakefield development area and linking it to nearby services and infrastructure. Waka Kotahi also supports the open space /recreation areas that provide for community cohesion, connectivity, and resilience. Prioritisation of safe and strategic active mode connectivity within the plan change area and Wakefield should be prioritised.
- (iv) The Council Walking and Cycling Strategy includes connections from the plan change area to the town centre and the wider region. Waka Kotahi supports the plan change alignment with this strategy, providing for multi-modal connections for residents in the plan change area.

Alignment with the NTFDS:

- (v) Waka Kotahi generally considers that the location is suitable for greenfield development as it is an extension of the existing urban area (Wakefield) and close to existing infrastructure including schools and businesses. Active transport links and planned public transport improvements to provide multi-modal connectivity are supported, subject to improvements at the intersection of SH6 and Pitfure Road in addition to any other improvements to enable safe transport connections.
- (vi) The full extent of the proposed development area was not in the NTFDS. Additional area is proposed to be added to T-107. Waka Kotahi seeks to understand the implications on the additional greenfield area planned in the NTFDS (T-194). Waka Kotahi prefers the Plan Change 76 addition to development of T-194 as this area predominantly uses local road connections, and is within a walkable catchment of the town centre. Waka Kotahi supports this but considers that an assessment should be undertaken by the Council to determine whether T-107 is sufficient to meet demand and consider removing or reducing other planned greenfield areas such as T-194 as appropriate.
- (vii) Although the development area is not fully earmarked within the NTFDS, Waka Kotahi consider that it generally aligns with the strategy and support this subject to detail on staging. Wakefield was identified in the NTFDS as a suitable area for growth, and that growth should be supported by infrastructure, public transport, and active transport upgrades. In addition, the NTFDS identified that the Council would need to encourage the development of a broader range of services in the Wakefield centre to encourage more local trips. Waka Kotahi supports the continued strategic planning of the Wakefield area to support additional densities earmarked in the NTFDS and that form part of this plan change.

- (viii) Waka Kotahi supports the inclusion of the compact density provisions and enabling housing choice within the Wakefield Development Area, particularly given that it is located a walkable distance (maximum 1600m) from the town centre. The area also connects with the Tasman Great Taste Cycle Trail which provides a predominately off-road cycle trail to Brightwater, Richmond and beyond. There is also a bus route which stops on Pitfure Road outside the development area and Council proposes to extend this route to include a stop within the development area as well as provide an additional route. Waka Kotahi supports these initiatives to provide for residential intensification and strategically locate greenfield development and connect the area with existing active and public transport services.

Deferred zoning:

- (ix) As part of the plan change, the zoning of the land is deferred and will not be lifted until Council is satisfied with the stormwater and catchment management. Waka Kotahi supports this approach with an amendment that the zoning also be deferred until Council and Waka Kotahi are both satisfied with the transport related effects to the network – particularly at the intersection of SH6 and Pitfure Road. Intensification enabled by the plan change should be deferred until such time that the intersection has been upgraded to safely support the transport network users.

The application of 'walkable and cycling distance'

- (x) Waka Kotahi seek clarification as to where the 'cycling' distance component of 'walking and cycling distance' has arisen from. Cycling distances/catchment areas are very different compared to walking. We are supportive of the walking catchment to the Wakefield town centre. We are also supportive of provisions enabling a walking and cycling connection to potential bus stop locations.

Terminology - higher densities:

- (xi) The proposed revisions in the plan change require 'higher density'. Waka Kotahi supports the direction and intent of the plan change, to promote increased density within the Wakefield Development Area. Waka Kotahi considers that the terminology 'higher density' may be confused for 'high density' and propose revised wording or clarification to minimise confusion while still achieving the intended direction. Waka Kotahi supports the plan change, subject to the revisions in Table 1, and clarification on the terminology 'higher density/ies' being included.

9. Waka Kotahi seeks the following decision from the Local Authority:

- (i) The changes sought as outlined in our above submission points and in Table 1 below are made.
- (ii) A requirement for an Integrated Traffic Assessment (ITA) at the resource consent stage to determine the effects of increased traffic (via active and private transport modes) onto the network – particularly at the intersection with Pitfure Road and SH6. Residential zoning should be deferred to such time as appropriate upgrades to the intersection and its surrounds informed by the ITA are undertaken.
- (iii) Proposed terminology 'higher densities' is clarified.
- (iv) Provide clarification on how the plan change impacts the staging and requirements for other greenfield development in Wakefield.
- (v) Subject to the changes sought, Waka Kotahi is in support of the plan change.

10. Waka Kotahi does wish to be heard in support of this submission.
11. If others make a similar submission, Waka Kotahi will consider presenting a joint case with them at the hearing.
12. Waka Kotahi is willing to work with the Tasman District Council in advance of a hearing.



Principal Planner – Poutiaki Taiao / Environmental Planning
System Design, Transport Services
Pursuant to an authority delegated by Waka Kotahi NZ Transport Agency

Date: 17 October 2022

Address for service: Waka Kotahi NZ Transport Agency
55 Collingwood Street
Nelson 7010

Contact Person: Lea O'Sullivan
Telephone Number: 021 220 8608
E-mail: Lea.OSullivan@nzta.govt.nz.
Alternate Email: EnvironmentalPlanning@nzta.govt.nz

Table 1: Waka Kotahi submission points

Point #	Topic	Plan Provision	Support/Support in Part Oppose	Reason for Comment	Change(s) sought
1	Defined words	Chapter 2 2.2	Support	Support the definition of Wakefield Development Area as it clearly defines the area.	Retain as notified
2	Site Amenity Effects	Chapter 5 5.3.30	Support	Support the addition of <i>enabling medium density development in specified Development Areas, reflects the need to use land more efficiently where expansion does occur</i> as it aligns with the NTFDS.	Retain as notified
6	Urban Environment Effects	Chapter 6 6.1.3.1B	Support	Support the inclusion of this policy to align with the urban design guide as it specifies good design requirements for liveable communities.	Retain as notified
7	Land Effects from Urban Growth	Chapter 6 6.2.3.2	Support	Support the wording for enabling smaller residential lot sizes in Wakefield as it is in line with the NTFDS and growth near the town centre.	Retain as notified
8	Land Effects from Urban Growth	Chapter 6 6.2.3.2A	Support	Support the inclusion of Wakefield in this policy to encourage medium density development in this area.	Retain as notified
9	Land Effects from Urban Growth	Chapter 6 6.2.3.2B	Support in part	Support the policy for enabling higher density housing options but the word 'higher' could be confused with high density housing. Therefore, Waka Kotahi consider different wording should be used for clarity, such as variety of lot sizes and housing typologies'.	Amend wording as follows: 6.2.3.2B To ensure efficient land use in the Wakefield Development Area by requiring subdivisions that result in a variety of <u>housing typologies</u> and lot sizes including higher density options.
10	Land Effects from Urban Growth	Chapter 6 6.2.20.1 (a) and (b)	Support	Wording in line with the NTFDS purpose as the area should be up zoned to the fullest extent possible to provide for local services for people who will be living in the walkable catchments. Enabling additional densities in these areas will also support provision of public transport and active transport infrastructure in the future by concentrating population	Retain as notified

11	Land Effects from Urban Growth	Chapter 6 6.2.20.1 (ba)	Support	This is in line with the NTFDS purpose as the area should be up zoned to the fullest extent possible to provide for local services for people who will be living in the walkable catchments. Enabling additional densities in these areas will also support provision of public transport and active transport infrastructure in the future by concentrating population	Retain as notified
12	Land Effects from Urban Growth	Chapter 6 6.2.30	Support in part	Support the inclusion of Wakefield. However, Waka Kotahi seeks clarification as to where the 'cycling' distance component of 'walking and cycling distance' has arisen from. Cycling distances/catchment areas are very different compared to walking.	Clarification on 'cycling' being included as the same as walking distance
13	Land Effects from Urban Growth	Chapter 6 6.8.30	Support	Support the inclusion of Figure 6.8A to show the range of housing provided in the Wakefield Development Area.	Retain as notified
14	Wakefield	Chapter 6 6.17.1.6A	Support in part	Support the intent but the word 'higher' could be confused with high density housing. Therefore, Waka Kotahi consider different wording should be used for clarity, or higher density is clarified.	Change 'higher density' or clarify.
15	Wakefield	Chapter 6 6.17.3.7A and 6.17.3.7B	Support in part	Support intent of policies – these should be combined for clarity due to the similarity in wording. Also, Waka Kotahi considers the word 'higher' could be confused with high density housing and considers different wording should be used for clarity, or higher density is clarified.	Combine both policies and amend wording as follows: To require a variety of lot sizes <u>and housing typologies including higher density housing options</u> on land within the Wakefield Development Area between Pitfure Road, Edward Street, and Higgins Road, which: a) achieves a high standard of residential amenity through design in accordance with the Urban Design Guide (Part II, Appendix 2); and b) through the use of a mandatory mix of lot sizes and encourage Compact Density Development through the use of a non-notification provision

