Submitter # 2782

Received 12.10.22

tasman district council | Te Kaunihera o te tai o Aorere

COVER SHEET

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:

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Note:

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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: Hermann + Agnes SEIFRIED
(organisation/individual)

Representative/Contact:
(if different from above)

Postal Address:
PO Box 7020
Nelson 7042

Phone: 0274 451 555

Fax: –

Email: Hermann@Seifried.co.nz

Date: 11th Oct 2022

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

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

Signed: H. Seifried

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.: 75

Change Title/Subject: Brightwater Subdivision

☐ 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 on a Change to the Tasman Resource Management Plan

CONTENT SHEET

Sheet No.	2	of	2

Cover + 1

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

OFFICE USE Submitter Number:

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

- [x] 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.
- [ ] I **support in part** specific aspects/provisions of the Plan Change **as indicated below.**
- [ ] I **oppose in part** specific aspects/provisions of the Plan Change **and seek amendments as indicated below.**

Parts of the Plan Change *(Please list each provision number of the TRMP you wish to submit on, together with its corresponding submission point, as indicated below)*

Plan provision or map number(s): *State each specific provision (topic) number as addressed in the Plan Change*	The aspect of the provisions I support or oppose, together with reasons, are: *State the nature of each submission point and indicate whether you:* • *support or oppose the provision or wish to have it amended; and* • *the reasons for your view*	I seek that Council retains/deletes/replaces/amends the specific Plan Change provisions as follows: *For each submission point/provision number, state, specifically, what changes you would like to see.*
Example:		
17.5.3.1(ca)(iii)	*I oppose the restriction of … because …*	*Delete and replace condition 17.5.3.1(ca)(iii) with:*
	I support in its entirety.	

OFFICE USE: Submission No.

15243 Hothouse Creative

tasman district council

Te Kaunihera o te tai o Aorere

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

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

Motueka
7 Hickmott Place
PO Box 123
Motueka 7143
New Zealand
Phone 03 528 2022
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Takaka
78 Commercial Street
PO Box 74
Takaka 7142
New Zealand
Phone 03 525 0020
Fax 03 525 9972

Submitter # 4205

Received 13.10.22

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COVER SHEET

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

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Date received stamp:

Initials:

Submitter No.

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Submitter Name: Damien Prendergast
(organisation/individual)

Representative/Contact:
(if different from above)

Postal Address:
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RD.1 Brightwater
Nelson 7091

Phone: 027 2290 819

Fax:

Email: sanrakaia@gmail.com

Date: 12/10/22

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

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

Signed: D Prendergast

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.: Proposed Plan Change 75

Change Title/Subject: Brightwater – Residential Growth and Waimea West Road Re-Zoning

☐ 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 on a Change to the Tasman Resource Management Plan

CONTENT SHEET

Sheet No.	2	of	2

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

OFFICE USE Submitter Number:

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

- [x] 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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Parts of the Plan Change *(Please list each provision number of the TRMP you wish to submit on, together with its corresponding submission point, as indicated below)*

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OFFICE USE: Submission No.

15243 Hothouse Creative

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Website www.tasman.govt.nz
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Fax 03 523 1012

Motueka
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New Zealand
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Submitter # 336

Received 14.10.22

This submission essentially contends that the proposal to rezone Rural 1 zoned land (R1)in the Brightwater Development area (BDA) that is Incorporated in the S32 Report and referred to in clauses 2.2.1.2, 4.1.1.16, 4.2.1 and updated map 75/ 2, does not adequately address the proposed loss of highly productive land that is referred to in 4.1.1.17, 6.3.1, 6.9. In fact the BDA Objective in 7.1.1 does not include preserving highly productive land as a key change, yet it is a clear consequence of rezoning 11 ha of R1 land, and that is dismissed in 8.3.

Examination of Council reports and other documents on protecting highly productive land, and decisions made in the last 20 years shows a gradual weakening of commitment. For example, in Tasman Future Discussion Paper 2005 is noted the large increase 1996-2003 in subdivisions in R1 and R 2 land. In the last decade especially, Council has ignored the policy adopted following agreement with Horticulture New Zealand to protect such land. It has also paid diminishing regard to the TRPS such as: Objective 5.1 Avoidance of loss through urban development of potential of land having high productive value to meet needs of future generations, and similar TRMP objectives specifically agreed to protect such land.

