

HAVE A SAY

You are invited to make a submission on the proposed Plan Change. Submissions close at 4.00 pm on Monday, 14 March, 2016.



Submission on a Variation/Change to the Tasman Resource Management Plan

Return your submission by the advertised closing date to:

Manager, Policy
Tasman District Council
Private Bag 4, Richmond 7050 OR
189 Queen Street, Richmond OR
Fax 543-9524 OR Email steve.markham@tasman.govt.nz

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.



Initials: *BJ*

Submitter No. 4033

Submitter Name: Barry Jenkins
(organization/individual)

Representative/Contact: _____
(if different from above)

Postal Address: _____

Home Phone: 027 2307 468

Bus. Phone: _____

Fax: _____

Email: barrypurple@gmail.com

Date: 9/3/2016

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

Signature: *Barry Jenkins*
(Signature of person making the submission or person authorised to sign on behalf of person making the submission)

Total number of pages submitted: _____

IMPORTANT – Please state:

This submission relates to Variation/Change No.: _____

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

Variation/Change Title/Subject: _____

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

(1) My submission relates to: Provision No or Planning Map No. (Please specify, e.g. 34.2.20(a)(iii) or Zone Map 25)	(2) My submission is that: (State concisely the nature of your submission and clearly indicate whether you: • support or oppose the specific provisions, or • wish to have amendments made, giving reasons)	(3) I seek the following decisions from the Tasman District Council: (Give precise details of the nature of the decision you seek in relation to the variation number and provision/map number given in column (1), e.g. addition, deletion or alteration. The more specific you can be the easier it will be for Council to understand your concerns.)	OFFICE USE Submission No.
	I think that more leeway should be given to co-operative living and low impact development where people are taking Responsibility for their own waste (e.g. composting) / methane producing toilets and using grey water for plant irrigation.		①
	This kind of activity takes pressure off of council services and I believe is the way of the future		
	I would like to see more acceptability of multiple occupancy (on non-productive land) regardless of size of section		②
	If dwellings / places are managed respectful in regard to their impact on the environment (including neighbours), this should be easier to 'allowed'		
	Issues that I support change in: (ie more leniency)		
	- Multiple occupancy		
	- temporary Dwellings		③

Feel free to contact us:



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Murchison
 92 Fairfax Street
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 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

R. 14/3/16

4034

Submission on a Change to the Tasman Resource Management Plan

Submitter Name: John Kebbell

Postal Address: P.O.Box 219, Takaka 7142

Home Phone: 021489655

Email: johnkebbell@gmail.com

Date: 14 March 2016

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

This submission relates to: Proposed Change 60 - Rural Land Use and Subdivision Policy Review

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

John Kebbell Submission on Proposed Change 60: Rural Land Use and Subdivision Policy Review (14th March 2016)

1) Delete – “17.6.3.1 (ea) There are no more than two sleepouts for any dwelling.”

①

This rule seems like an attempt to stifle any effort for co-operative living. Given the large input from especially the Golden Bay people towards demanding more flexibility for co-operative living, this rule is unnecessary and unfair. Sleepouts are a low impact development, with any potential impact adequately controlled by other rules. I ask that the existing rule continue, in that there is no restriction on the number sleepouts per dwelling.

2) Delete – “17.6.3.1 (g) The distance of either sleepout from the principal dwelling is no more than 20 metres.”

②

This rule seems like a further attempt to stifle efforts of co-operative living and offers little flexibility for sleepout intentions. What difference does it make if the sleepout is 20m away or 80m away, where is the impact? Sleepouts are a low impact development, with any potential impact adequately controlled by other rules. It seems to me the only intention to place such a control is to ensure such sleepouts are part a single household. Often the intention of sleepouts is to provide accommodation for friends and extended family for when they come and visit. Adequate distance and privacy for such guests is important, the 20m rule is unnecessary and inflexible to the normal intentions of a LID sleepout. Also in my situation I have an interest in meditation huts, a hut to escape to, to gain clarity, peace and connection to nature and spirit. I do not wish to build such meditation sleepout huts within 20m of a dwelling. Such huts will be 10m² and not needing building consent, it is unreasonable to have to seek resource consent for such a low impact activity, adding unnecessary costs for individual and Council.

3) Delete - “17.6.3.1 (gb) The sleepout is not part of a cooperative living activity.”