16	Wakefield	Chapter 6 6.17.3.12	Support	Support the intent of the policy which promotes efficient use of land.	Retain as notified.
17	Wakefield	Chapter 6 6.17.20.1(d)	Support in part	Support the intent of the methods, however Waka Kotahi considers the word 'higher' could be confused with high density housing. Therefore, Waka Kotahi consider different wording should be used for clarity, or higher density is clarified.	Change 'higher density' or clarify.
18	General Rules	Chapter 16.3 Subdivision 16.3.3.1 (a)	Support	In line with the NTFDS	Retain as notified
19	General Rules	Chapter 16.3 Principal Reasons for rules 16.3.20	Support in part	Wakefield Development Area explanation for non-notification refers to Brightwater in error. This should be revised.	Change 'Brightwater' to 'Wakefield' as follows: non-notification (both public (s95A) and limited (s95B)) of Compact Density Development within the Brightwater Wakefield Development Area applies. This responds to the objectives and policies in the Tasman Resource Management Plan.
20	Zone Rules	Chapter 17	Support in part	As part of the plan change, the zoning of the land is deferred and will not be lifted until Council is satisfied with stormwater and catchment management. Waka Kotahi submits that it also be deferred until Council and Waka Kotahi are both satisfied with the transport related effects – particularly the intersection of SH6 and Pitfure Road	Also defer until Council and Waka Kotahi are both satisfied with the transport related effects – particularly the intersection of SH6 and Pitfure Road
21	Urban Design	Part 11- Appendix 2 Urban Design Guideline	Support	Support the inclusion of Wakefield and the provisions or a variety of lot sizes, increased density, and a quality living environment.	Retain as notified

From: CARMODY, Peter <Peter.Carmody@police.govt.nz>
Sent: Friday, 14 October 2022 3:07 pm
To: Tasmanrmp
Cc: CARMODY, Peter
Subject: Proposed Pland Change 76: Wakefield-Residential Growth
Attachments: Document_2022-10-14_14-55-04-303_pce485.pdf

Hi

Pleased find attached my Submission which shows I would like to appear in person and speak with the 'Homes for Wakefield Group'

Kind Regards
Peter Carmody

=====
WARNING

The information contained in this email message is intended for the addressee only and may contain privileged information. It may also be subject to the provisions of section 50 of the Policing Act 2008, which creates an offence to have unlawful possession of Police property. If you are not the intended recipient of this message or have received this message in error, you must not peruse, use, distribute or copy this message or any of its contents. Also note, the views expressed in this message may not necessarily reflect those of the New Zealand Police. If you have received this message in error, please email or telephone the sender immediately

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

Return your submission by the advertised closing date to:

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Tasman District Council
Private Bag 4, Richmond 7050 OR
189 Queen Street, Richmond OR
Fax 03 543 9524 OR
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Date received stamp:

Initials: _____

Submitter No. _____

Submitter Name: Peter Carmody

(organisation/individual)

Representative/Contact:

(if different from above)

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7A McCrae Street
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7025

Phone: 027 27 44 911

Fax:

Email: Carmodyfamily@xtra.co.nz

Date: 14/10/2022

Postal address for service of person making submission:

(if different from above)

Total number of pages submitted (including this page):

Signed:



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.: 76

Change Title/Subject: Homes for Wakefield

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.

05/19

Submission on a Change to the Tasman Resource Management Plan

CONTENT SHEET

Continue on another Content Sheet, if required, and then attach the Cover Sheet to all Content Sheets.

Sheet No. 2 of 2

OFFICE USE Submitter Number:

The **whole** Plan Change (Please tick as applicable)

- I **support** the Plan Change and seek that the Council **retains** it in its entirety.
 I **oppose** the Plan Change and seek that the Council **deletes** it in its entirety.
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---	--	--

Example:

17.5.3.1(ca)(iii)	I oppose the restriction of ... because ...	Delete and replace condition 17.5.3.1(ca)(iii) with:
2.2.4 3.1 Page 13	<p>With a planned 495 dwelling subdivision I am concerned about the number of vehicles that would exit Pitfure Road onto SH6/Whitby Road given the present layout of the intersection. There is restricted visibility due to the angle that traffic entering SH6 from Pitfure Road are faced with. There is also the added traffic that will be coming from the George Fyfe subdivision as there is only one way in and one way out. This could be alleviated by allowing traffic to exit that subdivision via Bird Lane which ideally would come to SH6 then a roundabout to allow egress.</p> <p>There is no correspondence from Waka Kotahi that I can see to address these concerns. That information would need to show that these matters would be resolved prior to the subdivision being finalised.</p> <p>In very recent times council was advised by Waka Kotahi not to go ahead with the Richmond Berryfield Subdivision due to no additional roading infrastructure planned to cater for the large increase in traffic movements and one only has to see the result of that remiss on Councils behalf.</p> <p>The extra traffic that would be on Edward Street turning left or right into having come from Edward Street East which is forecast to take traffic from the Totaradale Subdivision via Gossey Rd North and the new road (yet to be named) from the Pitfure subdivision and also the extra two senior classes that are to be added to the Wakefield school.</p> <p>Even today without the subdivisions fully operational there is a 'snarl up' at the southern end of Pitfure Road only metres away from Edward Street as there is always vehicles parked on the western side of Pitfure Road facing north virtually taking it down to one lane near the intersection.</p>	

OFFICE USE:
Submission No.



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New Zealand
Phone 03 528 2022
Fax 03 528 9751

Takaka
78 Commercial Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

From: lesley.chris <lesley.chris@kinect.co.nz>
Sent: Sunday, 16 October 2022 10:05 pm
To: Tasmanrmp
Subject: Submission for change 76 growth wakefield

To whom it may concern

As a concerned Pitfure Rd resident we have been made aware of the changes that have been made to the Pitfure Rd subdivision in regards to the amount of sections that will be for sale in the future.

Our concern is that if there is 490 plus sections then there is the likely hood of another 1000 vehicles possibly using Pitfure Rd. This is already a busy road being used by large truck and trailer units along with many residents using Pitfure Rd for parking on both sides of the road creating one way traffic in multiple sections and we believe that this will make Pitfure Rd unsafe for residents. It will also make entering State Highway 6 at the bottom of Pitfure Rd dangerous and an accident in the making.

We would like to know what NZTA's plans are for traffic management on Pitfure Road and at the intersection of Pitfure and State Highway 6

Kind Regards

Chris and Lesley Olaman
Residents of Pitfure Road

Sent from my Galaxy

From: Homes for Wakefield <homesforwakefield@gmail.com>
Sent: Friday, 14 October 2022 1:38 pm
To: Tasmanrmp
Subject: submission to Change 76: Growth - Wakefield
Attachments: Plan Change 76 Homes for Wakefield content page 2.pdf; Plan Change 76 Homes for Wakefield cover page.pdf; TRMP Submission Form 3 - Content Sheet (2).pdf

Good afternoon

On behalf of Homes for Wakefield I am sending in our submission for the Change 76: Growth - Wakefield on behalf of our "Homes for Wakefield" group. There are 4 pages to our submission: our email, one cover sheet and two pages of content.

As Homes for Wakefield Group we are a subgroup of the Wakefield Community Council. We are a group of people representing the Wakefield community and we request more than 10mins speaking time and also to allow question time.

Thank you for providing a form for content, however it is not user friendly and is difficult to save with text. When writing in the form it is impossible to get the columns to align.

This Plan Change and development would affect major changes to our village. We believe it is really important that TDC holds public meetings to carefully inform people about these proposals before they are confirmed.

We are unhappy with the short notice about the Council presentation of the Plan Change at the September Wakefield Community Council Meeting. It did not allow sufficient time for the public to be involved and understand the long term implications of the proposals. However we do support the majority of the Plan Change, we want to state the process should have been better.