Council has recognised that land Is not a fungible asset with interchangeable values across different uses. If it is to adopt the population growth projections built into Proposed PC75 it must accept that providing extra food for extra people as well as economic businesses for their employment is a necessity.

It is well established that there are very limited areas of high actual and potential value for food production in NZ with a commonly accepted figure of about 5%. Tasman has a similar proportion but with two notable constraints. With 62% of the district in public conservation land and 22% in private forest there is only 10% of food productive land. Secondly, the half that meets contour, soils and water specifications has constraints and limits of location for transport, labour and relevant infrastructure, and various climatic negative influences to further reduce suitability of the available area.

Council employed highly regarded soils expert Dr Iain Campbell who reported in 2017:
“ an assessment of the productive land resources of New Zealand was made by Leamy (1974) who showed that the area of available highly productive land in Nelson was amongst the smallest in New Zealand. The Waimea Plains, approximately 7500 ha, comprises about one-third of the most productive soil resource in Nelson Province. The other areas being the Motueka plain and Takaka Valley, each of a similar size to the Waimea Plains. This is a tiny proportion of the highly productive land when compared with other parts of New Zealand. Furthermore, greater than 20% of the Waimea Plains area is already lost for agricultural use through urban developments, infrastructure, etc. and this loss of productive land through urbanisation is continuing.”

The topic was recognised by the Mayor in 2016 in relation to PC 60, with the need to preserve high-quality land for high value food production. The S32 report for PC60 noted community feedback confirming the need for more effective protection. Some relevant extracts are:

- 1. 7 Economic growth is protected and supported by protecting the productive land resource and especially high value productive land for current and future protection.
- Changing rules about rural subdivision and land use to ensure greater protection of productive capacity.
- Productive activities are priority land use in rural production zones R1, R2 and R3 with high productive values.

Establishment of the proposed BDA incorporates 7 ha of Deferred residential zoned land being used for intensive wine production, and 11 ha of R1 pastoral land. Various references in the S32 Report dismiss the issue of protection of R1 highly productive soils using two reasons of the land being (i) fragmented in two titles and (ii) physical constraint between Pitfure, SH6 and residential; there is also (iii) an inference of flood hazard risk.

There are many smaller blocks of land being used for food production in the district with the clear example of the use in the adjacent vineyard. If this (i) fragmentation argument is adopted, it sets a precedent for much of the valuable Waimea Plains land already in small titles that would be precluded from future protection. It is interesting that this reasoning is not mentioned in S32 report 9.2 Evaluation.

The (ii) locality reference is puzzling as it can be applied to similar situations all over this relatively closely subdivided district. Any potential cross-boundary effects are already accepted through the adjacent vineyard operations. On the contrary, the locality with close access for supporting labour, transport and water sources makes it very suitable for food production.

Although the (iii) flood hazard risk is not adequately addressed in the S32 Report in relation to housing as it ignores history, such risk is less significant to food production than residential use that will require substantial land and building modifications.

The justification for including the R1 zoned land on the basis of the TRMP Policy 6.16.3.1 that relates to existing Rural 1 Deferred residential zoning is not relevant. The identification and description of other land having more productive capacity is not described or quantified.

S32 Report notes the upcoming National Policy Statement for Highly Productive Land that targets high-value Class 1 and 2 soils based on land use capability, and states that it has been considered in the proposed PC75. Although the S32 Report notes that the NPS-HPL is not currently in legal effect, Council has an obligation and an existing policy to address it in this proposed Plan Change. Although it is not applicable to R1 Deferred residential zone, it is directly relevant to the R1 balance of the proposed BDA. This R1 zoned land meets the criteria for highly productive land that, when considered in relation to the available district resource, and cannot be replaced on the scale proposed to be lost.

It is further contended that the proposed BDA has not incorporated the thinking behind what is now a government directive with superior authority over TRPS and TRMP provisions. The NPS-NPL requires Councils to manage this land to ensure that it is available for growing vegetables, fruit and other primary produce now and in the future to feed local people and for export. This proposed PC75 does not recognise this authority.