③

More attempt to control cooperative living. Why should the intentions of cooperative living be burdened with the cost of resource consent?

Sleepouts are a low impact development. Why this rule, what is the impact? Other rules adequately control any potential impact cooperative living could have. This rule is unnecessary and unfair. The Golden Bay people have spoken, please be more flexible and forgiving towards genuine people who wish to have a roof over their heads in a country where it is becoming more and more difficult to own your first home.

4) Delete – proposed 17.6.3.1 (n) rule – “Dwellings and habitable buildings are set back at least: (i) 30 metres from any internal boundary, except where the activity is an alteration to an existing dwelling, and the existing setback to the boundary is not thereby reduced;”

Keep existing operative rule (n) – “If the adjoining property has horticultural plantings where pesticides.....”

4

From reading the Section 32 report, it seems the intention to delete the existing rule (n) and create the new rule is to ensure; (a) productive land is not limited by first come, first served principle (b) to minimize cross boundary conflicts and (c) to preserve rural character/amenity.

The proposed change seems to have not fully considered the impact and effects on the residential properties (lifestyle blocks) in the rural zone and its intentions seem solely focused on the rural productive land. In my situation, my land has an average of about 100m boundary to boundary, as my land is long and skinny. My neighbors are similar, some shorter. I wonder how many other similar smallholdings there are in the rural zones, in the Tasman region. Such a proposed restriction of 30m, would mean a compulsory resource consent for a main dwelling in most situations for such property's, when choosing the most appropriate building site (lay of land, trees, sun, view etc). This is unfair and unreasonable to implement such costs on such properties, given the intentions setout. I grew up on a farm with residential properties close by and I still live in such a situation. In most situations disputes are worked out and minor. The main issue often is spray drift, but in the existing rule, this is adequately and fairly addressed I feel. I think it is unreasonable and unfair to change that rule to the proposed which would mean an instant burden of cost to many rural lifestyle properties, for minor gain in my opinion. Meaning often such a setback would not be necessary.

In regards to rural character, a house 5m from boundary is not necessary a detriment to the rural character. I think most homes are built in relation to their surroundings and complement rather than distract from their

environment. I think the constraints on subdivision are adequate in itself to ensure rural character/amenity is not compromised. This proposed change will do little to preserve but will do lots to increase burden of cost to individual and Council. Also if a dwelling 5m to boundary does impact on rural character/amenity, why only the constraint on dwellings and not all buildings to the 30m distance? Arguably dwellings are more ascetically pleasing to the eye than outbuildings; this proposed rule doesn't make sense in its intentions to preserve rural character/amenity.

5) I support the sentiments expressed in the Golden Bay Community Boards submission in regards to Temporary Dwellings. I am also disappointed there is no movement in this area. I recommend the following –

Add new rule:

16.8.4 Low Impact Temporary Dwellings

16.8.4.1 Controlled Activities (Low Impact Temporary Dwellings)

A Low Impact Temporary Dwelling is a controlled activity, with an expiry of 5 years. A resource consent may be granted, if the activity complies with the following conditions:

- (a) The activity meets permitted conditions (a) – (r) of rule 17.6.2.1.
- (b) All buildings, including dwellings, meet permitted conditions (e) – (t) of rule 17.6.3.1 where applicable.
- (c) The activity uses disposal methods for effluent that are non-polluting on the environment. For example composting toilets.
- (d) The activity is readily movable and can be dismantled to leave the site in similar condition before activity was commenced.
- (e) The livable floor area of the dwelling is no greater than 30m². A resource consent is required. Consent may be refused or conditions imposed, only in respect of the following matters to which the Council has restricted its discretion:
 - (1) The extent to which the dwelling has retained or enhanced the potential of the land to support plant and animal production.
 - (2) The extent to which the dwelling is consistent with low impact design principles and methods.
 - (3) Provision for the long- term protection of the site from inappropriate subdivision contributing to land fragmentation of the site.
 - (4) The proposed legal arrangement regarding land and building ownership.
 - (5) Provision for and protection of areas of ecological value, landscape value, indigenous vegetation, trees, and cultural heritage

5

sites.

(6) The extent to which the dwelling minimises the potential for adverse cross-boundary effects and reverse sensitivity.

(7) Natural hazards within and beyond the site, including geotechnical and flood hazard effects.