Kind regards

Sonja Lamers

Committee Member
Homes for Wakefield, Wakefield Community Council

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

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

OFFICE USE

Date received stamp:

Initials: _____

Submitter No. _____

Note:

1. 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.
2. It is not mandatory to use either the cover or content sheet of this form, however your submission must be in writing and provide the necessary information as indicated on the form, e.g., what is supported or opposed, the reason why and the decision sought, contact details, etc.
3. **Council cannot accept a submission that does not clearly indicate what a submitter wishes Council to do (i.e. Council makes a decision to refuse, amend or accept the changes). Please include specific recommendations if amendments are sought. Council also cannot accept a submission that does not relate specifically to the Plan Change. In these cases, the submission may be considered 'Out of Scope' and may not be considered further.**

Submitter Name: _____

(organisation/individual)

Representative/Contact: _____

(if different from above)

Postal Address:

Phone: _____

Fax: _____

Email: _____

Date: _____

Postal address for service of person making submission:

(if different from above)

Total number of pages submitted *(including this page)*: _____

Signed: _____

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:

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

Submission on a Change to the Tasman Resource Management Plan

CONTENT SHEET

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Example:

17.5.3.1(ca)(iii)	I oppose the restriction of ... because ...	Delete and replace condition 17.5.3.1(ca)(iii) with:
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OFFICE USE:
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Submission on a Change to the Tasman Resource Management Plan

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COVER SHEET

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Submitter Name: Daniel & Katherine McKay
(organisation/individual)

Representative/Contact: _____
(if different from above)

Postal Address:
66 Pitfure Road
Wakefield

Phone: 0275204603

Fax: _____

Email: danielkatym@yahoo.co.nz

Date: 17/10/2022

Total number of pages submitted (including this page): 2

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

Signed: KMcKay
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.: 76

Change Title/Subject: Wakefield - Residential Growth

- I/we wish to be heard in support of my/our submission.
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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:

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Example:

17.5.3.1(ca)(iii)	I oppose the restriction of ... because ...	Delete and replace condition 17.5.3.1(ca)(iii) with:
2.2.25 Figure 5	<p>We object the road as it is very close to the back of our property. The first plan we saw in an local paper showed the road alot futher back from our property as well as housing alot futher back.</p> <p>Our privacy would be affected as well as noise.</p> <p>There is also a stream running behind our property which is not shown on the map, it runs all year round as a spring. Would this be filled in?</p> <p>How will this affect our boundary and will we have to bear the cost of building a sufficient fence to ensure we have privacy and noise reduction.</p> <p>In the document it is said that a letter to adjoining land owners was sent in November 2021, if we are considered part of that area, we did not receive any letter.</p>	Change road and show stream.

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Submission on a Change to the Tasman Resource Management Plan

Environmental Policy
Tasman District Council
Email: tasmanrmp@tasman.govt.nz

Submitter # 4211

Received 14.10.22

Plan Change 76 Tasman Resource Management Plan

Submitter Details

Full Name Wakefield Village Developments Limited
Postal Address C/- Landmark Lile Limited, PO Box 343, Nelson
Mobile Phone 027-244-3388
Email mark@landmarklile.co.nz

Council Hearing

Wakefield Village Developments Ltd does wish to be heard in support of its submission.

Wakefield Village Developments Ltd is not prepared to consider presenting its submission in a joint case with others.

Trade Competition

Wakefield Village Developments Ltd could not gain an advantage in trade competition through this submission.

Signature of Submitter  Date: 17 October 2022

The specific provisions of the Plan Change 76 that this submission relates to are as follows:

This submission relates to each of the proposed changes to the Tasman Resource Management Plan, as set out in PC76, and as listed in table format below.

Chapter 2: Meaning of Words	
Provision	
2.2	<u>Nature and Reasons for submission</u> The change to the definition of “Compact density development” to include “Wakefield” is supported. This change is a necessary and important part of PC76. <u>Relief Sought</u> Retain change as proposed.
2.2	<u>Nature and Reasons for submission</u> The change to the definition of “Urban Design Guide (Part II, Appendix 2)” to include “Wakefield” is supported. This change is a necessary and important part of PC76. <u>Relief Sought</u> Retain change as proposed.
2.2	<u>Nature and Reasons for submission</u> The inclusion of a definition of “Wakefield Development Area” is supported. This change is a necessary and important part of PC76. <u>Relief Sought</u> Retain change as proposed.

Chapter 5: Site Amenity Effects

Provision	
5.3.30	<p><u>Nature and Reasons for submission</u></p> <p>The changes proposed to the 'Principal Reasons and Explanations' in 5.3.30 are intended to provide support to the <i>enablement</i> of medium density development, with the benefit of efficient land use and also to reduce the loss of high productive land and natural character values. It is however considered that this explanation does not entirely reflect that the rules go beyond enabling medium density development, but also are rigid in places through requiring 20% of high density and 20% medium density allotments.</p> <p><u>Relief Sought</u></p> <p>Retaining change as proposed.</p>

Chapter 6: Urban Environment Effects

Provision	
6.1.1	<p><u>Nature and Reasons for submission</u></p> <p>This change to Issue 6.1.1 recognises that urban development involved both urban expansion or intensification, or a combination of both. This change is supported as urban expansion can also incorporate a range of housing typologies at different densities.</p> <p><u>Relief Sought</u></p> <p>Retain change as proposed.</p>
6.1.3.1(j)	<p><u>Nature and Reasons for submission</u></p> <p>This change to Policy 6.1.3.1(j) to recognise that cycling is also a part of sustainable urban design. This change is supported as cycling, including electric modes, are now a significant and growing form of alternative transport.</p> <p><u>Relief Sought</u></p> <p>Retain change as proposed.</p>
6.1.3.1A	<p><u>Nature and Reasons for submission</u></p> <p>This change proposes to insert "Wakefield" into Policy 6.1.3.1A, with the focus of this policy being on the <i>encouragement</i> of medium density housing in identified areas. This encouragement is supported, including within the planning framework for Wakefield.</p> <p><u>Relief Sought</u></p> <p>Retain change as proposed.</p>
6.1.3.1B	<p><u>Nature and Reasons for submission</u></p> <p>This is a new policy that seeks to ensure that <i>higher density</i> housing options in the WDA achieve a high standard of amenity through design in accordance with the Urban Design Guide.</p> <p><u>Relief Sought</u></p> <p>Retain change as proposed.</p>
6.2.3.2	<p><u>Nature and Reasons for submission</u></p> <p>This change to Policy 6.2.3.2 both now adds in Wakefield but also changes 'permit' to 'enable'. This change is supported as it is considered appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain change as proposed.</p>
6.2.3.2A	<p><u>Nature and Reasons for submission</u></p> <p>This change to Policy 6.2.3.2A is supported as it adds Wakefield into the policy.</p>

	<p><u>Relief Sought</u> Retain change as proposed.</p>
6.2.3.2B	<p><u>Nature and Reasons for submission</u> PC76 here proposes to add a new Policy 6.2.3.2B which directs (“by requiring”) that subdivision include a variety of lot sizes, including higher density housing options, to achieve efficient land use. This policy is considered to be inconsistent with the encouraging and enabling provisions provided in related policies. In addition, in combination with the new rules contained in Chapter 17, this requirement assumes the WDA will be a place that higher density housing is sought. While some high-density housing may form a part of the WDA, this approach is considered to create a significant risk to the developers of this land. This is because there are a number of factors / considerations that influence subdivision design, layout and density, such as market demand and servicing constraints.</p> <p><u>Relief Sought</u> Amend Policy 6.2.3.2B to “encourage” and “enable” higher density housing options rather than “requiring”.</p>
6.2.20.1	<p><u>Nature and Reasons for submission</u> Changes are proposed to methods (a) and (b) while a new method (ba) is also proposed. Each of these changes are supported, including in (ba) whereby the method is directed at <i>providing for</i> variety and higher density housing options, as opposed to <i>requiring</i> these.</p> <p><u>Relief Sought</u> Retain changes to 6.2.20.1.</p>
6.2.30	<p><u>Nature and Reasons for submission</u> The two changes to 6.2.30 are supported as they merely add reference to the changes made in early provisions of Chapter 6.</p> <p><u>Relief Sought</u> Retain changes as proposed.</p>
6.8.30 & 6.8A	<p><u>Nature and Reasons for submission</u> In combination, the change to Figure 6.8A and 6.8.30 propose to identify where the range of housing choices are expected to be available / provided for in specified development areas. It is noted that 6.8.30 also refers to 6.8B which does not seem to part of the TRMP.</p> <p>Figure 6.8A is located within Section 6.6 “Richmond” but contains information, both existing and proposed, that relates to areas outside of Richmond. As such Figure 6.8A is considered to be incorrectly located and should be relocated to an earlier section (i.e. 6.2 or 6.7). Figure 6.8A as proposed also excludes comprehensive residential development from Wakefield. These provisions do not therefore represent sound resource management and so are opposed.</p> <p><u>Relief Sought</u> Amend and relocate Figure 6.8A.</p>
6.17.1.2	<p><u>Nature and Reasons for submission</u> PC76 seeks to change issue 6.17.1.2 by adding reference to the dam break hazard in the north-eastern section of the Wakefield Development Area. This change is supported.</p> <p><u>Relief Sought</u> Retain change as proposed.</p>
6.17.1.6A	<p><u>Nature and Reasons for submission</u> PC76 proposes a new issue 6.17.1.6A that seeks to ensure a variety of housing options that achieves high standard of amenity and makes efficient use of land. It is</p>