Government also requires Councils to proactively consider resources in a regional context, not just the local context that is addressed in this proposed Plan Change. This is particularly relevant to the very limited and already constrained area highly productive land.

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COVER SHEET

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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.

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

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Submitter Name: GARRICK BATTEN
(organisation/individual)

Representative/Contact:
(if different from above)

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64A Waimea West Road BRIGHTWATER 7022

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Email: caprinex@xtra.co.nz

Date: 14 October 2022 3 pages

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.: PC 75

Change Title/Subject: PROPOSED BRIGHTWATER DEVELOPMENT AREA

☑ 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

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

Submission on a Change to the Tasman Resource Management Plan

CONTENT SHEET

Sheet No.	1	of	3

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

OFFICE USE Submitter Number:

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

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- ☐ I **oppose** the Plan Change and seek that the Council **deletes** it in its entirety.
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OFFICE USE: Submission No.

Plan provision or map number(s): *State each specific provision (topic) number as addressed in the Plan Change*	The aspect of the provisions I support or oppose, together with reasons, are: *State the nature of each submission point and indicate whether you:* • *support or oppose the provision or wish to have it amended; and* • *the reasons for your view*	I seek that Council retains/deletes/replaces/amends the specific Plan Change provisions as follows: *For each submission point/provision number, state, **specifically,** what changes you would like to see.*
Example:		
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2.2.1.2 4.1.1.7 4.1.1.8 4.1.1.16 4.2.1 6.3.1 6.9 7.1.1 8.3 9.2 update map 75/2	see attached 2 pages	I seek that Council gives full and unbiased considertaion to NPS-NPL and provisions of the TRPS and TRMP and existing policies to protect highly productive land and deletes the propoosed land zoned R1 from the proposed Brightwater Development area.

tasman district council
Te Kaunihera o te tai o Aorere

Tasman District Council
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Website www.tasman.govt.nz
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New Zealand
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Fax 03 525 9972

15243 Hothouse Creative

Submitter # 4206

Received 17.10.22

55 Collingwood Street
Nelson 7010
New Zealand
www.nzta.govt.nz

Waka Kotahi NZ Transport Agency Reference: 2022-1436

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 75 - Brightwater

Attached is the Waka Kotahi NZ Transport Agency submission on the Proposed Plan Change 75 Brightwater by Tasman District Council.

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

If you have any questions, please contact me.

Yours sincerely

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 75 - Brightwater

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 Plan Change 75 Brightwater which seeks the inclusion of the Brightwater 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 Roading 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.

- Arataki[1] 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 Taiao[2] 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.

Waka Kotahi submitted on the NTFDS and were largely in support of the integrated and long-term approach to planning and general direction of the NTFDS, our key submission points, which relate to this plan change, were:

- 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;
- 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;
- 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. It is a limited access road under the Government Roading Powers Act 1989, with an Average Annual Traffic Count of 7,198 with 10% of those being heavy vehicles. The posted speed limit is 80km/hr and the topography is generally flat. Details are in section 13 below regarding potential impact on the SH6 intersection.

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

Although the Brightwater development would lead to significant effects on the local road network linking Brightwater 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 would like to thank the Council for their early engagement on some matters in the proposed plan change.

(ii) Waka Kotahi supports in part the proposed plan change adding Brightwater Development Area to the extent outlined in this submission, while expressing reservations over a lack of information in respect to effects from the development area on the Lord Rutherford Road and SH6 intersection. Waka Kotahi views on specific topics are set out in the following paragraphs. These views are supported by the text in Table 1, which outlines Waka Kotahi submission points where further information, clarification or a change in approach are sought. Table 1 also sets out submission points on specific provisions in the Plan Change.

Planned Land Use

(iii) Waka Kotahi supports planned land use development in appropriate areas integrated with key infrastructure such as transportation. Waka Kotahi considers this should occur in a manner which does not compromise the effectiveness, efficiency, resilience, and safety of the transport network. Although the plan change location could potentially support implementation of the Waka Kotahi 'avoid, shift, improve' sustainability action plan, and other key government policies such as the NPS-UD, there is currently not enough information for Waka Kotahi to support this plan change entirely. We support Council in considering the Emissions Reduction Plan (ERP) for the Brightwater development area and commend the Council's Walking and Cycling Strategy which seeks to build a separated cycleway for this area, providing a safe connection from the development to the town centre.

