

Tasman Resource Management Plan

**Proposed Plan Change 76:
Wakefield – Residential Growth**

Section 32 Evaluation Report

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1. Executive Summary

The purpose – and therefore the objective – of Plan Change 76 ('this Plan Change') is to provide additional land for residential housing and encourage both intensification and a variety of densities within an identified site in Wakefield (the proposed 'Wakefield Development Area'). This is responding to issues around the need to provide for population growth, the need to manage housing affordability and the need to provide a variety of lot sizes to cater for different demographics and ensure efficient land use. In order to address these issues, this Plan Change is seeking to rezone and change applicable rules for an area of land identified in the Future Development Strategy 2022 and to encourage medium density¹ housing in this area and the adjoining area of undeveloped Residential zoned land.

Medium density housing will be encouraged within the proposed Wakefield Development Area by applying the Tasman Resource Management Plan's (TRMP's) existing Compact Density provisions to the site, with an additional non-notification provision. This is considered to be the most appropriate method of encouraging intensification as it uses existing provisions in the TRMP (ensuring consistency) and introduces a non-notification provision.

This Plan Change is also seeking to require a minimum development yield and variety of section sizes when subdividing sites greater than 2 hectares. This is achieved by requiring a percentage of allotments to be smaller than standard residential allotments within the Wakefield Development Area. This approach is intended to ensure that a variety of lot sizes are achieved.

In order to enable medium density development in the proposed Wakefield Development Area, key constraints such as flood hazard from Pitfure Stream, dam break hazard in the north-eastern corner of the site, and stormwater management will need to be addressed at the subdivision stage. This Plan Change includes provisions relating to these matters, to ensure that they are appropriately managed at the time of consenting and development.

2. Overview and Purpose

2.1 Purpose of Section 32 RMA

The fundamental purpose of Section 32 of the Resource Management Act 1991 (RMA) is to ensure transparent, robust decision-making in the development of plans, plan changes and policy statements. This includes the use of sound evidence and rigorous analysis, which in turn leads to robust and enduring provisions.

This Section 32 report is intended to clearly and transparently communicate the reasoning behind plan provisions to decision makers, the public and future plan users. The effects of new policies and rules on the community, the economy, and the environment is clearly identified and assessed during this evaluation. This becomes an enduring document recording the rationale and thinking behind the provisions. It tells the story of why the provisions are the most appropriate way to achieve the purpose of the RMA.

Tasman District Council ('Council') is required to undertake an evaluation of any proposed plan provisions before notifying those provisions. The Section 32 evaluation report provides the

¹ *Medium Density, as defined in the Tasman Resource Management Plan – 'means residential development with a dwelling density between 20 – 30 dwellings per hectare on sites averaging between 200 – 300 square metres in extent, including Compact Density, Comprehensive and Intensive housing development.'*

reasoning and rationale for the proposed provisions and should be read in conjunction with those provisions.

2.2 What are the Proposed Changes?

2.2.1 Status Quo

In order to understand the changes proposed in this Plan Change, it is necessary to first understand the site and the existing planning provisions that apply. This section outlines the site's existing zoning, and what is allowed for if the status quo is retained (i.e., if the proposed provisions of this Plan Change are not adopted).

The Plan Change site is a parcel of land, approximately 33 hectares in area, located on the south-eastern urban fringe of Wakefield. It is located between Pitfure Road, State Highway 6 to the north, Edward Street to the south, and Higgins Road/ The Great Taste Trail, and is dissected by Pitfure Stream. The Plan Change site boundaries are approximately shown below along with the existing zoning.

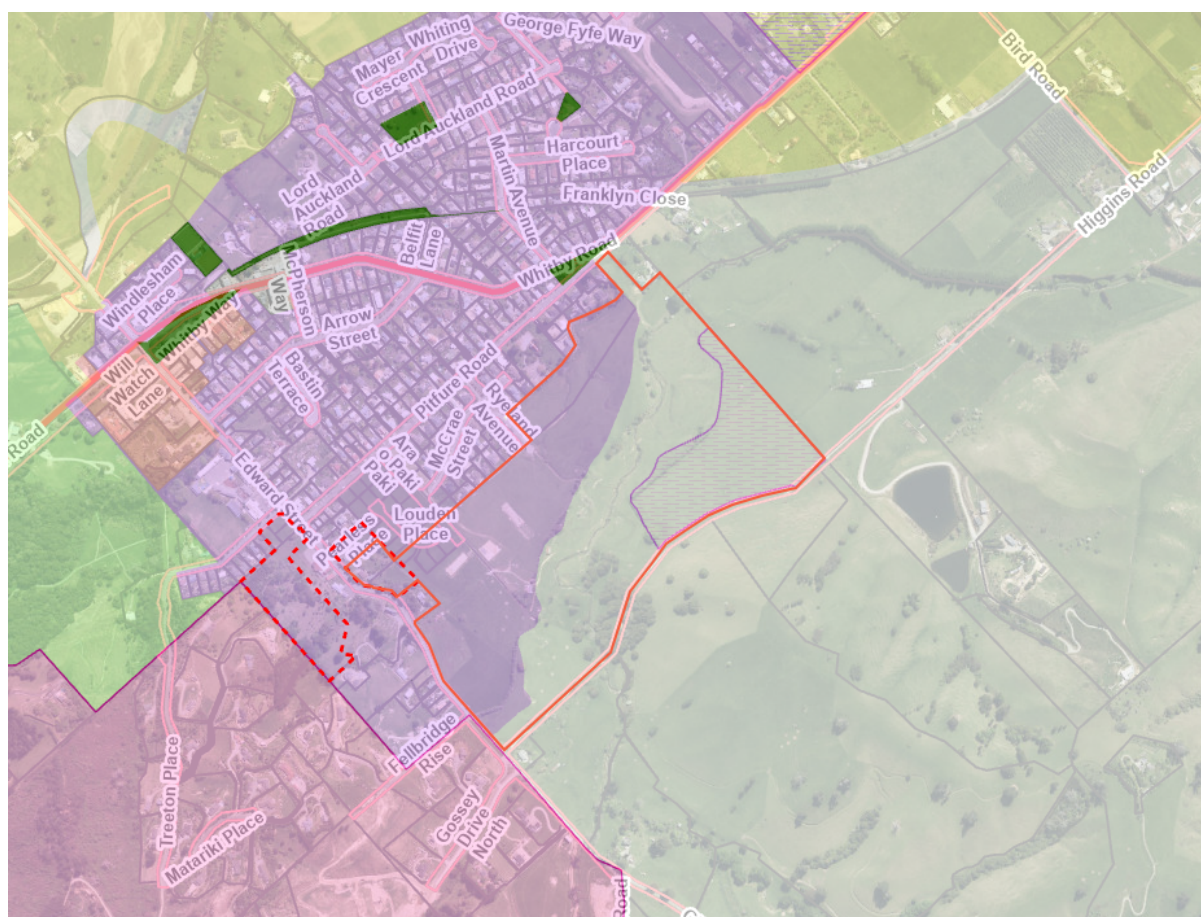


Figure 1: Plan Change Site and Existing Zoning (White = Rural 2, Purple = Residential, Purple Hatching = Rural 2 deferred Rural Residential)

The site comprises of:

- Residential zoned land on the north-western side of the site.

Under this existing operative zoning, this portion of the site is able to be developed in accordance with the standard density residential development provisions. This includes being able to construct a single residential dwelling on each site as a permitted activity (TRMP Rule 17.1.3.1), and a minimum lot size of 450m² for subdivision to occur as a

controlled activity (TRMP Rule 16.3.3.1). The Residential Zone rules also allow for Comprehensive Development land use (being the construction of three or more dwellings per site) to occur with a restricted discretionary activity status (TRMP Rule 17.1.3.4A) or higher.

- Rural 2 zoned land, immediately either side of Pitfure Stream.

Under this existing operative zoning, it is permitted to construct a single residential dwelling per site (TRMP Rule 17.6.3.1(c)), and a minimum allotment size of 50 hectares (TRMP Rule 16.3.6.1(a)) applies for subdivision as a controlled activity.

- ‘Rural 2 deferred Rural Residential’ land, in the north-eastern corner of the site.

The Rural Residential zoning of this portion of the site is deferred subject to *‘Higgins Road upgrade south of the Pitfure Bridge to ensure access in a Q100 event; and pedestrian/cycle link over the Pitfure Stream to Ryeland Avenue’*². As the situation currently stands, once these services are provided and the deferral is uplifted, this portion of the site would be able to be developed in accordance with the Rural Residential zone provisions. This allows for a single residential dwelling to be constructed per site as a permitted activity (TRMP Rule 17.8.3.1(a)). For subdivision to occur as a controlled activity, a minimum allotment size of 5,000m² applies if reticulated wastewater is not provided, or of 1,500m² if reticulated wastewater is provided (TRMP Rule 16.3.8.1(a)). In the interim (while the deferral is in place), this site is subject to the Rural 2 zone provisions, outlined above.

2.2.2 Re-Zoning

This Plan Change seeks to rezone the Rural 2 and ‘Rural 2 deferred Rural Residential’ portions of the Plan Change site to ‘Rural 2 deferred Residential’. This area is based on the Future Development Strategy 2022 ‘T-107 Edward Street’ site (Figure 2) which is identified for residential expansion.

