



Tasman Resource Management Plan

Growth Plan Change 78 – St. Arnaud

Notified: 16 September 2022

Original Submissions Received: October 2022



17 October 2022

Tasman District Council

Email – tasmanrmp@tasman.govt.nz

To whom it may concern,

SUBMISSION ON PLAN CHANGE 78 TO THE TASMAN RESOURCE MANAGEMENT PLAN

Please find attached a submission on behalf of the Director-General of Conservation in respect of Plan Change 78 to the Tasman Resource Management Plan – Growth St Arnaud.

The Director-General is supportive of the proposed rezoning of the subject land on Massey Street, St Arnaud to a new Papakāinga Zone. The attached submission provides some further detail on the basis for supporting this proposed plan change.

If you have any questions or would like to discuss this submission, please contact Geoff Deavoll on 027 536 7020 or gdeavoll@doc.govt.nz

Ngā mihi,

A handwritten signature in blue ink, appearing to read 'J. Wotherspoon'.

John Wotherspoon
Pou Matarautaki, Operations Manager
Nelson Lakes
Department of Conservation

Form 5: Submission on notified proposal for policy statement or plan, change or variation

Pursuant to clause 6 of the First Schedule of the Resource Management Act 1991

To: Tasman District Council (**the Council**)

Name of submitter: Director-General of Conservation (the **Director-General**)

1. This is a submission on plan change 78 to the Tasman Resource Management Plan (TRMP).
2. I could not gain an advantage in trade competition through this submission
3. I **seek** that the Council make plan change 78 as notified.
4. Specific changes that I support are the additions to Chapter 6 Urban Environment Effects of the TRMP, including new policy 6.13.3.11A, new method of implementation 6.13.20.3 and the additions to the explanation regarding St Arnaud and change to reflect the proposed new zoning in the planning maps.
5. The decision sought in this submission is required to ensure that the zoning of the subject land at Massey Street, St Arnaud is consistent with the intended future development and use of the site. As detailed in the section 32 report, plan change 78 proposes a change to the zoning for the property from the current Conservation zone to Papakāinga Zone. The site is an amalgamation of land returned to iwi under the treaty settlement and conservation area acquired through a land exchange with the Department of Conservation. The change in land zoning will enable the aspirations of the Ngāti Apa ki te Rā Tō Trust for development of the site.
6. While the site is presently dominated by indigenous vegetation, this vegetation is regenerating common vegetation type and not considered to be significant or a critical habitat for any species and is therefore unlikely to require protection as a matter of national importance pursuant to section 6(c) of the RMA.
7. I do not wish to be heard in support of my submission

John Wotherspoon

Pou Matarautaki, Operations Manager Nelson Lakes

Department of Conservation

Acting pursuant to delegated authority on behalf of Penny Nelson, Director-General of Conservation

17 October 2022

Note: A copy of the Instrument of Delegation may be inspected at the Director-General's office at Conservation House Whare Kaupapa Atawhai, 18/32 Manners Street, Wellington 6011

Address for service:

Attn: Geoff Deavoll, Planner

Email: gdeavoll@doc.govt.nz

Ph: 0275367020

Department of Conservation

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.

Submitter Name: Ngāti Apa ki te Rā Tō Charitable Trust
 (organisation/individual)

Representative/Contact: Rowena Smith, General Manager
 (if different from above)

Postal Address:

POBox 708
 Blenheim 7240

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

Phone: 0800 578 900

Fax:

Email: 027 296 6857

Date: 14 October 2022

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.: 78

Change Title/Subject: St Arnaud Papakāinga Zone

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

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:

Initials:

Submitter No.

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

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.

of

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.
 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): <i>State each specific provision (topic) number as addressed in the Plan Change</i>	The aspect of the provisions I support or oppose, together with reasons, are: <i>State the nature of each submission point and indicate whether you:</i> • 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: <i>For each submission point/provision number, state, specifically, what changes you would like to see.</i>
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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:
Submission No.



Te Kaunihera o
te tai o Aorere

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

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

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

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

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



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

Waka Kotahi NZ Transport Agency Reference: 2022-1442

17 October 2022

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

Via email: tasmanrmp@tasman.govt.nz

Dear Sir/Madam,

Submission on Tasman District Council Proposed Plan Change 78 - St Arnaud

Attached is the Waka Kotahi NZ Transport Agency submission on the Proposed Plan Change 78 St Arnaud by Tasman District Council.

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 long horizontal flourish at the end.

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

Telephone Number: 021 220 8608

E-mail: lea.osullivan@nzta.govt.nz

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

Submission on Tasman District Council Proposed Plan Change 78 - St Arnaud

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 a submission on the Tasman District Council's (Council) Proposed Plan Change 78 St Arnaud to rezone a parcel of land at Massey Street, St Arnaud from Conservation to Papakāinga Zone.

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

5. Nelson Tasman Future Development Strategy 2022-2052

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/>

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 63 (SH63) in this area is considered a secondary collector under the One Network Road Classification. SH63 at this location has an Average Annual Traffic Count of 874, 13% of which are heavy vehicles, and has a posted speed limit of 50km/hr.

The St Arnaud Papakāinga Zone Proposed Plan Change (proposed plan change) area accesses SH63 via Kerr Bay Road. This intersection includes a right turn bay and has had no reported crashes in the last five years.

7. The submission of Waka Kotahi is:

Overall, Waka Kotahi supports the proposed Plan Change.

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. Waka Kotahi also supports enabling Papakāinga development to provide for the aspirations of tangata whenua in a manner consistent with tikanga and for a range of traditional, spiritual, and cultural activities.

The Nelson Tasman Future Development Strategy (NTFDS) 2022 indicates a small site in Massey Road for residential development nearer the town centre (identified as 'T-195'). The proposed plan change aligns with the NTFDS as the area being rezoned from Conservation to Papakāinga Zone is within the area marked for future development. Waka Kotahi supports the alignment of the proposed plan change with the NTFDS.

Waka Kotahi submits that the future inhabitants of the proposed zone would be better supported if there was more explicit consideration and provision for active transport and accessibility in the Site Development Plan requirements for the site.

The overall requirement for a Site Development Plan to be submitted to Council is an approach that Waka Kotahi supports as it means that the servicing of the site is considered as an integrated whole. However, Waka Kotahi note that there is insufficient consideration of accessibility and alternate modes of transport in the Site Development Plan requirements. Greater provision / requirement should be made for alternate modes due to the activities permitted on site including community activities such as educational and health facilities, churches, and community centres, as well as kaumatua flats. The age and type of movement of these potential users means that provision for non-vehicular transport is even more important.

However, given the small size of the land to be rezoned, distance from SH63 and the lack of scope to expand the information requirements of the Site Development Plan for land in the Papakāinga Zone throughout the region, Waka Kotahi are not seeking changes via proposed Plan Change 78.

8. Waka Kotahi does not wish to be heard in support of its submission.

9. 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
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