(iv) Tasman District Council is identified as a Tier 2 authority. Waka Kotahi provided feedback on the draft plan change which included expanding the urban area on the fringe of Brightwater, while still being close to the main street/services/infrastructure and having site specific rules for reverse sensitivity. In respect of Plan Change 75, Waka Kotahi is generally supportive of the proposed changes and provisions put forward by Council.

(v) The proposed plan change is seeking to encourage medium density housing by applying the Tasman Resource Management Plan's (TRMP's) existing Compact Density provisions to the site, with an additional non-notification provision to incentivise the use of the Compact Density provisions. Waka Kotahi considers that Council should take a long-term, enabling view of development in the residential zone and that this should be reflected in the densities proposed.

Nelson Tasman Future Development Strategy 2022-2052

(vi) Objective 1 and 3 in the NTFDS 2022-2052 seeks to achieve urban form supporting reductions in greenhouse gas emissions by integrating land use and transport and new housing is focused in areas where people have good access to jobs, services and amenities by public and active transport, and in locations where people want to live. Waka Kotahi supports greenfield development that is timed appropriately, staged with priority given to high density residential housing close to existing urban areas and the associated infrastructure and services. The NTFDS identified that the Council would need to encourage the development of a broader range of services in the Brightwater Centre to encourage more local trips. Waka Kotahi supports the continued strategic planning of the Brightwater area to support additional densities in the NTFDS and that form part of this plan change.

(vii) Waka Kotahi generally consider that the location is suitable for greenfield development as it is an extension of the existing urban area (Brightwater) and close to some existing infrastructure. Active transport links and planned public transport improvements to provide multi-modal connectivity are supported – subject to an integrated transport assessment being undertaken to determine if any intersection improvements at the intersection of SH6 and Lord Rutherford Road are required as a result of this development. Waka Kotahi consider that the development area generally aligns with the NTFDS. Brightwater was identified in the future development strategy as a suitable area for growth and that the growth should be supported by infrastructure, public transport, and active transport upgrades.

(viii) Waka Kotahi support the inclusion of the compact density provisions and enabling housing choice within the Brightwater Development Area, particularly given that it is located a walkable distance (maximum 1000m) from the town centre. This development gives an average density of approximately 15 dwellings per hectare, compare with the TRMP standard density provisions which gives an average density of approximately 13 dwellings per hectare. The site is also located within close proximity to the Tasman

Great Taste Cycle Trail which provides a predominately off-road cycle trail to Richmond and beyond. There is currently a bus route which runs to the Richmond town centre. This bus route includes stops in Brightwater. Council is proposing to introduce a new bus route which will run to Richmond and Nelson town centres. The bus route is proposed to run along Lord Rutherford Road adjacent to the proposed Brightwater Development Area. Waka Kotahi support these initiatives to strategically locate greenfield development and connect the area with existing active and public transport services. There will be connections available for residents to travel to local amenities, the city centre, and to surrounding urban areas, without using a motor vehicle. This supports emissions reductions target and MDRS targets.

(ix) Timing of any greenfield development in the Nelson Tasman region is critical to ensure that intensification of existing urban areas is attractive, affordable and the 'first stop' for provision of residential housing. Waka Kotahi acknowledge that intensification alone cannot meet the demand for housing in the region, therefore any 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.

Deferred zoning:

(x) 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 supports this approach with the amendment that it also be deferred until Council and Waka Kotahi are both satisfied with the transport related effects to the network – particularly any mitigation measures that may be required at the intersection of SH6 and Lord Rutherford Road.

The application of 'walkable and cycling distance'

(xi) 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 1000m walking catchment to the Brightwater town centre. We are also supportive of provisions providing for a walking and cycling connection to potential bus stop locations.

(xii) Timely provision of appropriate infrastructure to support safe transport options for all modes is extremely important, noting that active modes now also include micro-mobility such as e-scooters and powered wheelchairs and the introduction of e-bikes is a step change in infrastructure requirements and increases the speed, payload and usefulness of a bike.