² TRMP Schedule 17.14A

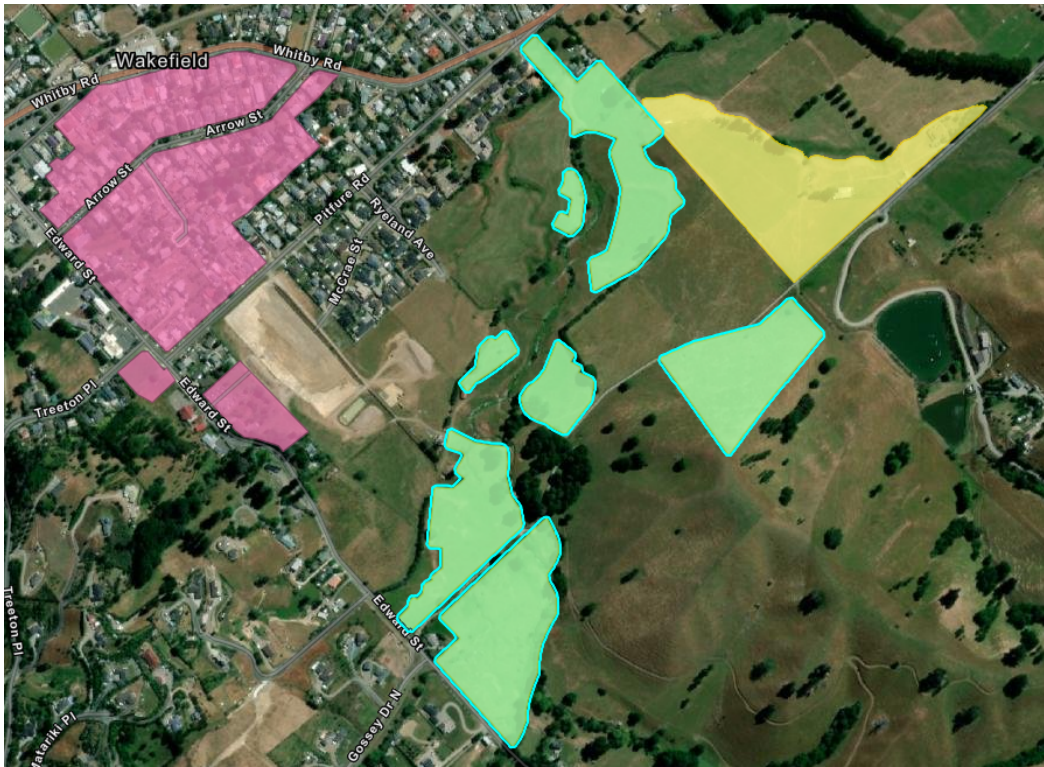


Figure 2: Future Development Strategy 2022 'T-107 Edward Street' Site (shaded green)

The proposed changes to the existing Tasman Resource Management Plan (TRMP) zone map are depicted in Figure 3.

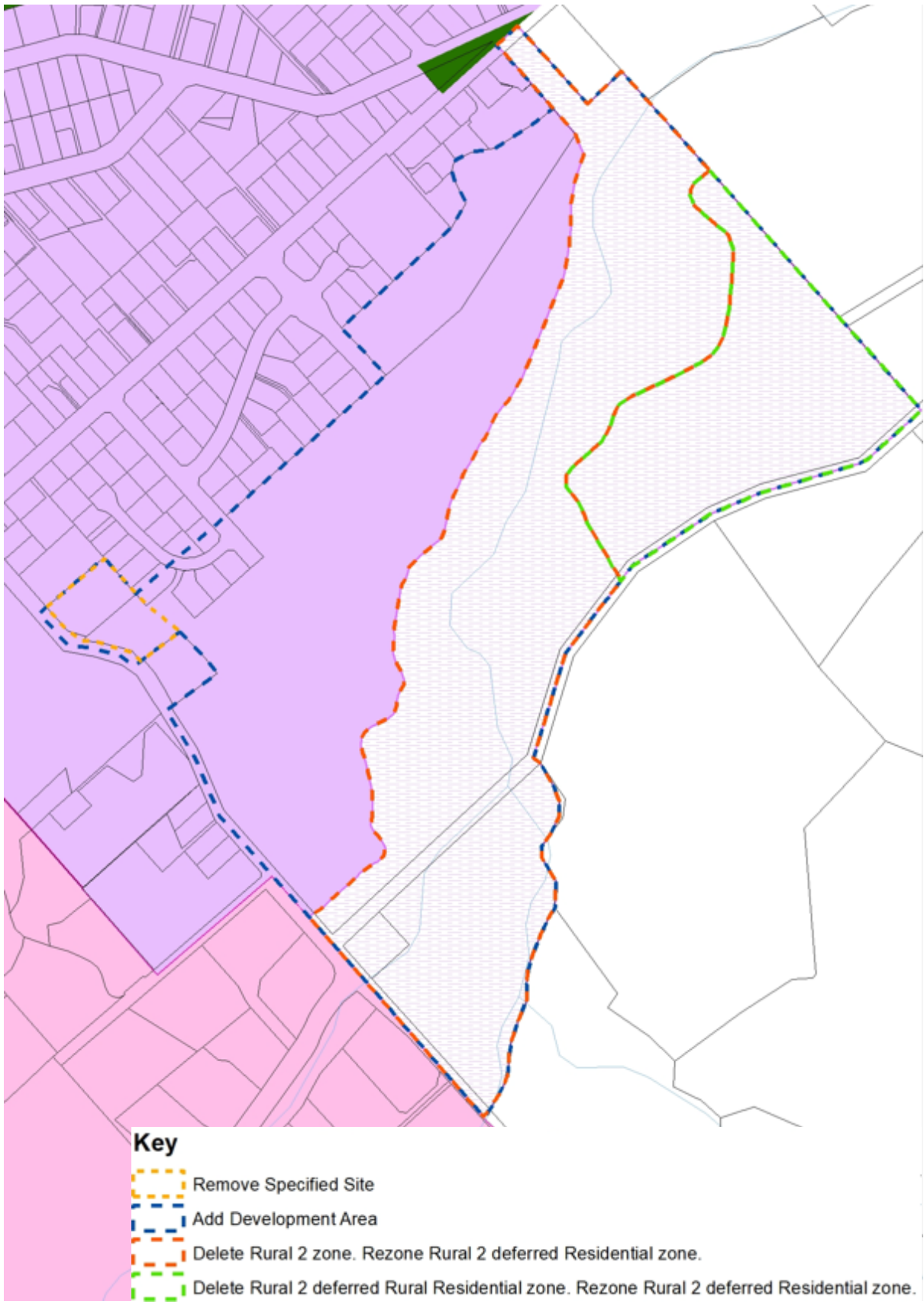


Figure 3: Proposed Re-Zoning - Wakefield Development Area (extract from Update Map 76/2)

The Plan Change site is located approximately 600-1,350m away from the Wakefield Town Centre, meaning that there is the potential to create a walkable/ cyclable neighbourhood in this area, where future residents would be able to walk or cycle into the town centre.

Key constraints include flood hazard, a dam break hazard in the north-eastern corner of the site and stormwater, which – based on advice from relevant Council staff – are sufficiently understood to enable the rezoning and can be managed satisfactorily at the time of the subdivision. Deferral of the residential zoning will ensure that the required services will be provided before the proposed Residential zoning becomes active.

2.2.3 Development Area and Compact Density Provisions

This Plan Change is also seeking to create a new development area, entitled the ‘Wakefield Development Area’, comprising of the land that is proposed to be re-zoned and the adjoining undeveloped Residential zoned area. The Wakefield Development Area is depicted in Figure 3 above.

This Plan Change is seeking to apply the TRMP’s existing Compact Density provision to the Wakefield Development Area with the addition of a non-notification provision applying to this activity. This is to enable and encourage a degree of medium density development within the Wakefield Development Area.

It is considered to be appropriate to apply a non-notification provision to encourage Compact Density Development. This is because the structure of Compact Density Development rule 17.1.3.3 g) means that Compact Density Development along the external boundaries of the proposal site must meet the standard permitted activity bulk and location criteria (including building height, boundary setback distance, and daylight admission) in the TRMP, unless the land adjoining the specific boundary is also a Compact Density Development. Therefore, any properties outside of the Compact Density Development will not experience a change in terms of the bulk and location of buildings from what could be developed under a permitted activity scenario in the Residential Zone.

2.2.4 Mandatory Requirement for Smaller Lots

This Plan Change is also seeking to require a percentage of allotments to be smaller than standard residential allotments for the subdivision of sites greater than 2 hectares within the Wakefield Development Area. Specifically, it is sought that, (except for Compact Density Development) for the subdivision of parent titles greater than 2 hectares:

- A minimum of 20% of the lots created must have a net area between 270m² and 350m²;
- A minimum of 20% of the lots created must have a net area between 350m² and 450m²;
and,
- A minimum of 50% of the lots created must be standard residential density (i.e., a minimum net area of 450m²).

The remaining 10% of the lots created can be comprised of any of these densities, or a mixture of all three.

The resulting density achieved using these requirements is approximately 15 dwellings per hectare as opposed to approximately 13 dwellings per hectare for standard residential development. The overall minimum potential housing yield in the Wakefield Development Area is approximately 495 dwellings. This approach is about creating a variety of lot sizes and resulting housing opportunities. Enabling the use of Compact Density provisions (see Section 2.2.3) is about increasing density in the Wakefield Development Area.

This proposed approach of requiring a certain percentage of different sized lots for subdivision of a site greater than 2 hectares in net area ensures that a variety of lots sizes are achieved. Provisions have also been included to ensure that the development of smaller lots in the Wakefield Development Area achieves good urban design outcomes in accordance with the Urban Design Guide (TRMP Part II, Appendix 2).

For the subdivision of sites that have a net area of 2 hectares or less, the standard density minimum allotment size of 450m² would apply. This is to acknowledge that it may be difficult to achieve the specified quotas when subdividing smaller parent titles and that enforcing these quotas for smaller sites could result in poor design outcomes and have unintended consequences.

The proposed allotment size criteria will not apply to development under the TRMP's Compact Density Provisions.

2.2.5 Indicative Items

The proposed Wakefield Development Area includes an existing indicative road (providing connectivity within the existing Residential zoned portion of the site between Pitfure Road and Edward Street) and two existing indicative walkways (connecting the indicative road to Pitfure Road and to Higgins Road). These TRMP existing indicative items are depicted in Figure 4.