(8) Effects on the rural landscape and on amenity values and coastal natural character.

(9) Effects on servicing, including road access, water supply, and wastewater and stormwater systems

6) I support Liz Thomas's submission and also the Golden Bay Community Boards Submission. I especially support from the GBCB submission – "If more options for affordable living situations are unable to be accommodated across the district, we request a special dispensation for Golden Bay. The Golden Bay Community Board to work with planning staff and councilors towards areas of agreement where some of these options can be explored, without adversely affecting other areas in the district."

6-
24

Supplementary Sheet

OFFICE USE Submitter Number: 4035

<p>(1) My submission relates to: Provision No or Planning Map No. <i>(Please specify, e.g. 34.2.20(a)(iii) or Zone Map 25)</i></p>	<p>(2) My submission is that: <i>(State concisely the nature of your submission and clearly indicate whether you: • support or oppose the specific provisions, or • wish to have amendments made, giving reasons)</i></p>	<p>(3) I seek the following decisions from the Tasman District Council: <i>(Give precise details of the nature of the decision you seek in relation to the variation number and provision/map number given in column (1), e.g. addition, deletion or alteration. The more specific you can be the easier it will be for Council to understand your concerns.)</i></p>	<p>OFFICE USE Submission No.</p>
<p>plan changes 60 Part. rural 2 zone.</p>	<p>I dont support the changes to boundary setbacks increasing and limiting the number of sleepouts or the restricted size of a second dwelling. limiting house keeping or granny flats to be 20m and attached is not practical in most rural situations. I would support all changes that allow and not restrict building for your family on your own land., multiple dwellings for all family members!!!, our 16 acres could be 30+suburbian houses but we would just like 4, one for each of our children to call home. There is more than enough room to do so, so lets make it happen.</p>	<p>the setbacks for buildings in rural 2 are to remain 5m or within with neighbourts consent, 30 m is way too much and makes good sites impractical due to "Rules"</p> <p>The second (AND SUBSEQUENT dwellings FOR EACH CLOSE FAMILY MEMBER) dwelling option sounds great but does not have to be of minor size to the first.</p> <p>The number of sleepouts should not be restricted to 2 or any.</p> <p>Multiple dwellings for close family members should be encourued in the housing shortage we face and written into this 30 year plan</p> <p>The (grannyflat)house keeping unit(s) does not have to be joined to main house and can be more than 20m away. This is unrealistic and not practical in most rural situations. 45m was too short too.</p> <p>Coverage area of 600m2 needs to go. Also, simple boundary adjustments between neighbours should be straight forward and not expensive where no new titles are made...</p>	<p align="center">① ② ③ ④ ⑦ ⑤ ⑥ ⑧</p>

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Fax 03 528 2024

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Submission on a Change to the Tasman Resource Management Plan

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Cover Sheet

OFFICE USE

Date received stamp:

14.3.16

Initials:

[Handwritten initials]

Submitter No.

4036

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: **Billy Kerrisk of Ray White Golden Bay**
(organisation/individual)

Representative/Contact:
(if different from above)

Postal Address:

**Ray White
Level 1, 11 Buxton Lane
Takaka 7110**

Home Phone:

Bus. Phone:

Fax:

Email: **billy.kerrisk@raywhite.com**

Date: **14-Mar-2016**

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

Signature:

NOTE: A signature is not required if you make your submission by electronic means.

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

IMPORTANT – Please state:

This submission relates to Change No.: **60**

Change Title/Subject:

Rural Land Use and Subdivision Policy Review

- 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.

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Please attach this cover sheet to your supplementary sheet(s) outlining your submission request(s).

Submission Rural Land Use and Subdivision Policy Review

By Billy Kerrisk ARIENZ, Ray White Golden Bay

YES I would like to speak to my submission

I attended the meeting in Takaka and for the most part support the changes. As I see the affects first hand, particularly on elderly land owners in rural zones, I would like the opportunity to speak to my submission.

I would also ask that our small community be HEARD and not drwned out by those over the hill in the town. We will never be able to compete with them on a head count. Our land mass on this side of the hill is unique, the character and community is envied by many, but will die if there is not more oppportunity for shared land use, multiple occupancy and alternatives to modern housing accepted by TDC.