	<p>considered that the word “ensure” should be replaced with “enable” or “encourage” in line with the wider planning framework.</p> <p><u>Relief Sought</u> Amend issue as set out above.</p>
6.17.1.7A	<p><u>Nature and Reasons for submission</u> A new issue 6.17.1.7A is also proposed that seeks to ensure the provision of emergency vehicle access to the WDA via Higgins Road. This is supported.</p> <p><u>Relief Sought</u> Retain policy as proposed.</p>
6.17.3.2A	<p><u>Nature and Reasons for submission</u> This new policy requires that flood risks and dam break hazards be managed in the WDA. This policy is supported.</p> <p><u>Relief Sought</u> Retain policy as proposed.</p>
6.17.3.3	<p><u>Nature and Reasons for submission</u> This proposed change amends policy 6.17.3.3 with a focus on supporting a range of residential options within the WDA. This change is supported as supporting a range of housing options through enabling provisions is good practice.</p> <p><u>Relief Sought</u> Retain policy as proposed.</p>
6.17.3.7	<p><u>Nature and Reasons for submission</u> This proposed change amends policy 6.17.3.7 by adding reference to the WDA. This again provides support to the encouragement of diversity of housing in the WDA.</p> <p><u>Relief Sought</u> Retain policy as proposed.</p>
6.17.3.7A	<p><u>Nature and Reasons for submission</u> This new policy seeks to “require” a variety of lot sizes and higher density housing options which achieves high standard of amenity by using the Urban Design Guide. The mandatory imposition of lot sizes and higher density housing options is opposed. A variety of housing will occur naturally. It is considered more appropriate to simply provide an enabling planning framework and encourage diversity rather than set strict requirements.</p> <p><u>Relief Sought</u> Amend policy by removing the word “require” and replace with the word “enable”.</p>
6.17.3.7B	<p><u>Nature and Reasons for submission</u> This new policy seeks to “require” a variety of lot sizes and higher density housing options through a mandatory mixture of lot sizes and encourage Compact Density Development using a non-notification provision. The mandatory imposition of lot sizes is opposed. A variety will occur naturally. It is considered more appropriate to simply provide an enabling planning framework and encourage diversity rather than set strict requirements.</p> <p><u>Relief Sought</u> Amend policy by removing the word “require” and replace with the word “enable”.</p>
6.17.3.12	<p><u>Nature and Reasons for submission</u> This policy seeks to manage the effects of the expansion of Wakefield on land of high productive values by development that makes the efficient use of land. This policy seems to suggest the subject land is highly productive, which it is not. It is however considered appropriate to ensure greenfield land is used efficiently. Using this land</p>

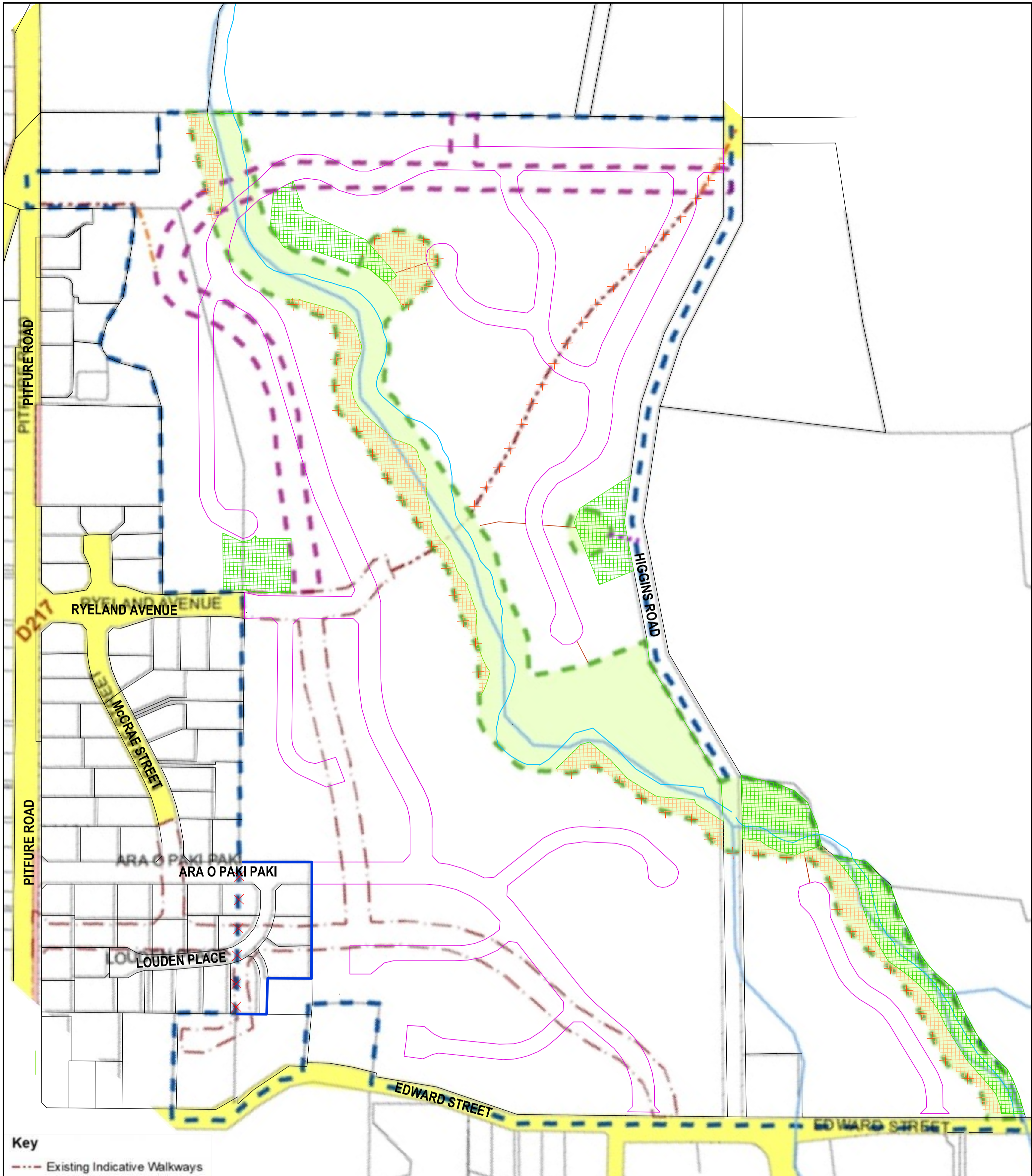
	<p>efficiently also helps to alleviate pressure on land elsewhere that may include land of high productive value.</p> <p><u>Relief Sought</u></p> <p>Amend policy to direct that the land be developed efficiently, so that pressure on land elsewhere is alleviated.</p>
6.17.20.1	<p><u>Nature and Reasons for submission</u></p> <p>This involves a new method (d) which identifies rule that “<i>require a variety of lot zones and enable higher density housing options</i>”. For the reasons also outlined above, enabling or encouraging variety and higher density development is appropriate. Requiring or imposing mandatory requirements is opposed as this seeks to decide what the market wants in this location.</p> <p><u>Relief Sought</u></p> <p>Amend method to align with the enablement of variety and higher density housing options.</p>
6.17.30	<p><u>Nature and Reasons for submission</u></p> <p>Changes are proposed to the explanation and reasons in 6.17.30. These changes are supported, particular the explanation provided in relation to the non-notification provisions which seek efficient use of land and infrastructure, ‘<i>encourage</i>’ medium density housing, and seek a range of living opportunities and housing densities.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
Chapter 16: General Rules	
Provision	
16.3.3.1	<p><u>Nature and Reasons for submission</u></p> <p>The proposed changes to Figure 16.3A (xiii and xiv) are opposed. These changes are opposed as the introduction of a rule framework relating to the size of parent titles (less than or greater than 2 hectares) has no practical relevance to the subject land under single ownership and in one large title. In essence, with the entire site being significantly greater than 2 hectares, Figure 16.3AB will apply to all subdivision. This will require 20% of all allotments being high density (270m² to 350m²), and 20% medium density (350m² to 450m²). This is significantly more high and medium density allotments than that conceptually masterplanned, being at approximately 15% as opposed to 40% required by PC76. As such, the proposed changes to Figure 16.3A are considered to be unrealistic for Wakefield and unreasonable when the wide range of factors are considered in undertaking subdivision development.</p> <p>In addition, enabling 2 dwellings to be constructed on a single certificate of title would provide an opportunity to help support a wider range of circumstances, such as dependent relative and entry into the housing market with support from family.</p> <p><u>Relief Sought</u></p> <p>Delete proposed change to Figure 16.3A and substitute these requirements with an enabling planning framework.</p>
16.3.3.1	<p><u>Nature and Reasons for submission</u></p> <p>This change simply adds Wakefield into this rule which is supported. This change is necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
16.3.3.1	<p><u>Nature and Reasons for submission</u></p> <p>This change simply adds Wakefield into this heritage rule. 16.3.3.1(m(ii)). This change is necessary and appropriate.</p>