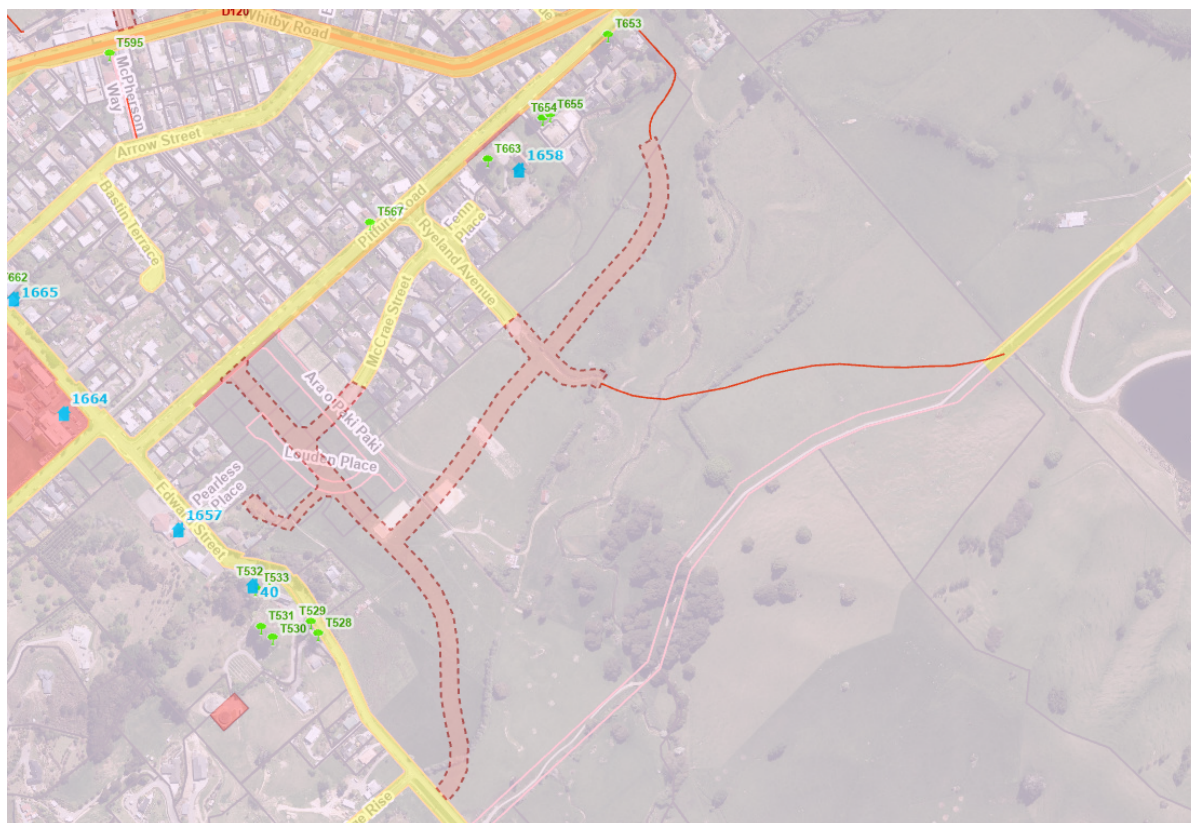


Figure 4: TRMP Existing Indicative Items

In order to manage future development of the proposed Wakefield Development Area, the following changes to the TRMP indicative items are proposed:

- A new indicative road, connecting the existing indicative road to Higgins Road and to the adjoining land to the north-east.
 - The connection to Higgins Road is to ensure that emergency vehicle access to the proposed Wakefield Development Area is available via Higgins Road.

- The connection to the adjoining land to the north-east is to provide a connection to the Future Development Strategy 2022 T-194 Whitby Road site.
- A realignment of the existing indicative walkway that connects the existing indicative road to Pitfure Road at the north-western end of the site. This realignment is proposed to accommodate the new indicative road described above.
- A new indicative reserve running along either side of Pitfure Stream. This indicative reserve is intended to ensure that development is setback from Pitfure Stream, to help accommodate flood flows and improve ecology within and adjacent to the stream. It is also intended to ensure that there is access to Pitfure Stream, for public amenity, recreation, connection to the waterway, and stream maintenance purposes.

This new indicative reserve is extended in an area along the south-eastern site boundary (around an existing cluster of trees) and again further north to provide for neighbourhood parks or green space.

- A new indicative reserve around an existing oak tree, near the south-eastern site boundary, and a new indicative walkway connecting this reserve to Higgins Road.
- An existing indicative walkway from Ryeland Avenue to Higgins Road is retained as it is a desirable future connection. However, it is expected that this connection may be achieved through the future internal road network and stormwater flow paths, rather than cutting diagonally across the site.

The proposed changes to the existing TRMP area map are depicted in Figure 5.

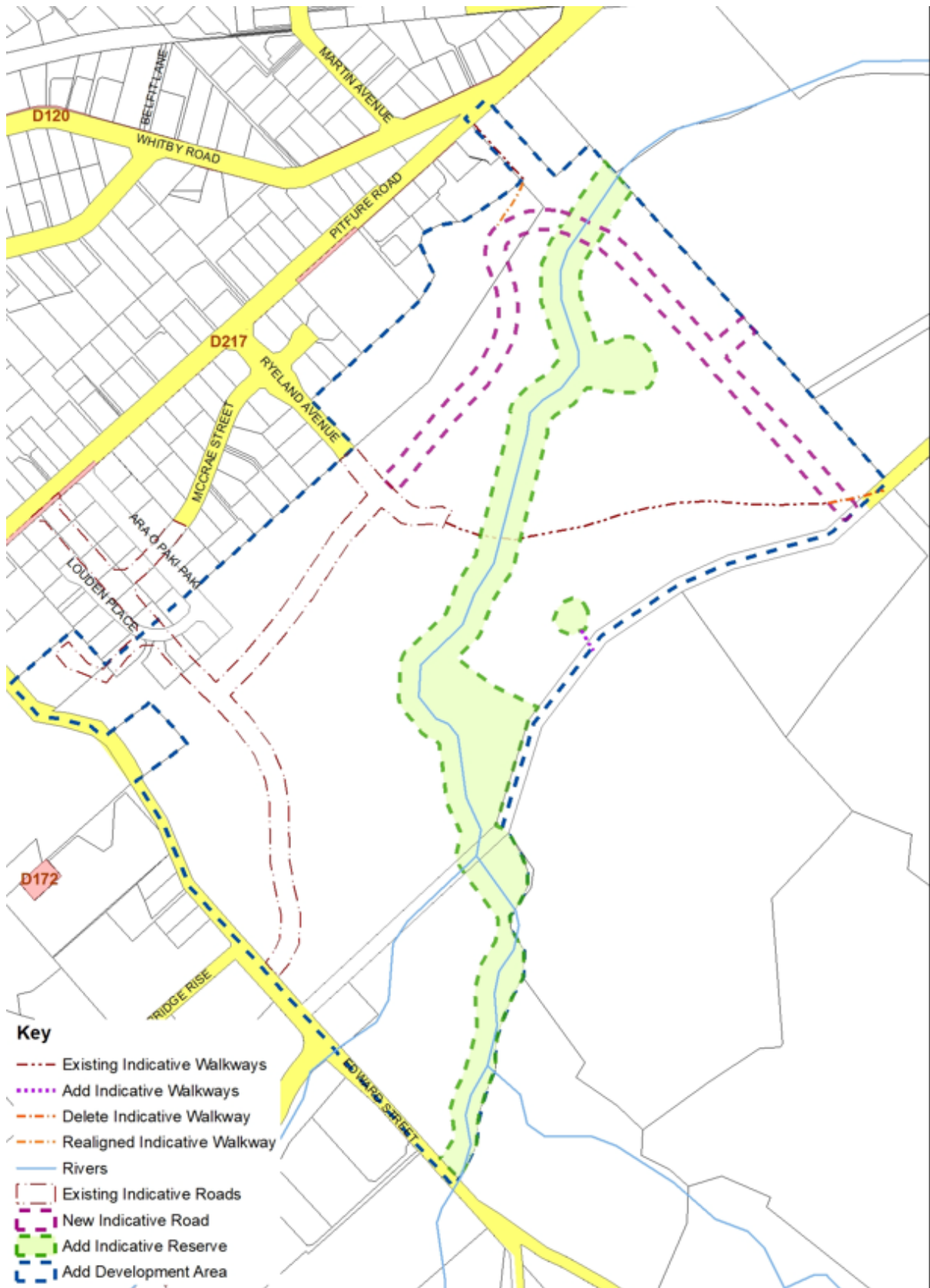


Figure 5: Residential Growth Area - Proposed Indicative Items (extract from Update Map 76/1)

2.2.6 Fire Sensitive Area Overlay

The TRMP includes existing provisions to manage potential adverse amenity effects from the discharge of contaminants from outdoor burning. This is managed through rules that apply to the Fire Sensitive Area overlay, which generally aligns with Residential zoning in the district.

In order to manage potential adverse amenity effects and to be consistent with the existing TRMP format, it is proposed that the Wakefield Development Area be a deferred Fire Sensitive Area. This is an extension of the overlay which already applies to the remainder of the Wakefield Township. This proposed change is depicted in Figure 6.