Reverse Sensitivity (Noise and Vibration)

(xiii) Waka Kotahi support the inclusion of reverse sensitivity provisions in the TRMP that allow for a setback of at least 20m from the state highway's white edge line, and that require dwellings or altered habitable rooms within 100m of the state highway's white edge line to meet maximum indoor design noise level of 40dB to mitigate the noise effects from the state highway operation.

(xiv) Waka Kotahi considers that noise and vibration requirements support the rezoning by protecting the health and amenity of future residents who will live in the new dwellings. This is acknowledged in the section 32 report (see 2.2.1.6 and 4.1.19) and the Schedule of amendments (17.1.3.1(zd)).

State Highway 6 and Lord Rutherford Road intersection

(xv) Waka Kotahi supports in part the proposed plan change, subject to further detail on potential effects on the Lord Rutherford Road North and SH6 intersection. The proposed new road from the development connects to Lord Rutherford Road (connecting to Wanderers Avenue). Further assessment is required

relating to any potential cumulative traffic and safety impacts of this plan change in providing safe, multi-modal transport options, with particular regard to the Lord Rutherford Road / SH6 intersection.

- Financial contributions relating to points above may need to be considered should the plan change be approved and followed by resource consents for subdivision.
- Currently there is no provision for funding of a transport / safety related upgrade at this location in the National Land Transport Plan or the Regional Land Transport Plan.

(xvi) The plan change will enable a significant increase in users of the road network. Waka Kotahi recommends that an Integrated Transport Assessment is prepared that assesses the impacts on all modes at the intersection with the state highway and ensures safe provision for active transport users throughout Brightwater. A traffic impact assessment would also inform if any upgrades would be needed at the intersection and across the network. Waka Kotahi support the plan change subject to further assessment on intersection upgrades and requests involvement in further conversations about this intersection as required.

Multi-modal connectivity:

(xvii) Waka Kotahi supports the provision of a multi-modal transport network within the Brightwater 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 Brightwater should be prioritised.

Terminology – higher density:

(xviii) 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 Brightwater 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.

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

(i) The changes sought as outlined in our above submission points are made and Table 1 below.

(ii) An integrated traffic assessment is required to be undertaken at the resource consent stage to determine the effects of increased traffic (via active and private transport modes)– particularly at the intersection with Lord Rutherford Road and SH6. Residential zoning should be deferred to such time as appropriate upgrades to the intersection informed by the traffic assessment report and stormwater has been addressed.

(iii) Subject to the changes sought, Waka Kotahi are in support of the proposed 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 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

55 Collingwood Street
Nelson 7010
New Zealand
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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 Brightwater 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 *enabling medium density development in specified Development Areas, reflects the need to use land more efficiently where expansion does occur* as it aligns with the FDS.	Retain as notified
3	Urban Environment Effects	Chapter 6 6.1.1	**Neutral**		Retain as notified
4	Urban Environment Effects	Chapter 6 6.1.3.1 (j)	**Support in part**	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
5	Urban Environment Effects	Chapter 6 6.1.3.1A	**Support**	Support Brightwater being in the policy for medium density housing developments.	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 Brightwater as it is in line with the FDS 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 Brightwater 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, or higher density is clarified.	Change 'higher density' or clarify.
10	Land Effects from Urban Growth	Chapter 6 6.2.20.1 (a) and (b)	**Support**	Wording in line with the FDS 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	Retain as notified