	<p><u>Relief Sought</u> Retain changes as proposed.</p>
16.3.3.1	<p><u>Nature and Reasons for submission</u> This change to 16.3.3.1(n), combined with the new 16.3.3.1B (addressed below), is opposed on the basis that the minimum density requirements are considered to be unrealistic and unreasonable. Refer to reasons given to opposing Figure 16.3A (xiii and xiv) above.</p> <p><u>Relief Sought</u> Delete proposed change to 16.3.3.1(n) and substitute these requirements with an enabling planning framework.</p>
16.3.3.1	<p><u>Nature and Reasons for submission</u> This change adds in a new matter of control (16.3.3.1 (18)), being the matters of flood and dam break hazards. This change is necessary and appropriate.</p> <p><u>Relief Sought</u> Retain changes as proposed.</p>
16.3.3.1B	<p><u>Nature and Reasons for submission</u> This new rule 16.3.3.1B, combined with the new 16.3.3.1 (n) (addressed above), is opposed on the basis that the minimum density requirements are considered to be unrealistic and unreasonable. Refer to reasons given to opposing Figure 16.3A (xiii and xiv) above.</p> <p><u>Relief Sought</u> Delete proposed change to 16.3.3.1(n) and substitute these requirements with an enabling planning framework.</p>
16.3.3.2A & 16.3.3.2C	<p><u>Nature and Reasons for submission</u> This proposed change to 16.3.3.2A(c)(i) continue the approach of having minimum allotment areas related to whether the land to be subdivided is less than or greater than 2 hectares. This 2-hectare threshold is erroneous as the subject land in the WDA is all greater than 2-hectares, and in single ownership, and so has little practical relevance. As such this rule and associated rules/provisions, such as 16.3.3.2C, are opposed.</p> <p><u>Relief Sought</u> Oppose changes as proposed.</p>
16.3.3.4	<p><u>Nature and Reasons for submission</u> The changes proposed to 16.3.3.4 would make the activity of subdivision a non-complying activity if the density requirements in 16.3.3.1B(a) are not complied with. This activity status is considered to be overly directive given the range of factors that may lead to a subdivision that does not achieve the density requirements. Hence, while the density requirements are themselves opposed, so too is this non-comply activity status proposed.</p> <p><u>Relief Sought</u> Amend rule to remove non-complying activity status.</p>
16.3.20	<p><u>Nature and Reasons for submission</u> The Reasons for the above rules are explained in 16.2.30 of proposed PC76. Explanation is considered necessary and appropriate, however for the reasons set out in this wider submission, the proposed requirement 20% high density and 20% medium density is opposed. This is because these requirements are unrealistic and unreasonable. The applicant does plan for a diversity of residential allotment sizes and an enabling planning framework would help achieve that.</p> <p><u>Relief Sought</u></p>

	Amend explanation as necessary.
16.3B & 16.3C	<p><u>Nature and Reasons for submission</u></p> <p>The proposed changes to Schedules 16.3B and 16.3C are considered to be necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
Chapter 17: Zone Rules	
Provision	
17.1.3.3	<p><u>Nature and Reasons for submission</u></p> <p>The proposed changes to 17.1.3.3 are considered to be necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
17.1.3.4A	<p><u>Nature and Reasons for submission</u></p> <p>The proposed change to 17.1.3.4A is considered to be necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
17.1.3.4B	<p><u>Nature and Reasons for submission</u></p> <p>The proposed changes to 17.1.3.4B are considered to be necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
17.1.20	<p><u>Nature and Reasons for submission</u></p> <p>The proposed changes to 17.1.20 are considered to be necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
17.14A	<p><u>Nature and Reasons for submission</u></p> <p>The proposed changes to 17.14 are considered to be necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
Chapter 19: Information Requirements with Land Use Consent or Subdivision Consent Applications	
Provision	
19.2.1.12	<p><u>Nature and Reasons for submission</u></p> <p>The proposed changes to 19.2.1.12 are considered to be necessary and appropriate.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
19.2.2.7	<p><u>Nature and Reasons for submission</u></p> <p>This submission to the proposed information requirements in 19.2.2.7 is made alongside the opposition to the requirement to provide high and medium density allotments (see various submissions above).</p> <p>The new information requirement in (e) requires information as to how a variety of housing options (including higher density housing) is achieved, and if <i>not practicable</i>, justification as to why. While the provision of <i>a variety</i> of housing options within the wider WDA will help serve a range of needs and enhance land use efficiency, there are wide range of considerations beyond 'practicability' that determine the range of housing options included in subdivision design. It is therefore submitted that this</p>

	<p>new information requirement should be widened to include matters such as a) market demand; b) serviceability; c) subdivision design considerations.</p> <p><u>Relief Sought</u></p> <p>Amend 19.2.2.7 to ensure the appropriate range of considerations are included.</p>
Part II – Appendix 2: Urban Design Guide	
Provision	
Part II	<p><u>Nature and Reasons for submission</u></p> <p>The changes proposed to the Urban Design Guide are supported given that they simply seek to include the WDA into this part of the planning framework. However, there are other components of PC76 relating to the density requirements that are opposed, that also translate into the applicability of some of the principles in the Urban Design Guide.</p> <p><u>Relief Sought</u></p> <p>Retain changes as proposed.</p>
Planning Maps	
Provision	
Maps 22, 58 and 91	<p><u>Nature and Reasons for submission</u></p> <p>Update Map 76/1 proposes a number of changes to Area Maps 22, 58 and 91. Each of these changes are identified and submitted on below.</p> <p>Attached to this submission is:</p> <ul style="list-style-type: none"> - a conceptual masterplan (PC76 – WVD – Masterplan) of a potential subdivision within this development area; - an amended version of Update Map 76/1 (PC76 – WVD – Proposed Indicative Items – 76-1) showing the location of indicative areas in line with the attached masterplan. <p>While the masterplan has now yet progressed through the rigour of a resource consent process, it is considered that this masterplan provides a more realistic and appropriate alignment for indicative walkways, roads and reserves (particularly for the Pitfure Stream corridor), as shown on the amended version of the Indicative Areas.</p> <p>The changes proposed as a part of Map 76/1 are therefore conditionally supported, however it is considered that the alignments of the walkways, road and reserves should be amended in recognition of the work undertaken to masterplan this site.</p> <p><u>Relief Sought</u></p> <ul style="list-style-type: none"> a) Amend alignment of the indicative walkways in response to the attached plans. b) Amend alignment of the indicative roads in response to the attached plans. c) Amend alignment of the indicative reserves in response to attached plans.
Maps 22, 58 and 91	<p><u>Nature and Reasons for submission</u></p> <p>Update Map 76/2 proposes to rezone the current <i>Rural 2</i> and <i>Rural Residential Zones</i> and rezoned as <i>Rural 2 deferred Residential</i>. These changes are supported however it is the submitters understanding that the current Residential Zone boundary was intended to relate to topography, being the upper terrace to Pitfure Stream corridor. As such, it is considered appropriate to realign the <i>current</i> Residential Zone boundary to follow the topography of the upper terrace as reflected on the attached masterplan prepared by the submitter and as shown on the following attachments:</p> <ul style="list-style-type: none"> - PC76 – WVD – Zoning – 76-2; - PC76 – WVD – Zoning Topo 76-2. <p>This would also serve to enhance the efficient use and development of this land in future when it comes to subdivision planning and design processes.</p>