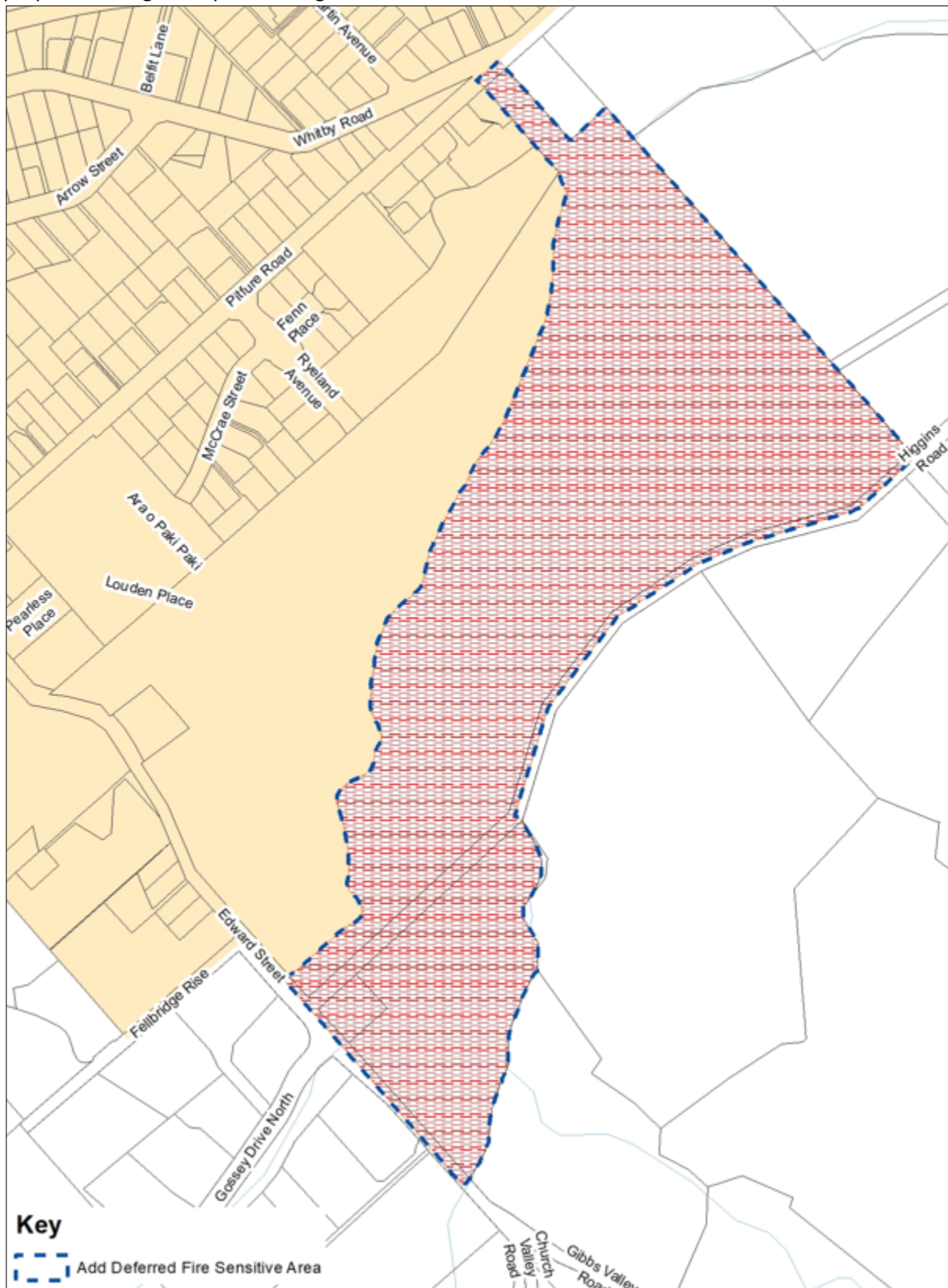


Figure 6: Proposed Change to TRMP Map 273 (extract from Update Map 76/3)

2.3 What are the Key Reasons for the Change?

This Plan Change is responding to the housing shortage currently being experienced throughout New Zealand and high demand for housing in the Tasman District. This is a significant issue in the Tasman District, which was recently found in July 2021 to be the fourth least affordable district to buy a house in (equal with Auckland)³ and in March 2022 to be the third least affordable district to buy a house in (with only Auckland and Bay of Plenty being less affordable).⁴

Tasman District Council has identified a number of issues that warrant the need for this Plan Change, including:

- The need to provide enough zoned and serviced land to provide for expected population growth (a requirement under the National Policy Statement on Urban Development 2020). This includes catering for a projected 535 additional people in Wakefield between 2021 and 2031 (assuming a medium growth scenario).⁵
- The need to address residential land supply and housing affordability issues, with evidence showing that the release of greenfields land is needed to help manage house prices.⁶
- The need to provide a variety of housing options, including higher density options, to cater for a varying of demographics and make efficient use of land.

These issues are discussed in more detail in Section 4.1.

3. Information Sources and Consultation

3.1 Information Sources

The following information sources have been used by Council to understand the issues and develop the options, and have helped to inform the proposed content of this proposed Plan Change:

- The Future Development Strategy 2022, including supporting documentation. This information is available on Council's website: <https://www.tasman.govt.nz/my-council/key-documents/more/future-development-strategy/>.
- The Long-Term Plan 2021-2031, including growth projections and planned infrastructure works. This information is available on Council's website: <https://www.tasman.govt.nz/my-council/key-documents/long-term-plan/long-term-plan-2021-2031/>.
- A 2020 report prepared by Sense Partners, entitled 'Understanding the impacts of releasing greenfield sites for development' attached in Appendix 1.
- A 9 May 2022 memo prepared by Dr Kirdan Lees of Sense Partners, entitled 'Review of selected submissions on the Nelson-Tasman Future Development Strategy'.
- A 2021 report by M.E. Consulting, entitled 'Nelson-Tasman Housing We'd Choose – Housing Demand Preferences'. This report is available on Council's Future Development Strategy

³ 'National Policy Statement on Urban Development: Housing and Business Assessment for Tasman'. Tasman District Council. 2021.

⁴ Home Affordability Report Quarterly Survey. Massey University. March 2022.

⁵ 'Tasman Growth Projections 2021-2051; Summary of Council's Growth Model as Supporting Information for the Long Term Plan 2021-2031'. Tasman District Council (<https://www.tasman.govt.nz/my-council/key-documents/more/growth/growth-model/>)

⁶ 'Understanding the impacts of releasing greenfields sites for development'. Sense Partners. 2020

webpage: <https://www.tasman.govt.nz/my-council/key-documents/more/future-development-strategy/>.

- Tasman District Council’s Housing and Business Capacity Assessment 2021. This report is available on Council’s website: <https://www.tasman.govt.nz/my-council/key-documents/more/urban-development-reports/capacity-assessments/>.
- Massey University’s Housing Affordability Quarterly Survey March 2022, found here: <https://www.massey.ac.nz/massey/learning/colleges/college-business/school-of-economics-and-finance/research/reau/home-affordability-report.cfm>.
- Tasman District Council’s Age-Friendly Policy 2019. This policy is available on Council’s website: <https://www.tasman.govt.nz/my-council/key-documents/more/age-friendly-policy/>.
- The Ministry for the Environment’s National Medium Density Guideline, found here: <https://environment.govt.nz/assets/publications/national-medium-density-design-guide-31May2022.pdf>.
- The Ministry for the Environment’s 2019 discussion document on the proposed National Policy Statement for Highly Productive Land, found here: <https://www.mpi.govt.nz/dmsdocument/36624-Discussion-document-on-a-proposed-National-Policy-Statement-for-Highly-Productive-Land>.
- A 2017 report prepared by Tonkin & Taylor for Tasman District Council, entitled ‘Plan Change 65 Dambreak Assessment’. <https://www.tasman.govt.nz/my-council/key-documents/tasman-resource-management-plan/plan-changes/operative-changes-and-variations/change-65-wakefield-review-stage-2/>.
- Information from relevant Council staff on infrastructure and servicing capacity, collated in the Background Report in Appendix 2. This includes the following feedback for the proposed Wakefield Development Area:
 - Stormwater input: Stormwater infrastructure is required to mitigate flood hazard. This will need to be addressed by the developer at the time of development⁷. The proposed Residential zoning is therefore deferred subject to the provision of appropriate stormwater management.
 - Wastewater: Wastewater infrastructure improvements are required to provide for the proposed Wakefield Development Area⁸. The provision of wastewater for the site is achievable, however, the proposed Residential zoning needs to be deferred until the required upgrades are completed⁹.
 - Potable water: Potable water can be provided for this site but does require a deferral of the zoning until this is achieved⁹.
 - Flood Hazard: Flood modelling indicates that the lower terraces adjacent to the Pitfure Stream area are required to accommodate flood flows. This will potentially limit the housing yield within the re-zoned area. An indicative reserve has been included along Pitfure Stream, in part to help manage this hazard. Overall, the flood

⁷ Glenn Stevens, Senior Resource Scientist – Hazards, 26 January 2022; and, Wouter Woortman, Team Leader – Infrastructure Planning, email 4 May 2022

⁸ Helen Lane, Infrastructure Planning Advisor, 24 February 2022

⁹ Council Infrastructure Meeting, 9 February 2022

hazard will need to be mitigated to allow this growth area to be developed. This mitigation is considered to be feasible¹⁰ and will be managed through future subdivision consent applications.

- Dam Break Hazard: There are two irrigation dams located to the south-east of the growth area, at 335 Higgins Road. A 2017 dam break assessment¹¹, which estimated the dam break outflow and likely downstream flood effects, found that the area to the north-east of the growth area would be the most affected by a dam break. However, some flooding would also occur along the eastern edge of the south-eastern corner of the growth area. This will need to be mitigated through the design of the development and the resource consenting process.¹⁰
- Productive land: Parts of the Plan Change site are classified as highly productive under the Land Use Capability classification system, the Productive Land Classification 1994 and the Productive Land Classification 2021 which is currently being refined. However, the actual productive capability of the site is limited due to existing Residential and deferred Rural Residential zoning, and Pitfure Stream which runs through the middle of the site¹². This is discussed further in Section 4.1.1.6 below.
- Transport: The proposed Wakefield Development Area is intended to be accessed via Pitfure Road. The Pitfure Road/ Whitby Road intersection will need to be upgraded to provide for this.¹³

Regular vehicle access via Higgins Road has been deemed to be unnecessary, given that adequate vehicle access can be provided via Pitfure Road. It is considered cost prohibitive, as various upgrades would be required on Higgins Road, including a bridge upgrade, widening of Higgins Road to Bird Road, and the Bird Road/SH6 intersection.¹⁴ The use of Higgins Road as a regular vehicle access would also impact the Great Taste Cycle Trail which currently uses this route. However, it is recognised that multiple access routes are important in the event of an emergency. As such, Council's infrastructure team¹⁵ have recommended that Higgins Road is used only as an emergency access (e.g., with bollards that can be lowered to allow access in an emergency event) to ensure resilience. This also retains the ability to open the road up for public vehicle access in the future if desired.