				and active transport infrastructure in the future by concentrating population	
11	Land Effects from Urban Growth	Chapter 6 6.2.20.1 (ba)	**Support**	This is in line with the FDS 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 Brightwater. 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 Brightwater Development Area.	Retain as notified
14	Brightwater	Chapter 6 6.16.1.2A	**Support in part**	Support the issue 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	Brightwater	Chapter 6 6.16.1.7	**Support**	The council / developer would have to work closely with Waka Kotahi to ensure a safe and appropriate noise attenuating structure was in place alongside the state highway to protect the future residents from noise / health effects.	Retain as notified
16	Brightwater	Chapter 6 6.16.3.1	**Support**	In line with the FDS that greenfield land is used efficiently for a mix of uses at medium and higher densities, to reduce pressure on further greenfield expansion in the long term.	Retain as notified
17	Brightwater	Chapter 6 6.16.3.1A	**Support in part**	Support the intent of the policy, however Waka Kotahi consider 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	Brightwater	Chapter 6 6.16.3.1B	**Support in part**	Support the intent of the policy, however Waka Kotahi consider 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.
19	Brightwater	Chapter 6 6.16.3.3A	**Support in part**	Waka Kotahi consider the flood hazard will need to be mitigated to allow this growth area to be developed so flooding does not affect the SH6 network.	Waka Kotahi and TDC continue to work together
20	Brightwater	Chapter 6 6.16.3.8	**Support**	Support the policy in regard to reverse sensitivity particularly mitigation methods at the time of subdivision and building	Retain as notified
21	Brightwater	Chapter 6 6.16.20.1 (e)	**Support in part**	Support rules to provide for a variety of lot sizes however Waka Kotahi consider 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.

22	Brightwater	Chapter 6 6.16.20.1 (f)	**Support in part**	Support rule to manage road noise however Waka Kotahi consider it should be worded as reverse sensitivity so that vibration is also included in the definition.	Change road noise to reverse sensitivity.
23	Brightwater	Chapter 6 6.16.30	**Support in part**	Support the wording included in the explanation to retain land as rural or recreational where flood effects cannot be managed. Change higher density to or clarify that it is not high-density housing. The explanation is in line with what the FDS says.	Change 'higher density' or clarify.
24	General Rules	Chapter 16.3 Subdivision 16.3.3.1 (a)	**Support**	In line with the FDS	Retain as notified
25	General Rules	Chapter 16.3 Subdivision 16.3.3.1 (i) and (m)	**Support**	Support the inclusion of Brightwater in these rules.	Retain as notified
26	General Rules	Chapter 16.3 Subdivision 16.3.3.1 (me)	**Support in part.**	Support the rule regarding reverse sensitivity, however, consider that our vibration standard should also be included.	Add: *New buildings or alterations to existing buildings containing noise sensitive activities, in or partly within 40 metres from the state highway edgeline must be designed, constructed and maintained to achieve road-traffic vibration levels complying with class C of NS 8176E:2005*
27	General Rules	Chapter 16.3 Subdivision 16.3.3.1 (n)	**Support**	Support the inclusion of Brightwater Development Area in this rule as this aligns with the FDS. Support the rule that no road in the Brightwater Development Area is to connect to SH6 and no direct access to allotments from SH6.	Retain as notified
28	General Rules	Chapter 16.3 Subdivision 16.3.3.1 (o)	**Support in part**	Support the rule regarding noise and vibration however consider 'manage' to not be a strong enough word and 'mitigate' should replace it.	Replace 'manage' with 'mitigate'.
29	General Rules	Chapter 16.3 Subdivision 16.3.3.1B	**Support**	Support the rules as aligns with the FDS.	Retain as notified

30	General Rules	Chapter 16.3 Subdivision 16.3.3.2A	**Support**	Support the rules as aligns with the FDS.	Retain as notified
31	General Rules	Chapter 16.3 Subdivision 16.3.3.2C	**Support**	Support the Restrict Discretionary Status and rules.	Retain as notified
32	General Rules	Chapter 16.3 Subdivision 16.3.3.3	**Support**	Support the inclusion of Brightwater. Support rule (j) that no direct access is gained via SH6. Support rule (vi) as it addresses reverse sensitivity.	Retain as notified
33	General Rules	Chapter 16.3 Subdivision 16.3.3.3 (32A)	**Support in part**	Support the intention, however Waka Kotahi consider 'manage' to not be sufficient and request 'mitigate' replace it.	Replace 'manage' with 'mitigate'.
34	General Rules	Chapter 16.3 Subdivision 16.3.3.4	**Support**	Support the Restrict Discretionary Status and rules.	Retain as notified
35	Zone Rules	Chapter 17 17.1.3.1	**Support**	Support the inclusion of reverse sensitivity provisions for the construction or alteration of a building	Retain as notified
36	Zone Rules	Chapter 17 17.1.3.2 (e)	**Support**	Support the inclusion of reverse sensitivity provisions and matters of control.	Retain as notified
37	Zone Rules	Chapter 17 17.1.3.2 (n) and (12)	**Support**	Support the inclusion of reverse sensitivity provisions	Retain as notified
38	Zone Rules	Chapter 17 17.1.3.4B	**Support**	Support the inclusion of reverse sensitivity provisions and providing for a variety of housing density options.	Retain as notified
39	Zone Rules	Chapter 17	**Support**	Support the inclusion of Brightwater and noise provisions. Support the inclusion of Brightwater Development Area in the planning maps	Retain as notified
40	Zone Rules	Chapter 17 17.14A	**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 Lord Rutherford Road	Also defer until Council and Waka Kotahi are both satisfied with the transport related effects – particularly the intersection of SH6 and Lord Rutherford Road
41	Information required for land use or subdivision	Chapter 19 19.2.2	**Support**	Support the further information request, in particular the reverse sensitivity and information on how a variety of housing options, including higher density housing options, is achieved, or – where this is not practicable – justification of why.	Retain as notified