	<p>Update Map 76/2 also proposes to identify the extent/boundary of the ‘<i>Wakefield Development Area</i>’ (WDA). The identified boundary generally corresponds with the definition of the Wakefield Development Area provided within Section 2.2 of PC76, being the area between Pitfure Road, Edward Street, and Higgins Road as shown on the planning maps. While the identification of the WDA is supported as a part of PC76, it is noted that the proposed boundary of the WDA also includes a large area of existing residentially zoned land with some already having obtained resource consent approval to subdivide etc. Given the requirement to provide high and medium density allotments as a part of PC76, and the stated opposition to those specific provisions, the submitter also opposes the inclusion of the currently residential zoned land within the WDA (as per Update Map 76/2).</p> <p><u>Relief Sought</u></p> <p>a) Amend the current Residential Zone boundary to follow the existing upper terrace (western side) of the Pitfure Stream as shown on the attached plans.</p> <p>b) Amend the boundary of the Wakefield Development Area to exclude the current residentially zoned land as shown on the attached plans.</p>
Map 273	<p><u>Nature and Reasons for submission</u></p> <p>Update Map 76/3 proposed to apply the Fire Ban area over the newly proposed residential zoning within the WDA in accordance with Update Map 76/2. Given the submissions made above in relation of Update Map 76/2, this Fire ban Area needs to be adjusted to follow the final boundary of the current residential zone (top of terrace). A plan is attached (PC76 – WVD – Fore Ban Area) showing the requested change to this Fire Ban Area.</p> <p><u>Relief Sought</u></p> <p>Amend Update Map 76/3 in accordance with the plan attached.</p>



- Key**
- - - Existing Indicative Walkways
 - Add Indicative Walkways
 - - - Delete Indicative Walkway
 - - - Realigned Indicative Walkway
 - Rivers
 - - - Existing Indicative Roads
 - - - New Indicative Road
 - - - Add Indicative Reserve
 - - - Add Development Area

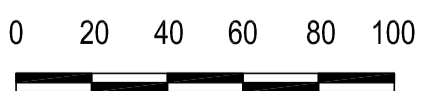
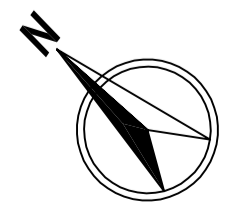
- AMENDED INDICATIVE ROAD
- RESERVE AREAS NOT PRACTICAL DUE TO TOPOGRAPHY
- PROPOSED RESERVE AREAS TO BE INCLUDED
- AMENDED INDICATIVE WALKWAY
- NEW DEVELOPMENT AREA BOUNDARY
- DELETE DEVELOPMENT AREA BOUNDARY
- DELETE WALKWAY

NOTES:
 1. THIS PLAN HAS BEEN PREPARED FOR PLANNING PURPOSES ONLY.
 2. PLAN CHANGE 76 IMAGE OVERLAY POSITION IS INDICATIVE ONLY.
 3. FINAL ZONING DETAILS AND SUBDIVISION LAYOUT IS SUBJECT TO CHANGE AND COUNCIL APPROVAL.



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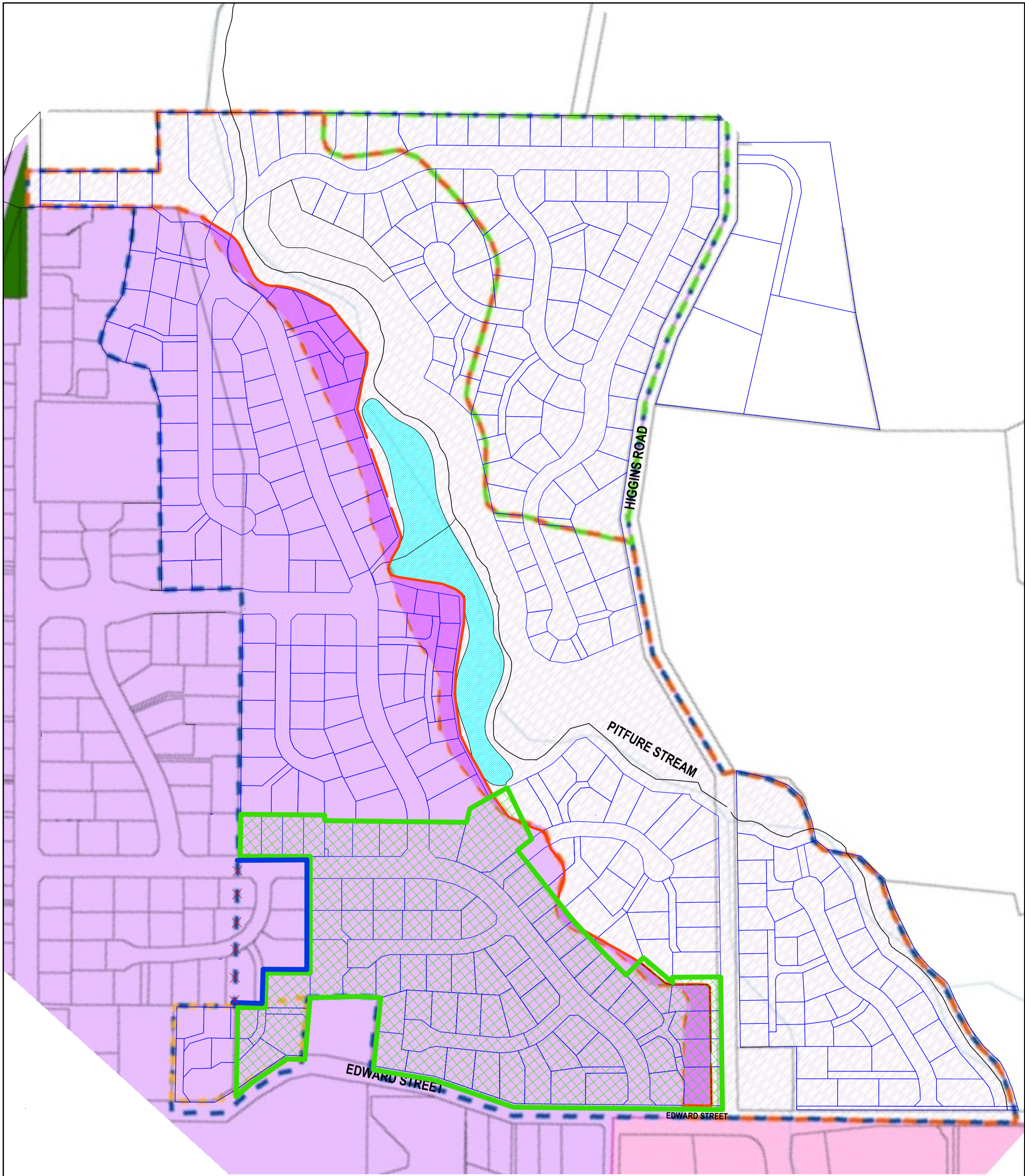







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SCALE 1:2000 @A2 Date: 13 Oct. 2022 Sheet 1 of 1 Job No.: R1427

JOB TITLE: **WAKEFIELD VILLAGE DEVELOPMENT LTD
 177 EDWARD STREET, WAKEFIELD**

DRAWING TITLE: **PROPOSED AMENDMENTS
 RESIDENTIAL GROWTH AREA - PROPOSED INDICATIVE ITEMS
 (EXTRACT FROM UPDATE MAP 76/1) OVERLAY**



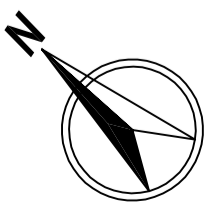
- KEY:**
-  RESIDENTIAL ZONE AMENDMENT (TOP OF EMBANKMENT AS INTENDED)
 -  EXISTING CONSENTED AREA FOR RESIDENTIAL DEVELOPMENT
 -  PROPOSED SECTIONS
 -  NEW DEVELOPMENT AREA BOUNDARY
 -  DELETE DEVELOPMENT AREA BOUNDARY