Accessibility, including active and public transport connections, is discussed further in Section 4.1.1.4.

- Reserves: The need for new reserves has been identified and provided for through the indicative items.
- Ecology input: Pitfure Stream dissects the growth area. This section of Pitfure Stream is ephemeral and is considered to have relatively low ecological values, given that it is dry for a large portion of the year, however, potential contaminant discharge needs to be well managed as it with end up in more sensitive receiving

¹⁰ Glenn Stevens, Senior Resource Scientist – Hazards, 28 January 2022

¹¹ Plan Change 65 Dambreak Assessment July 2017, T&T

¹² Mirka Langford, Senior Resource Scientist – Land and Soil, meeting 19 January 2022

¹³ Councillor Workshop, 18 November; Council Infrastructure Meeting, 9 February 2022; and, Waka Kotahi IAF Feedback, 16 July 2022

¹⁴ Drew Bryant, Senior Infrastructure Transport Advisor, 23 February 2022

¹⁵ Council Infrastructure Meeting, 8 October

environments (e.g., Waimea Inlet, Waimea River)¹⁶. There are opportunities to improve the ecological outcomes in this area through protection and planting of stream margins.¹⁶

There is a Significant Natural Area (SNA) containing native bush habitat (podocarp-dominated forest, including remnant totara trees) which borders the south-east boundary of the Plan Change site¹⁷. A new indicative reserve is being sought around the pocket of totara trees adjacent to this SNA within the Plan Change site.

- Feedback received from external infrastructure and service providers, including Waka Kotahi NZ Transport Agency, Transpower, Network Tasman, the Ministry of Education, Fire and Emergency NZ, and Nelson Tasman Civil Defence Emergency Management. This feedback is collated in the Engagement Summary in Appendix 3.
- Feedback received from Te Tau Ihu iwi, is summarised in the Engagement Summary in Appendix 3. This is also discussed in Section 3.2.
- Feedback received through consultation from landowners and the wider community, is summarised in the Engagement Summary in Appendix 3. This includes meetings with the Wakefield Community Council and residents, and meetings with landowners.

3.2 Iwi Involvement and Advice

Iwi of Te Tau Ihu have been involved in the process of developing this proposed Plan Change. The information below summarises the engagement carried out, highlighting the key actions and matters raised by iwi.

Early engagement with iwi has included an initial hui, with all Te Tau Ihu iwi invited, in November 2021. This hui was attended by representatives from Ngāti Toa, Ngāti Kuia, and Te Atiawa, and was used to discuss residential growth in various locations around the district, including the proposed Wakefield Development Area.

High-level feedback was received from this hui in relation to residential growth. This included the support for creating communities with a heart/ centre, implementing Te Mana o te Wai, using Māori placenames, having guiding development principles, and the need for housing that provides for larger families and multigenerational living.

While some of these ideas are beyond the scope of this Plan Change, others have been incorporated into the proposal. This Plan Change contributes to Te Mana o te Wai by including a new indicative reserve along Pitfure Stream – this will ensure that any new housing will be setback from the river and will promote public access to, and care for, the waterway. This Plan Change is also seeking to provide a variety of housing options, which will provide for families of different sizes.

Iwi have been kept informed on the Plan Change, with email updates as the Plan Change evolved through two rounds of informal public consultation. The draft Plan Change material (being the Schedule of Amendments and update maps) was circulated to Te Tau Ihu iwi authorities for comment on 30 June 2022 as per the RMA Schedule 1 requirements.

Feedback was received from Ngati Tama on the 20 July 2022. The feedback generally referenced effects on water quality, the physical structure and hydraulic characteristics of waterbodies and the health of aquatic plants and animals and sedimentation. The plan change has addressed the

¹⁶ Trevor James, Senior Resource Scientist Freshwater and Estuarine Ecology, email 28 January 2022

¹⁷ Matt Moss, Ecologist, email 1 February 2022

potential waterway effects through the inclusion of an indicative reserve along Pitfure Stream which provides a development buffer/setback to protect waterways values. Other issues raised include disturbance to soil and associated ecosystems, catchment management and stormwater management. As part of this Plan Change the zoning of the land is deferred and will not be lifted until Council is satisfied with stormwater and catchment management. Issues surrounding earthworks will be managed at the subdivision stage.

Iwi Management Plans (IMPs) have also been considered in the development of this proposed Plan Change and are discussed in Section 6.6.

3.3 Key Consultation Actions

Council has carried out extensive consultation with landowners, key stakeholders, the local community, and infrastructure and service providers during this plan review process. The feedback received has been instrumental in understanding the issues and desired outcomes, and in considering the options available for achieving these outcomes and the purpose of the RMA. The main consultation actions and Council responses are summarised in this section and in the Engagement Summary in Appendix 3.

Two rounds of informal (pre-notification) public consultation have been undertaken on this Plan Change, as follows:

- The first round of consultation was undertaken in November 2021. This included:
 - Letters to landowners
 - Site visits
 - Phone calls and emails with interested person(s)
 - An in-person presentation at a Wakefield Community Council meeting
 - A webinar for external infrastructure and service providers (including Waka Kotahi NZ Transport Agency, Transpower, Network Tasman, the Ministry of Education, Fire and Emergency NZ, and Nelson Tasman Civil Defence Emergency Management) and one-on-one meetings as required
 - Meetings with Council infrastructure and reserves staff
 - A workshop with Council's elected members
- The second round of engagement was undertaken in March-April 2022, in conjunction with public consultation on the Future Development Strategy 2022. This round of engagement presented the refined Plan Change area boundaries, following consideration of Round One feedback and constraints and servicing information. Due to COVID-19 precautions, all Round Two public engagement was via platforms that maintained social distancing. The Plan Change and consultation opportunities were advertised through Council's communications, including Newsline and social media.

Round Two engagement included:

- An online feedback form
- Sending letters to landowner and adjoining property owners
- Presenting virtually (via video call) at a Wakefield Community Council meeting, with the wider public invited to this call

- A video call meeting with Homes for Wakefield (a sub-committee of the Wakefield Community Council)
- Phone calls and emails with interested person(s)
- Meetings, phone calls and emails with key Council three-water, road and reserves staff
- Emails, phone calls and meetings with external infrastructure and service providers
- A workshop with Council's elected members

The owner of the Plan Change site is generally supportive of the proposal. The Wakefield Community Association, their Homes for Wakefield sub-committee, and the wider community generally recognise the need for housing and are supportive of medium density housing and a variety of housing types and section sizes, seeing a need to provide smaller houses for elderly people wanting to down-size. However, concern has been raised in relation to infrastructure capacity and vehicle access. These matters have been taken into account in the drafting of this Plan Change.

A full summary of consultation is included in Appendix 3.

4. What are the Key Resource Management Issues?

4.1 Problem Definition and Outcome Sought

4.1.1 Problem/ Issues

This Plan Change is responding to the housing shortages and affordability issues currently being experienced throughout New Zealand and the NPS-UD requirements to ensure there is adequate development capacity to provide for expected growth in the Tasman District. This is a significant issue in the Tasman District and includes issues around:

- The need to provide for population growth
- The need to ensure sufficient land supply for housing
- The need for a variety of lot sizes leading to differing housing typologies

In considering the development of the Plan Change site, there is also a need to ensure that:

- Highly productive land is protected
- Walking and cycling connections are provided for
- Sufficient infrastructure capacity is provided
- Flood hazard from Pitfure Stream and the dam break hazard in the north-eastern corner of the site from the adjacent irrigation dams are appropriately managed
- The adverse amenity effects of outdoor fires are managed once the area becomes residential
- The need to support a ki uta ki tai management approach and Te Mana o te Wai

These issues are also considered below.

4.1.1.1 Population Growth

The Tasman District is experiencing high levels of residential growth, putting pressure on existing Residential zoned areas. This growth is anticipated to continue, with the Long-Term Plan 2021-2031 growth model estimating that Tasman's population will increase by 7,700 residents between 2021 and 2031, to reach 64,300 (assuming the medium scenario)¹⁸. This includes an additional 535 people in Wakefield and an estimated 242 additional dwellings.

Wakefield is part of the Nelson Tasman Urban Environment¹⁹ under the National Policy Statement on Urban Development 2020 (NPS-UD). This means that Council is required under the NPS-UD to provide sufficient capacity to meet residential growth demands. The Future Development Strategy 2022 looks at residential growth projections over the next 30 years, and how these can be accommodated within the district.

The Future Development Strategy 2022 has found that some urban expansion is required to provide for growth and for Council to meet its obligations under the National Policy Statement on Urban Development. Through a multi-criteria assessment, the Future Development Strategy 2022 has identified the T-107 Edward Street site (which aligns approximately with the Plan Change site) for urban expansion.

Note that the proposed Wakefield Development Area also includes adjoining land, including existing Residential zoned land, which is not part of the T-107 Edward Street site.

4.1.1.2 Land Supply for Housing

Tasman District Council released a 'Housing and Business Assessment for Tasman' report in 2021²⁰, which looked at housing and business capacity in the Tasman District as part of a wider set of reports to assess the sufficiency of Nelson and Tasman's residential and business land capacity to meet future needs over a 30 year period (2021-2051). This report highlights the issue of housing affordability in the district.

In this 2021 report, the Tasman District was found to have the third highest median house price in the country (behind Auckland and Wellington) and, when considering house prices in relation to income, was found to be the fourth least affordable district to buy a house in (equal with Auckland). Using the Government's measure of housing affordability (Housing Affordability Measure Buy or 'HAM Buy'), it was found that 81% of first home buyer households in the Tasman District could not afford to purchase a house in the District in December 2018, spending more than 30% of their income on housing costs.