GENERAL OVERVIEW PRESENTED

I **support** that the Rural productive activities are the Priority land use in rural zones and that Rural 1 and Rural 2 land is for productive uses
The rural ness of these areas is important. BUT too many properties in Golden Bay are incorrectly zoned.

1

I **support** Recognition of the need for appropriate housing for workers/family and a Long term view of subdivision (prevent fragmentation)

3 4

I **do not Support** addressing zone areas having been removed from the policy.

I **support** the change to housing on Rural zone 1 and 2
Minor dwelling (detached) option regardless of size (less than 80sqm plus 40sqm garage) and Attached second dwelling size is not restricted at all.

5

6

I **support the** Change from draft was to remove the limit on lot size, and did to include a minor dwelling opportunity

ALTERNATIVE HOUSING FORMS

I **support** the recognition for cooperative living and in particular New restricted discretionary activity for land (The list called matters of discretion they have to stick to). And support that land use consent can be applied for at the same time as for subdivision consent

7

8

9



Billy Kerrisk ARIENZ
Principal Selling Agent
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M +64 276 085 606
Level 1, 11 Suxton Lane, Takaka 7110
rwgoldenbay.co.nz

Ray White.



I am concerned that it was mentioned that neighbours can still shut down an application that might otherwise be approved.

SUBDIVISION

I support that Rural 1 and 2 are primarily for production therefore prefer not to subdivide at all but once again **I am very disappointed that the issue of incorrectly designated Rural 1 and 2 land has been left out.**

I support the more flexible "average lot size" but so many properties zoned Rural are already under 12 ha that this does not go far enough. There needs to be a policy for land that has already been subdivided to a point that it is no longer productive.

(10)
(11)

RURAL RESIDENTIAL ZONE RULES

I support that TDC preference now encouraging more development in rural residential zones but many of them in Golden Bay are **CLOSED.**

(12)

I support that a Minor dwelling is now allowable as a controlled activity if larger than 2 ha and Subdivision going to be easier "restricted discretionary" which apparently is easier.

(13)
(14)

WHAT WAS NOT REVIEWED

I request that as soon as possible zones themselves be reviewed or at least provision be made for a case by case request for re-zoning. Practical consideration in terms of location, productivity, appropriateness, patterns, or sizes of minimum, residential clusters etc need to be address as soon as possible in Golden Bay. Twenty years is simply too long to leave this massive issue unresolved.



Billy Kerrisk AREINZ



Billy Kerrisk AREINZ
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rwgoldenbay.co.nz

Ray White.



HAVE A SAY

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Submitter Name: DERRY KINGSTON
(~~organization~~/individual)

Representative/Contact:
(if different from above)
Postal Address: 1204 Abel Tasman Drive
Riccart Bay R.P.I. TAKAKA

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

IMPORTANT – Please state:

This submission relates to Variation/Change No.: 60

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



OFFICE USE
Date received stamp:
Initials: [Signature]
Submitter No. 4037

Home Phone: 03 525 4576

Bus. Phone:

Fax:

Email: helen.derry@extra.co.nz

Date: 10-3-2016

Signature: [Signature]
(Signature of person making the submission or person authorised to sign on behalf of person making the submission)

Total number of pages submitted: 1

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.

Submission on a Change to the Tasman Resource Management Plan

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Private Bag 4, Richmond 7050 OR
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Cover Sheet

OFFICE USE

Date received stamp:

11.3.16

Initials:



Submitter No.

4038

Note:

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Submitter Name: Vanessa & Magnus Koldau
(organisation/individual)

Representative/Contact:
(if different from above)

Postal Address:

87 Pigeon Valley South Branch Rd, RD2,
Wakefield 7096

Home Phone: 03 541 8518

Bus. Phone: 021 179 7818

Fax: _____

Email: mlkoldau@clear.net.nz

Date: 12-Mar-2016

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

Signature: V & M Koldau

NOTE: A signature is not required if you make your submission by electronic means.

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

IMPORTANT – Please state:

This submission relates to Change No.: 60

Change Title/Subject:

Rural Land Use and Subdivision Policy Review

- 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.

Please attach this cover sheet to your supplementary sheet(s) outlining your submission request(s).