NOTES:
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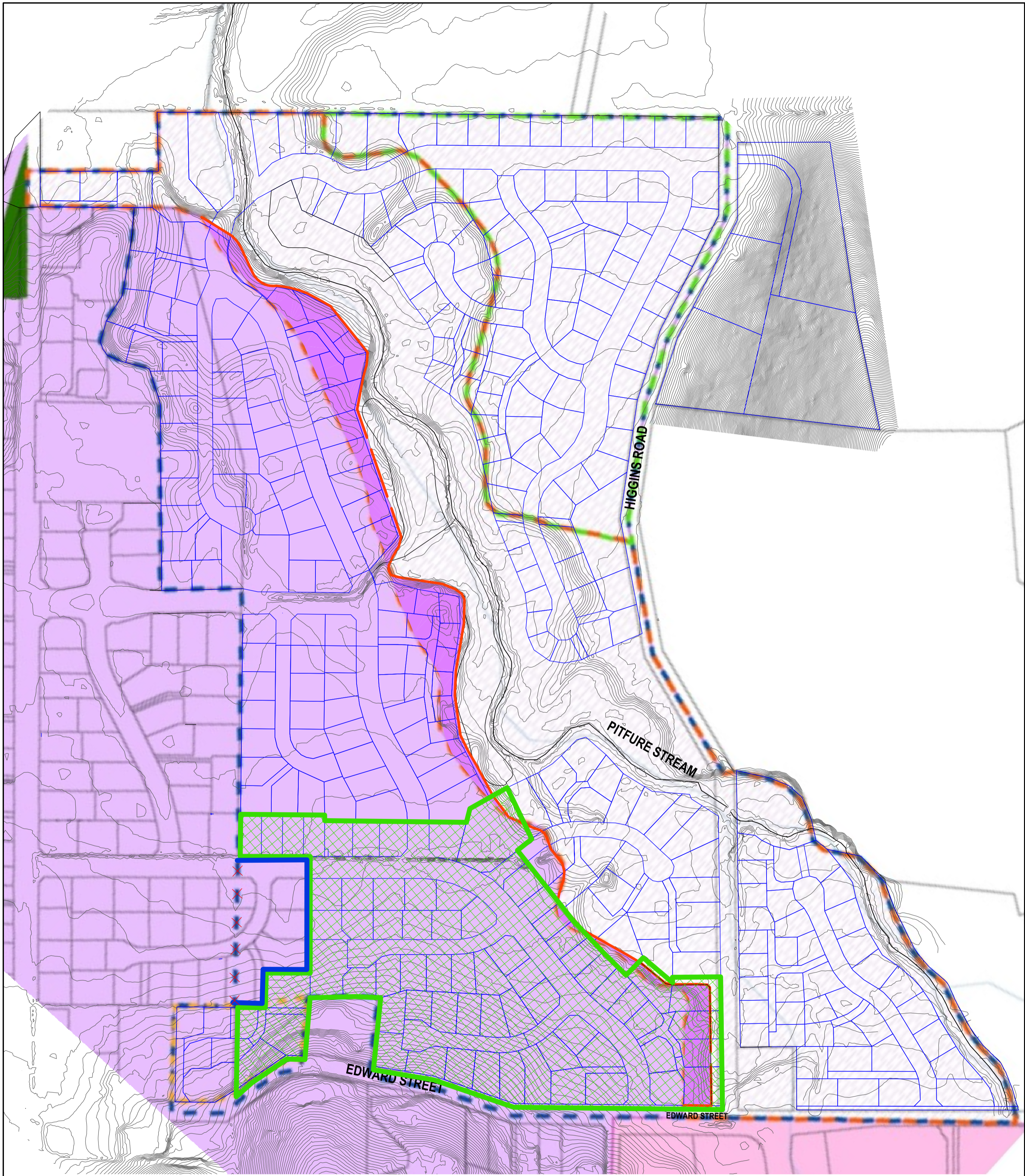
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SCALE 1:2000 @A2 Date: 13 Oct. 2022 Sheet 1 of 1 Job No.: R1427

JOB TITLE:
**WAKEFIELD VILLAGE DEVELOPMENT LTD
 177 EDWARD STREET, WAKEFIELD**

DRAWING TITLE:
**PROPOSED RE-ZONING - WAKEFIELD DEVELOPMENT AREA (EXTRACT
 FROM UPDATE MAP 76/2) - RESIDENTIAL ZONE AMENDMENT**



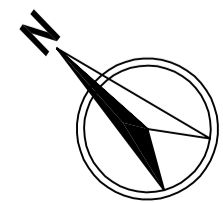
- KEY:**
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 -  EXISTING CONSENTED AREA FOR RESIDENTIAL DEVELOPMENT
 -  PROPOSED SECTIONS
 -  NEW DEVELOPMENT AREA BOUNDARY
 -  DELETE DEVELOPMENT AREA BOUNDARY

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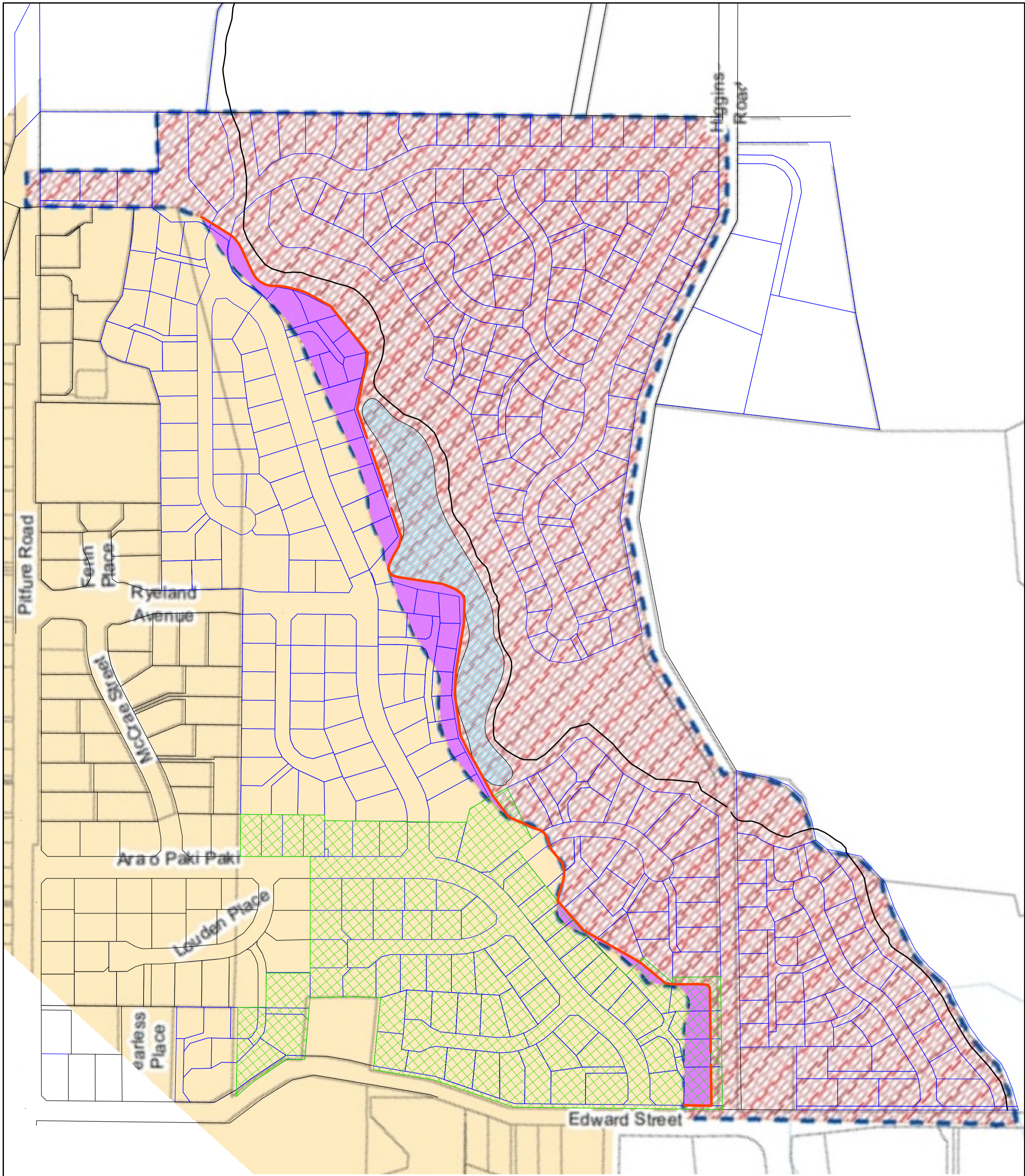
Date: 13 Oct. 2022