While the house price to income ratio suggests that housing is unaffordable for those within the region, strong internal mitigation has supported relatively high house prices in the district.²¹ Tasman's population increased by 1.5% over the 2020-2021 period, which is relatively high compared to the national average.²²

A 2020 Sense Partners report, entitled 'Understanding the impacts of releasing greenfields site for development'²¹ highlighted the need to re-zone some greenfields land for residential expansion to

¹⁸ 'Tasman Growth Projections 2021-2051; Summary of Council's Growth Model as Supporting Information for the Long Term Plan 2021-2031'. Tasman District Council (<https://www.tasman.govt.nz/my-council/key-documents/more/growth/growth-model/>)

¹⁹ Urban environment is defined in the NPS-UD as 'any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: is, or is intended to be, predominantly urban in character; and is, or is intended to be, part of a housing and labour market of at least 10,000 people.'

²⁰ 'National Policy Statement on Urban Development: Housing and Business Assessment for Tasman'. Tasman District Council. 2021.

²¹ 'Understanding the impacts of releasing greenfields sites for development'. Sense Partners. 2020

²² Future Development Strategy 2022: Draft Technical Doc for Consultation. Tasman District Council. 2022

avoid further housing affordability issues. Land availability was found to be a significant driver of housing costs in the Tasman District, with increases in land prices having exceeded increases in house prices. The release of greenfields land for development has the effect of pushing down land prices. This also promotes intensification by managing the price of land in existing urban areas.

Dr Kirdan Lees of Sense Partners reiterated this approach when engaged by Council to provide economic evidence in response to submissions on the Future Development Strategy 2022, with his memo²³ outlining that increases in land prices have outstripped house prices, indicating a shortage of land for development in the district, and that providing greenfields land for development promotes a competitive housing market, which helps to reduce the cost of housing.

The Future Development Strategy 2022 has found that intensification of existing residential areas will not provide sufficient capacity to for anticipated demand on its own, and that some greenfields development is also required to meet the requirements under the NPS-UD.²⁴

4.1.1.3 Typologies

Nelson and Tasman Councils jointly commissioned a report, entitled 'Nelson-Tasman Housing We'd Choose – Housing Demand Preferences'²⁵ in 2021 to understand housing preferences and demand in the Nelson Tasman area. This report found that, while stand-alone freehold dwellings are generally preferred, there is a growing demand for higher density housing options including townhouses, flats, apartments, and retirement units. The report was based on survey data. It was found that 10% of Tasman respondents lived in an apartment or attached dwelling, while (with financial constraints/ household purchasing ability factored in) 29% of respondents would choose an apartment or attached dwelling.

Tasman District Council's 2019 Age-Friendly Policy identifies that there is currently a lack of supply of smaller houses in the district, meaning that many older people remain in larger, older dwellings and properties that are not age-friendly. The policy identifies a need for smaller dwellings that are affordable, accessible, warm, low-maintenance and close to services to cater for the district's aging population. This will allow people to down-size and age in place within their current communities.

This Plan Change is seeking to require a variety of lot sizes which encourages a variety of housing typologies to cater for a variety of household sizes. This is done by requiring the subdivision of parent titles within the proposed Wakefield Development Area greater than 2 hectares to achieve:

- A minimum of 20% of the lots created must have a net area between 270m² and 350m²; and,
- A minimum of 20% of the lots created must have a net area between 350m² and 450m²; and,
- A minimum of 50% of the lots created must be standard residential density (i.e., a minimum net area of 450m²).

The remaining 10% of the lots created can be comprised of any of these densities, or a mixture of all three.

This gives an average density of approximately 15 dwellings per hectare, compared with the TRMP standard density provisions which give an average density of approximately 13 dwellings per

²³ Dr Kirdan Lees. *Review of selected submissions on Nelson-Tasman Future Development Strategy*. Sense Partners. 2022

²⁴ *Future Development Strategy 2022-2052 Technical Report*. Tasman District Council. March 2022.

²⁵ 'Nelson-Tasman Housing We'd Choose – Housing Demand Preferences'. M.E Consulting. 2021

hectare. Note, this has been calculated out using a nominal 5 hectare site with 35% of the land area allocated to roads, reserves, and services.

As an alternative, or complimentary, means of providing for a variety of housing options and increased density, this plan change is also seeking to apply the TRMP's existing Compact Density provisions to the site. The Compact Density provisions do not have a minimum allotment size, allowing for medium density housing to be achieved. It is seeking to encourage medium density housing options to cater for smaller households and ensure efficient land use – this relates to the issue of highly productive land, discussed in Section 4.1.1.6 below.

4.1.1.4 Accessibility and Greenhouse Gas Emission Reductions

The proposed Wakefield Development Area has taken account of Aotearoa New Zealand's Emissions Reduction Plan 2022 and National Adaptation Plan 2022. These documents work together to achieve a climate-resilient Aotearoa New Zealand.

Medium density housing, and greater population density, present opportunities for a walkable and cyclable neighbourhood – where residents can commute within 10-15 minutes via active transport to the town centre. The proposed Wakefield Development Area is located between 600-1,350m away from the Wakefield town centre, meaning that there is the potential to create a walkable/ cyclable neighbourhood in this area, where future residents would be able to walk or cycle into the town centre. This Plan Change includes proposed indicative items, including an indicative reserve along Pitfure Stream, and indicative walkways, to help achieve this outcome. The site also connects with the Tasman Great Taste Cycle Trail which provides a predominately off-road cycle trail to Brightwater, Richmond and beyond.

There is currently a Wakefield Community Bus (operated by the Nelson Tasman Community Transport Trust)²⁶. This bus route goes along Pitfure Road and includes a stop adjacent to the proposed Wakefield Development Area. Council is proposing to extend their bus service to Wakefield, with the introduction of a new bus route in the future. This new bus route will go along Pitfure Road adjacent to the proposed Wakefield Development Area²⁷ and will be operated by electric buses. Walking and cycling connections to a potential bus stop location have been considered and are provided for through the proposed indicative items.

Additionally, the proposed Wakefield Development Area links walking and cycling connections with intermediate and secondary school bus stops and routes.

²⁶ Wakefield Community Bus – <https://www.ntctt.org.nz/wakefield-community-bus>

²⁷ Drew Bryant, Council Infrastructure Meeting, 8 October 2021

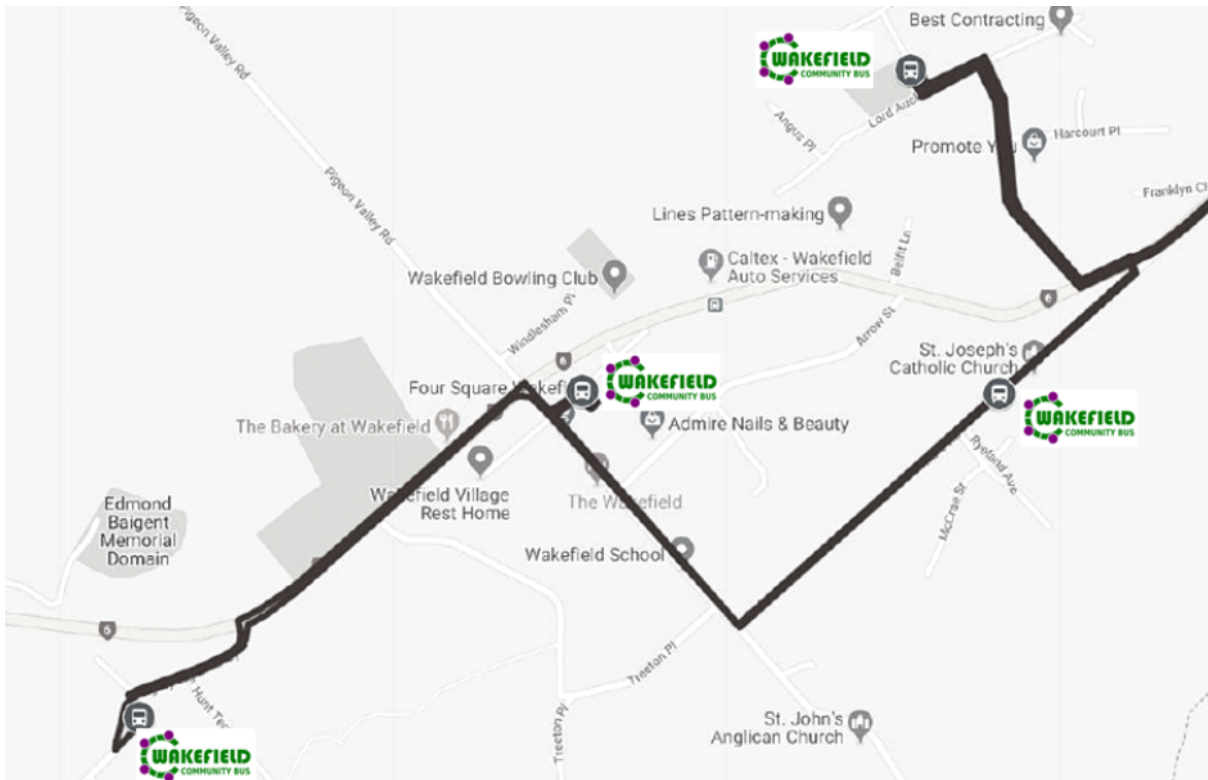


Figure 7: Wakefield Community Bus Route – Wakefield Stops

Overall, the proposed development area provides options for people to walk or bike to local destinations, or to bus further afield. The ability to increase density of residential use also improves this more efficient use of transport and infrastructure which assists with reducing emissions.

4.1.1.5 Urban Design Outcomes

There is a need to ensure that the proposed mix of housing options contribute to a quality urban environment. Tasman District Council’s Urban Design Action Plan 2008 seeks to foster the seven essential design qualities in the New Zealand Design Protocol. This includes ‘choice – ensuring diversity in lifestyle and transport options’. The proposed medium density provisions in this plan change are intended to providing housing options and contribute to achieving this essential design quality.

The Ministry for the Environment have recently released a National Medium Density Urban Design Guide 2022. This provides guidance on creating medium density housing that achieves good urban design outcomes when developing allotments. This guide is focused on the site level, and therefore provides limited guidance for this Plan Change, however, will be of benefit for the development of sites under the proposed plan provisions.

The TRMP includes an Urban Design Guide (TRMP Part II, Appendix 2) to assist with achieving good urban design outcomes. The proposed provisions include design in accordance with this guide. This is to ensure that the housing developed under these provisions result in a quality urban environment.