Supplementary Sheet

OFFICE USE Submitter Number: **4038**

(1) My submission relates to: Provision No or Planning Map No. <i>(Please specify, e.g. 34.2.20(a)(iii) or Zone Map 25)</i>	(2) My submission is that: <i>(State concisely the nature of your submission and clearly indicate whether you:</i> • support or oppose the specific provisions, or • wish to have amendments made, giving reasons)	(3) I seek the following decisions from the Tasman District Council: <i>(Give precise details of the nature of the decision you seek in relation to the variation number and provision/map number given in column (1), e.g. addition, deletion or alteration.</i> <i>The more specific you can be the easier it will be for Council to understand your concerns.)</i>	OFFICE USE Submission No.
17.5.3.3 and similar in all rural zones	I support the increase of size of a minor dwelling from 60m ² to 80m ² or 120m ² including garage	I urge the council to proceed with this proposed change	①
17.5.3.2 and in all rural zones - 17.6.3.1	I support the use of existing structures to be converted to habitable dwellings	I urge the council to proceed with the proposed change	② ③
17.5.2.8A and in all rural zones - 17.6.2.8A	I support the restricted discretionary activity of cooperate living, however, I oppose the condition (8), natural character and rural amenity values. Council wishes to protect productive land which means clustering of dwellings. Clustering however is opposite to rural amenity of open space and low population density.	I urge the council to proceed with the proposed change but alter or delete condition 8 of rural amenity and character as this condition works against clustering of dwellings and structures.	④ ⑤
17.5.3.1 (ca) in Rural 1 and in all other Rural zones	I oppose the restriction of sleepouts to two per dwelling, and I strongly oppose councils intention to reduce the number of sleepouts further to two per main dwelling only.	To alter the rule to permit four sleepouts per main dwelling and two sleepouts per any other dwelling.	⑥
17.5.3.1 (ea) in Rural 1 and in all other rural zones - 17.6.3.1 (gb)	I oppose the idea that sleepouts are not part of cooperative living. In cooperative living there will be a communal kitchen, and sleepouts are a cheaper form of accommodation for young couples and older singles	To include sleepouts as a permitted activity in cooperative living.	⑦

353 2/2

Feel free to contact us:



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Supplementary Sheet

OFFICE USE Submitter Number: 4038

<p>(1) My submission relates to: Provision No or Planning Map No. <i>(Please specify, e.g. 34.2.20(a)(iii) or Zone Map 25)</i></p>	<p>(2) My submission is that: <i>(State concisely the nature of your submission and clearly indicate whether you: • support or oppose the specific provisions, or • wish to have amendments made, giving reasons)</i></p>	<p>(3) I seek the following decisions from the Tasman District Council: <i>(Give precise details of the nature of the decision you seek in relation to the variation number and provision/map number given in column (1), e.g. addition, deletion or alteration. The more specific you can be the easier it will be for Council to understand your concerns.)</i></p>	<p>OFFICE USE Submission No.</p>
<p>17.6.3.2 Controlled Activities (Building Construction, Alteration, or Use), (b) and (ba)</p>	<p>We support the provision to enable the construction of a minor dwelling additionally to the principal dwelling</p>	<p>To put the provision 17.6.3.2 Controlled Activities (Building Construction, Alteration, or Use), (b) and (ba) in Proposed Plan Change 60 into force</p>	<p align="center">8</p>

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2/2

3777 HotHouse Communications

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14 March 2016



R 14.3.16
4039
landmark life ltd
RESOURCE MANAGEMENT

Lucas House, 53 Halifax Street, Nelson
PO Box 342, Nelson 7040
Phone: 08 539 0820
Mobile: 027 244 8966
Email: mark@landmarklife.co.nz
www.landmarklife.co.nz

Tasman District Council
Private Bag 4
Richmond 7040
Attn: Steve Markham

Dear Steve,

**Plan Change 60: Rural Land Use and Subdivision Policy Review
Submission – Landmark Life Ltd**

Please find attached submissions in regard to Plan Change 60.

1. DEFINITION OF “HIGH PRODUCTIVE VALUE”

1.1 This submission relates to the proposed change of definition of “High Productive Value” within Chapter 2 of the TRMP.

1.2 The existing wording of the definition is:

High productive value – in relation to land, means land which has the following features:

(a) flat to gently rolling topography;

(b) free-draining, moderately deep to deep soils;

(c) moderate to good inherent soil fertility and structure;

(d) a climate with sufficient ground temperature, sunshine, available moisture, and calmness to make the land favourable for producing a wide range of types of plants.