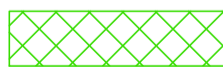

Sheet 1 of 1

Job No.: R1427

JOB TITLE:
WAKEFIELD VILLAGE DEVELOPMENT LTD
177 EDWARD STREET, WAKEFIELD

DRAWING TITLE:
PROPOSED RE-ZONING - WAKEFIELD DEVELOPMENT AREA (EXTRACT FROM UPDATE MAP 76/2) - RESIDENTIAL ZONE AMENDMENT (TOPOGRAPHIC)



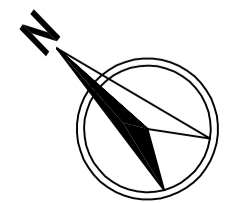
- KEY:**
-  RESIDENTIAL ZONE AMENDMENT (TOP OF EMBANKMENT AS INTENDED)
 -  EXISTING CONSENTED AREA FOR RESIDENTIAL DEVELOPMENT
 -  PROPOSED SECTIONS

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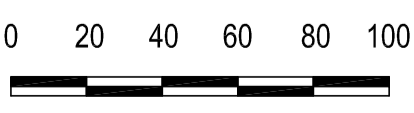


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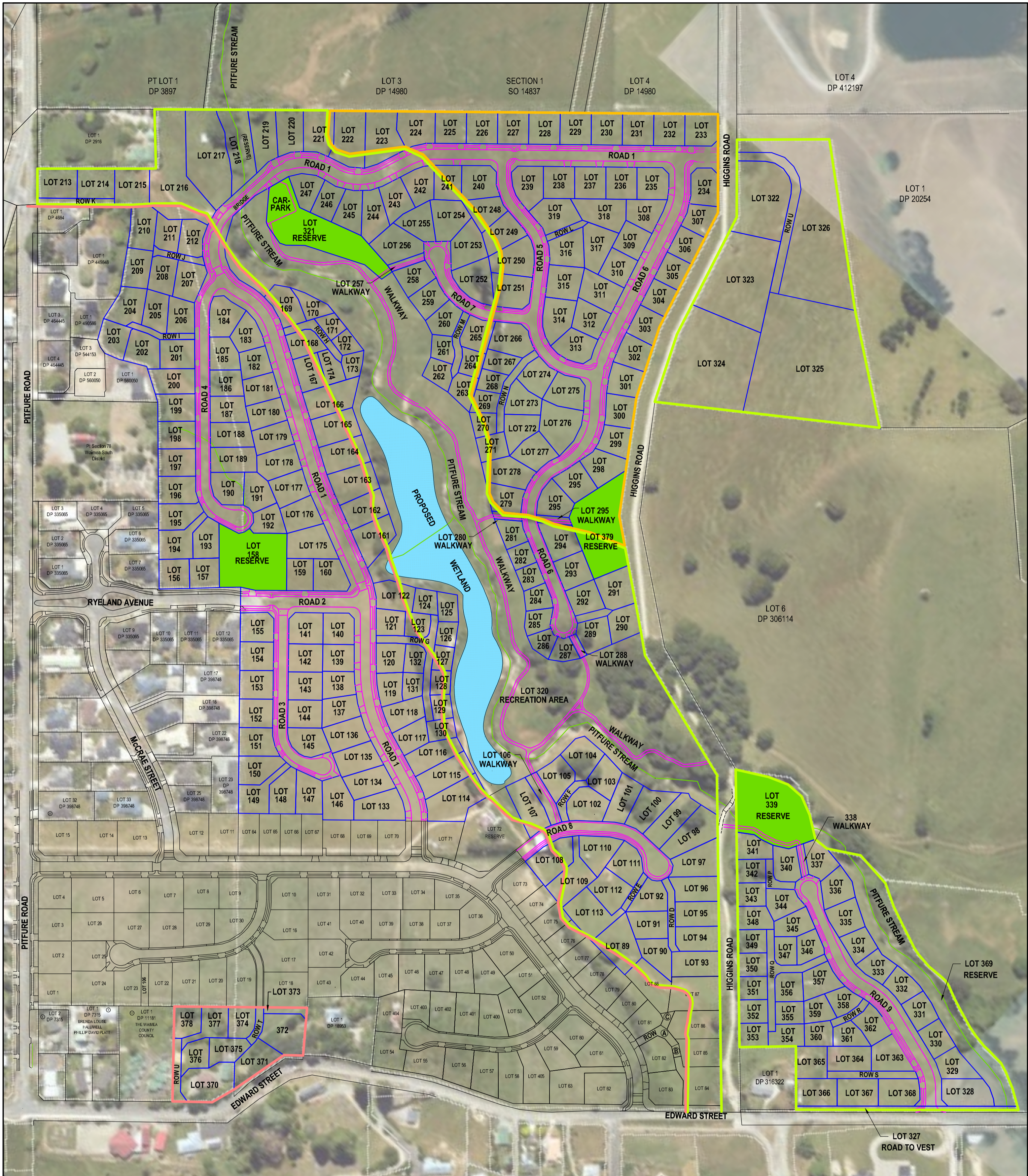


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Date: 13 Oct. 2022 Sheet 1 of 1 Job No.: R1427

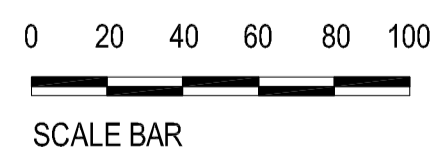
JOB TITLE:
**WAKEFIELD VILLAGE DEVELOPMENT LTD
 177 EDWARD STREET, WAKEFIELD**

DRAWING TITLE:
**PROPOSED RE-ZONING - WAKEFIELD DEVELOPMENT AREA
 (EXTRACT FROM UPDATE MAP 76/2)
 DEFERRED FIRE SENSITIVE AREA OVERLAY**



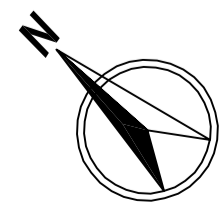
- NOTES:**
1. CONCEPT DETAILS AND LOT LAYOUT SHOWN ARE INDICATIVE AND SUBJECT TO COUNCIL APPROVAL AND GEOTECH ASSESSMENT.
 2. PROPOSED ROAD AND RIGHT OF WAY DETAILS ARE INDICATIVE ONLY AND SUBJECT TO CHANGE. DETAILED DESIGN AND SITE SURVEY IS REQUIRED TO ENSURE THIS LAYOUT IS ACHIEVABLE AND APPROVAL FROM GEOTECH ENGINEER.
 3. EXISTING AND PROPOSED BOUNDARIES ARE SUBJECT TO SURVEY, COUNCIL AND LINZ APPROVAL.
 4. THIS DATA HAS BEEN PREPARED FOR CONCEPT PURPOSES ONLY AND IT MAY VARY CONSIDERABLY FROM THE FINAL PLANS.
 5. THIS PLAN SHOULD NOT BE USED AS THE BASIS FOR SALE AND PURCHASE AGREEMENTS AS:
 - AREAS, DIMENSIONS AND POSITIONING OF SERVICES ARE SUBJECT TO SURVEY, DESIGN AND COUNCIL APPROVAL.
 - THE DESIGN MAY VARY DUE TO BUILDING CONSTRAINTS AND/OR CLIENT INSTRUCTIONS.
 6. AERIAL PHOTO AND CONTOURS HAV BEEN DOWNLOADED FROM COUNCIL GIS WEBSITE AND OVERLAYED AS ACCURATE AS POSSIBLE.

	RESIDENTIAL ZONE
	RURAL 2 DEFERRED RURAL RESIDENTIAL ZONE
	RURAL 2 ZONE



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Date: 13 Oct. 2022

Sheet 1 of 1 Job No.: R1427

JOB TITLE:
**WAKEFIELD VILLAGE DEVELOPMENT LTD
177 EDWARD STREET, WAKEFIELD**

DRAWING TITLE:
**CONCEPT LAYOUT OF LOTS 107 & 108 RM150714V,
LOT 2 DP 11181 (NO. 113 EDWARD STREET),
LOT 2 DP 316322 AND LOT 5 DP 303114 (NO. 177 EDWARD STREET)**