4.1.1.6 Productive Land

TRMP

The TRMP recognizes the need to protect productive land to provide for the social, economic, and cultural wellbeing of people in the district. This includes objectives and policies relating to the protection of highly productive land to meet the reasonably foreseeable needs of future

generations. Key policies and objectives are outlined in Appendix 4. The site's productive capability, and effects of the rural environment, including reverse sensitivity effects, are considered below.

Proposed National Policy Statement on Highly Productive Land (NPS-HPL)

The proposed NPS-HPL is currently under development and is not finalised or in effect, however, is considered here for completeness. The proposed NPS-HPL Land seeks to recognise the full range of values and benefits associated with the use of highly productive land for primary production, to maintain its availability for primary production for future generations, and to protect it from inappropriate subdivision, use and development.²⁸

It is important to note that, while the proposed NPS-HPL is seeking to protect productive land, it does not intend to provide absolute protection.²⁸ Instead, it requires local authorities to proactively consider the resource in their region or district to ensure it is available for present and future primary production²⁸

The proposed NPS-HPL is not intended to apply to areas that are already identified in the district plan for urban development, such as the Residential and 'Rural 2 deferred Rural Residential' portions of the Plan Change site.²⁸

Productive Capability

The proposed Wakefield Development Area includes land which is currently zoned as Rural 2; a zone which generally contains the district's second highest value soils (after Rural 1). Tasman District Council uses two systems to assess productive land capability. These are:

- The Land Use Capability (LUC) classification system – this is a measure of the versatility of the land, and includes eight soil classifications, LUC 1 being the most versatile with the least limitations, and LUC 8 being the least versatile with the greatest limitations.

Under the Land Use Capability classification system, the strip of Rural 2 land in the middle of the site is classified as LUC 3 which indicates that it has high productive land capability. The remainder of the site is not assessed given its existing Residential and deferred Rural Residential zoning.

- The Productive Land Classification (PLC) system – The Productive Land Classification (PLC) system was developed by Agriculture New Zealand for Tasman District Council in 1994, as the LUC classification system is not reliable for ranking horticultural land types which are significant in the Tasman District²⁹. The PLC system ranges from 'A – Very Intensive Horticulture', being the most productive, to 'H – Non-Productive', being the least productive. The classification indicates the potential land use. Each classification is suitable for the specified land use, and all land uses assigned to categories below itself.

Under the 1994 Productive Land Classification, the site is classified predominantly as 'D' (along Pitfure Stream), and 'F' (to the east of Pitfure Stream). The Productive Land Classification 2021 (which is still being refined) shows the site classified predominantly as 'B2' (along Pitfure Stream), and partially as 'D' (to the east of Pitfure Stream).

Overall, parts of the Plan Change site as classified as highly productive. However, the actual productive capability of the site is limited due to existing Residential and deferred Rural Residential

²⁸ *Valuing Highly Productive Land: a discussion document on the proposed national policy statement for highly productive land. Ministry for the Environment. 2019*

²⁹ *Council's Senior Resource Scientist – Land and Soil*

zoning that covers much of the site, and due to Pitfure Stream which runs through the middle of the site.²⁹

Fragmentation

While the majority of the proposed Wakefield Development Area is held in one title, the 33 hectare site is fragmented by the existing zoning and natural features. This includes approximately 14 hectares of Residential zoned land and 5.5 hectares of 'Rural 2 deferred Residential' land. The remaining Rural 2 area (approximately 11 hectares in area) is dissected by Pitfure Stream. This existing fragmentation limits the site's productive capability.²⁹

Defensible Boundary

When rezoning land for residential development, it is important to seek a defensible development boundary to provide a logical limit to development. This avoids what is typically seen as 'urban spawl' with no natural limit.

The proposed Wakefield Development Area is physically constrained by the residential area to the north-west, Pitfure Stream in the centre, the hills to the south-east, and Edward St to the south-west. This defensible boundary will help to avoid future expansion into the wider rural area and protect land of higher productive capability. The land to the north-east remains in Rural 2 zoning but has been indicated for further development in the Future Development Strategy 2022. A portion of the development area is already zoned for residential and future rural residential use which further constrains the site.

Efficient Land Use

There is a need to ensure that, where urban expansion does occur, it is done in the manner which makes efficient use of land. This Plan Change is seeking to require a certain quota of smaller sections and encourage medium density housing options. This will help to ensure efficient land use and protect other areas of highly productive land that have more productive capacity.

Reverse Sensitivity – Cross Boundary Effects

There is the potential for urban expansion in rural areas to have reverse sensitivity effects on the surrounding rural environment. Examples of this include rural activities such as the spraying of agrichemicals or noise with farm machinery which residents in an adjoining residential area may complain about.

In this case, the proposed Wakefield Development Area is bordered by existing residential land to the west, and is separated from the Rural 2 land to the east by Higgins Road and the steeper topography beyond that. Reverse Sensitivity is not expected to be an issue above what the TRMP rules currently manage.

4.1.1.7 Infrastructure Capacity

Stormwater⁷, wastewater⁸, and potable water⁹ infrastructure improvements are required to provide for the development of the Plan Change site. These improvements are achievable, however, are not yet in place. It is therefore proposed that the rezoning of the Plan Change site be deferred subject to the provision of sufficient stormwater, wastewater and potable water servicing.⁹

The infrastructure requirements are detailed further in the attached Background Report (Appendix 2).

4.1.1.8 Flood Hazard

The proposed Wakefield Development Area is dissected by an ephemeral section of Pitfure Stream. Flood modelling indicates that the lower terraces adjacent to the Pitfure Stream area are required to

accommodate flood flows and these terraces have therefore been included within an indicative reserve as shown in Figure 5. However, the flood hazard will need to be mitigated to allow this growth area to be developed. This mitigation is considered to be feasible.³⁰

This Plan Change includes provisions to ensure that flood risk is appropriately managed at the time of development, including relevant policies and matters of control/ restricted discretion, and an indicative reserve along Pitfure Stream to ensure that an appropriate development setback is achieved.

4.1.1.9 Dam Break Hazard

There are two irrigation dams located to the north-east of the Plan Change site, at 335 Higgins Road. A 2017 dam break assessment³¹, which estimated the dam break outflow and likely downstream flood effects, found that if these dams were to overflow, some flooding would also occur along the eastern edge of the south-eastern corner of the Plan Change site. The dam break inundation hazard is likely to be able to be mitigated with some bunding or overland flow path works.³⁰

The dam break hazard will need to be addressed at the time of development and resource consent.³⁰ This Plan Change includes provisions to ensure that this occurs, including relevant policies and matters of control/ restricted discretion.

4.1.1.10 Deferred Fire Sensitive Area

The TRMP includes existing provisions to manage potential adverse amenity effects from the discharge of contaminants from outdoor burning in residential areas. This is managed through rules that apply to the Fire Sensitive Area overlay, which generally aligns with Residential zoning in the district. In order to manage potential adverse amenity effects and to be consistent with the existing TRMP format, it is proposed that the Wakefield Development Area be a deferred Fire Sensitive Area. This is an extension of the overlay which already applies to the remainder of the Wakefield Township.

4.1.1.11 Ki Uta Ki Tai (Mountains to the Sea) Worldview and Management Approach

The concept of ki uta ki tai reflects a holistic planning approach, where the wider environment and interconnectedness of areas are considered. This concept is relevant to this Plan Change, particularly in terms of providing for the migration of water from the mountains to the sea.

The concept of Te Mana o te Wai is also relevant to this Plan Change. Te Mana o te Wai recognises that protecting the health of the waterway protects the health of the wider environment.

The proposed Plan Change includes provisions to ensure that the development of the site appropriately manages stormwater flows and flood hazard from Pitfure Stream, and that the health of the waterway is protected. This includes an indicative reserve on either side of Pitfure Stream to provide public access to, and promote care for the stream, and to help accommodate flood flows.

Council's Ecology Staff have advised that the adjacent section of Pitfure Stream has low ecological value (given that it is dry for part of the year), however, any contaminant discharge still needs to be appropriately managed as it could end up in a more sensitive receiving environment e.g., the Waimea Estuary. The TRMP includes existing provisions to manage contaminant discharge and water quality.

³⁰ Glenn Stevens, Senior Resource Scientist – Hazards, 28 January 2022

³¹ Plan Change 65 Dambreak Assessment July 2017, T&T

Overall, the proposed Plan Change is consistent with, and helps to achieve, Council's aim of a ki uta ki tai management approach. This Plan Change also supports Te Mana o te Wai.

4.1.1.12 What's Currently Being Done and Why Isn't this Adequate?

The Future Development Strategy 2022 has found that some urban expansion is required to provide for growth and for Council to meet its obligations under the National Policy Statement on Urban Development. The TRMP's existing residential area is not sufficient to provide for future growth. Through a multi-criteria assessment, the Future Development Strategy 2022, has identified the T-107 Edward Street site for urban expansion.

In terms of intensification and achieving a variety of housing typologies, the TRMP currently includes three methods of providing for medium density housing. These are:

- The Richmond Intensive Development Area (RIDA) which was introduced to the TRMP through Plan Change 66 to promote more intensive housing in Richmond and achieve the following objectives:
 - Provide for a diversity and choice of housing density and form in Richmond to cater for a growing population, a changing demographic profile and a range of living options.
 - Encourage residential intensification through a combination of infill and redevelopment in the Richmond Intensive Development Area, which is a 'brownfields' or already developed area located around the town centre.
 - More generally, through stronger policy direction, ensure that medium density housing in Richmond achieves a high standard of amenity.

The RIDA provisions do not apply to the development of land in Wakefield or in other parts of the district outside of Richmond.