[See “Classification System for Productive Land in the Tasman District”, Agriculture New Zealand, December 1994.]

1.3 The proposed wording of the definition is:

High productive value – in relation to land, means land which has a combination of at least two of the following features, one of which must be (a):

(a) a climate with sufficient soil temperature, sunshine, and available soil moisture;

(b) a slope of up to 13 degrees;

(c) imperfectly- to well-drained soils;

(d) soil with a potential rooting depth of more than 0.8 metres;

(e) soil that has no major fertility requirements that could not be practicably remedied;

where that combination is to such a degree that it makes the land capable of producing crops at a high rate or across a wide range.

Note: This meaning is adapted from "Classification System for Productive Land in the Tasman District", Agriculture New Zealand, December 1994 and is equivalent to land under classes A, B, and C.

1.4 The effect of the change identified above is to:

- (i) remove the necessity for all four criteria of the existing definition to apply in order for the land to be considered to be of high productive value; and instead to require that criterion (a) of the proposed definition is satisfied along with at least one other listed criteria.
- (ii) introduce a subjective assessment as to whether the combination of criteria is "to such a degree that it makes the land capable of producing crops at a high rate or across a wide range".

1.5 Plan Change 60 relates principally to amendments to the policy framework and rules for the Rural 1, Rural 2 and Rural Residential zones. The Section 32 report states that "*The Rural 3 zone has largely been excluded from this proposed Plan change as the rules are relatively new and have been the subject of significant earlier consultation.*" (p11)

1.6 However, in contrast to this sentiment, the amendment of the definition of "High Productive Value" will have far reaching implications for the Rural 3 zone and the implementation of the stated purpose of the zone in the TRMP. The policy framework, rules and design guide refer to the definition of High Productive Value, and therefore the assessment process and outcomes may be modified over the entire Rural 3 zone.

1.7 As a result, the proposed change to the definition is opposed for the following reasons:

- (i) The change will have unintended consequences of altering the productive land status of land that has already been identified as being available for potential development;
- (ii) The proposed definition will bring in a discretionary and subjective assessment that is less certain and more costly in order to assess. Applicants will no longer be expected to just investigate the fundamental principles of the productive qualities of the land and assess them against the criteria in the definition. Instead, there will be a requirement to assess whether the criteria make the land capable of producing crops at a high rate or across a wide range.
- (iii) The words "at a high rate" and "across a wide range" are not defined and no guidance is given in the plan change as to how these should be assessed. This promotes an undue level of uncertainty and ambiguity to the implementation of the definition.
- (iv) The change to the definition alters one of the fundamental assessment matters for the Rural 3 zone and may alter the outcomes set out in the Coastal Tasman Area Design Guide.
- (v) The change may broaden the areal extent of land considered to be of High Productive Value. This may have the unintended consequence of grouping land within the Rural 3 zone alongside land that is of greater productive value on areas such as the Riwaka Fan,

the Motueka Plains and the Waimea Plains. "Lowering the bar" in this way may be misleading.

1.8 For these reasons the change is opposed and the relief sought is that the existing definition be retained in the TRMP.

2. DEFINITION OF "RURAL RESIDENTIAL CHARACTER" AND "RURAL CHARACTER"

(2) (3)

2.1 The changes to these definitions apply to Rural 1, Rural 2 and Rural residential zones. However, they will also inadvertently affect the assessment of development opportunities in the Rural 3 zone.

2.2 The amendments will introduce new tests and assessment criteria into the Rural 3 assessment process by attempting to define the Rural Residential Character that may be seen as a development objective.

2.3 The Coastal Tasman Area Subdivision and Development Design Guide makes reference to "rural residential development" and reference to "rural character". The guidance and process set out in that document will be subverted by the changes to the definitions.

2.4 Identifying development opportunities in the Rural 3 zone already poses significant challenges to potential developers. The addition of

2.5 These definitions should not be adopted until there has been a full assessment of the effects of these definitions on the development outcomes for the Rural 3 zone.

2.6 For these reasons the changes are opposed and the relief sought is that the existing definition be retained in the TRMP.

3. WISH TO BE HEARD

3.1 The submitter wishes to be heard in support of these submissions.

Please contact me if you have any further queries.



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