	consent applications				
42	Urban Design	Part 11- Appendix 2 Urban Design Guideline	**Support**	Support the inclusion of Brightwater and the provisions or a variety of lot sizes, increased density, and a quality living environment.	Retain as notified

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

OFFICE USE

Date received stamp:

Further Submission Received:
Thursday 10.11.2022
Further Submitter Number:
PC76.2782.1

Initials: NJA

Submitter No.

tasman district council | Te Kaunihera o te tai o Aorere

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

Note:

1. This form is only for the purpose of supporting or opposing original submissions. It is NOT for making an original submission to the Plan, or for making a submission on a resource consent or on Council's Annual Plan.
2. You may only make a further submission if you or your organisation complies with the requirements below.

   Tick to show that you or your organisation is:

   ☐ A person representing a relevant aspect of the public interest.

   ☐ A person who has an interest in the proposed Plan Change greater than the general public.

Submitter Name: Hermann and Agnes Seifried
(organisation/individual)

Representative/Contact:
(if different from above)

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Fax:

Email: hermann@seifried.co.nz

Date: 09/11/2022

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

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

Signed: H. Seifried

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.: 75

Change Title/Subject: Growth Plan Change 75 - Brightwater

■ Tick if you wish to be heard in support of your further submission.

■ Tick if you would be prepared to consider presenting your submission in a joint case with others making a similar submission at any hearings.

Remember:

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

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

CONTENT SHEET

COMPLETE AS MANY CONTENT SHEETS AS REQUIRED AND ATTACH WITH ONE COMPLETED COVER SHEET

Sheet No.	

(Please tick one)	Original Submitter Opposed or Supported:		
☐ I/We SUPPORT the original submission of Or ☒ I/We OPPOSE the original submission of	Name: Garrick Batten Address: 34 Main Road Spring Grove RD1 Brightwater, Nelson, 7091		
Change No. [e.g. C15]	Original Submitter and Submission Point Nos [e.g. C15.2659.2 – .6]	Topic Number [Tasman Resource Management Plan provision, e.g. 31.4.6 or Schedule 31.1C]	Further Submission No. **OFFICE USE ONLY**
C75	75.0.2-1; 75.0.3-1	Productive land; Natural Hazard	FC

Reasons for Support or Opposition:

Do not agree that the plan change is inappropriate in relation to the issue of loss of productive land, and do not consider that the plan change is inconsistent with the NPS-HPL.

Do not consider that the plan change is inappropriate in relation to flooding hazards. This issue is appropriately addressed through a resource consent process.

(Please tick one)	Original Submitter Opposed or Supported:		
☑ I/We SUPPORT the original submission of Or ☐ I/We OPPOSE the original submission of	Name: Seafmid Address:		
Change No. [e.g. C15]	Original Submitter and Submission Point Nos [e.g. C15.2659.2 – .6]	Topic Number [Tasman Resource Management Plan provision, e.g. 31.4.6 or Schedule 31.1C]	Further Submission No. **OFFICE USE ONLY**
			FC

Reasons for Support or Opposition:

tasman district council
Te Kaunihera o te tai o Aorere

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