- The Compact Density Development provisions which provide for medium density housing in new or 'greenfield' development areas within specific development areas. Compact Density Development does not have a minimum allotment size and requires both the subdivision and land use consents to be lodged together to ensure good design outcomes. They also require a parent title with a net area of 1,500m² or more. The provisions currently apply to specified development areas in Richmond South and West on the outskirts of Richmond, the Motueka Compact Density Area and the Mapua Special Development Area. There is no existing provision for Compact Density Development in Wakefield.
- The Comprehensive Development, which has existed in the TRMP since its inception, is defined as '*a comprehensively planned and designed collection of three or more dwellings on one site.*' These provisions provide for medium density housing in the rest of the Residential zone (including central Richmond), outside of the specified development areas. The Comprehensive Development provisions can be used in Wakefield. However, these provisions have been found to provide limited encouragement for medium density development in the district as they require high levels of consent, provide for a limited level of density and, other than provisions for minimum site size and coverage, and provide no design guidance for the public or decision makers.

The TRMP currently provides only for standard residential development in Wakefield (including in the existing Residential area that is subject to this Plan Change), or development under the Comprehensive Development provisions which has not been widely used in the area. To date, this has resulted in standard density subdivisions which promotes urban sprawl, and do not encourage a variety of housing options in this area or cater for smaller households.

This Plan Change is seeking to apply the TRMP's existing Compact Density Provisions to the proposed Wakefield development area, with the addition of a non-notification provision to encourage the uptake of these provisions.

4.1.1.13 Risks of Not Acting

If additional greenfields land is not released, there is a risk of not providing sufficient residential capacity to accommodate population growth³². This is likely to further increase housing affordability issues³³ and may result in residents leaving the district or facing high housing costs and lack of availability of housing. In addition to this, Council would be in breach of legislative requirements to provide for growth under the National Policy Statement on Urban Development 2020.

If a variety of lot sizes is not required in parts of the district, there is a risk of continued status-quo development, consisting of family homes on standard size lots. This approach will result in a lower housing yield, requiring more area to be developed to cater for growth. Furthermore, this approach does not cater for different demographics and smaller households (e.g., elderly, people without children). Research has shown that there is a demand for medium density housing which is has not been adequately provided for under the current planning provisions³³.

4.1.1.14 Outcomes Sought

This Plan Change is seeking to address the issues outlined above, by:

- Providing greenfields land for residential expansion, by re-zoning land within the Plan Change site from Rural 2 and 'Rural 2 deferred Rural Residential' to 'Rural 2 deferred Residential'. This is to increase housing supply to cater for growth, avoid further affordability issues, and provide for urban expansion in an area of constrained productive value instead of on other highly productive land.
- Requiring a variety of lot sizes to be achieved within the Plan Change site, by introducing a minimum allotment size quota. This is to encourage a variety of housing typologies to cater for different demographics and housing needs
- Encouraging higher density housing options, by making the Plan Change site a Development Area where the TRMP's existing Compact Density provisions apply with the addition of a non-notification provision for the use of these rules within this development area. This is to ensure efficient land use, minimise the need for further residential expansion, cater for different demographics (including the elderly and those without children), and help manage housing affordability issues by increasing supply.
- Providing roads, reserves and walkways to enable active transport and to ensure the health of Pitfure Stream, supporting Te Mana o te Wai.
- Applying the deferred Fire Sensitive Area overlay to the proposed Wakefield Development Area.
- Including policies and rules to ensure that appropriate management of flood hazard and dam break hazard in the north-eastern corner of the site. This is to manage any potential adverse effects.

4.2 Summary of Resource Management Issue/s

Based on the consultation, research and analysis undertaken to develop the problem definition and the general outcomes sought, the following resource management issues have been identified in relation to this Plan Change:

³² *Future Development Strategy 2022*

³³ *'Understanding the impacts of releasing greenfields sites for development'*. Sense Partners. 2020

Issue	Comment
Issue 1: Need for housing, including a variety of lot sizes leading to a variety of housing typologies	<ul style="list-style-type: none"> • The Tasman District is experiencing high levels of residential growth, putting pressure on existing Residential zoned areas. This growth is predicted to continue • The district is currently experiencing housing supply and affordability issues • Tasman District Council have a legal obligation to provide for residential growth – doing nothing is not a legally defensible option • Tasman District Council has heard from the community, through engagement on this Plan Change and other planning projects, that there is a lack of smaller housing options available
Issue 2: Flood Hazard	<ul style="list-style-type: none"> • The Plan Change site is dissected by Pitfure Stream. Flood modelling indicates that the lower terraces adjacent to the Pitfure Stream area are required to accommodate flood flows. This will need to be considered as part of any development and appropriately managed to avoid adverse effects.
Issue 3: Dam Break Hazard in north-eastern corner of site	<ul style="list-style-type: none"> • There are two irrigation dams located to the north-east of the plan change site, which present a flooding hazard for the north-east corner of the plan change site in the event of an overflow. The dam break hazard will need to be addressed at the time of development and resource consent³⁴. This Plan Change includes provisions to ensure that this occurs, including relevant policies and matters of control/ restricted discretion.
Issue 4: Productive Land	<ul style="list-style-type: none"> • Productive land is important for the local economy and livelihoods, resilience, and the district’s character. • The TRMP recognizes the need to protect productive land to provide for the social, economic, and cultural wellbeing of people in the district. This includes objectives and policies relating to the protection of highly productive land to meet the reasonably foreseeable needs of future generations. Key policies and objectives are outlined in Appendix 4. • The proposed National Policy Statement for Highly Productive Land seeks to recognise the full range of values and benefits associated with the use of highly productive land for primary production, to maintain its availability for primary production for future generations, and to protect it from inappropriate subdivision, use and development. • The proposed National Policy Statement for Highly Productive Land does not seek to provide absolute protection for highly productive land and does not apply to areas that are already identified in the district plan for urban development (such as the Residential and ‘Rural 2 deferred Rural Residential’ portions of the Plan Change site). • Council’s Senior Resource Scientist – Land and Soil has advised that the actual productive capability of the site is limited due to existing Residential and deferred Rural Residential zoning that covers much of the site, and due to Pitfure Stream which runs through the middle of the site. • There is a need to encourage intensification and ensure efficient land use, where urban expansion does occur, to protect productive land. This Plan Change is seeking to encourage higher density housing options and efficient land use, to protect productive land in the wider area.
Issue 5: Infrastructure	<ul style="list-style-type: none"> • Stormwater, wastewater, and potable water infrastructure improvements are required to provide for the development of the Plan Change site. These improvements are achievable, however, are not yet in place. It is therefore

³⁴ Senior Resource Scientist – Natural Hazards, 28 January 2022

Issue	Comment
	proposed that the rezoning of the Plan Change site be deferred subject to the provision of sufficient stormwater, wastewater and potable water servicing.
Issue 6: Te Mana O Te Wai	<ul style="list-style-type: none"> The Plan Change includes indicative reserves along Pitfure Stream to allow space for the waterway and flood flows. This also promotes access to, and care for, the stream, and presents an opportunity for biodiversity enhancement.

5. What are the Possible Options?

Considering and evaluating a number of reasonably practicable options to respond to the key issues identified and therefore achieving the objectives is an important part of a Section 32 evaluation. The evaluation sections of this Section 32 include additional explanation of the options considered. These reasonably practicable options are summarised as:

- Option 1: For The provisions proposed in this plan change (set out in greater detail in Section 2.2)
- Option 2: Rezoning the Rural 2 and 'Rural 2 deferred Rural Residential' portions of the Plan Change site to Residential and apply the standard density rules.
- Option 3: Retain the status quo (set out in Section 2.2.1)

These options form part of the evaluation of the approach to this topic. The evaluations are carried out in Sections 8-9.

6. What is the Statutory and Policy Context?

6.1 Introduction

In carrying out a Section 32 analysis, an evaluation is required of how the proposal achieves the purpose contained in Part 2 of the RMA. Section 5 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources.

Sustainable management 'means managing the use, development, and protection of natural and physical resources to enable people and communities to provide for their social, economic and cultural wellbeing and for their health and safety, while -

- sustaining the potential of natural and physical resources (excluding minerals) to meet the reasonably foreseeable needs of future generations; and
- safeguarding the life-supporting capacity of air, water, soil, and ecosystems; and
- avoiding, remedying, or mitigating any adverse effects of activities on the environment'.

In achieving this purpose, councils also need to recognise and provide for the matters of national importance identified in Section 6, have particular regard to other matters referred to in Section 7 and take into account the principles of the Treaty of Waitangi referred to in Section 8.

6.2 Relevant Statutory and Policy Documents

This section sets out a summary of the statutory and policy documents that have particular relevance to this topic. These have been used to inform and guide Council's assessment of the proposal and options to determine the most appropriate options.

6.3 Resource Management Act 1991

6.3.1 Section 6: Matters of National Importance

The Section 6 matters of particular relevance to this topic are:

Relevant matter	Reason for relevance
c) The protection of areas of significant indigenous vegetation and significant habitats of indigenous fauna	The Plan Change site is adjacent to an identified Significant Natural Area (SNA). The portion of the Plan Change site that is near the SNA is a proposed indicative reserve. This will provide to opportunity for biodiversity protection and enhancement in the area.
d) The maintenance and enhancement of public access to and along the coastal marine area, lakes, and rivers	The Plan Change site is dissected by Pitfure Stream. This section of Pitfure Stream is currently running through privately-owned property and does not have public access. The Plan Change includes a new indicative reserve along either side of the stream to provide public access to, and promote care for, Pitfure Stream. This indicative reserve will also have a flood hazard management function.
e) The relationship of Maori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga	It is recognized that iwi have a relationship with the land and water. Te Tau Ihu iwi were engaged early in this Plan Change process to ensure that any cultural values are understood and provided for. Iwi provide provided high-level feedback on residential development, which has been taken into account in the drafting of this Plan Change. No cultural heritage sites have been identified within the Plan Change area.
h) The management of significant risks from natural hazards	Pitfure Stream dissects the Plan Change site and presents a potential flood hazard if not managed appropriately. There are also two irrigation dams located to the north-east of the plan change site, which present a flooding hazard for the north-east corner of the plan change site in the event of an overflow. The Plan Change includes policies and rules to ensure that the flood hazard and dam break hazard are addressed in the development of the site.

6.3.2 Section 7 Other Matters

The Section 7 matters of particular relevance to this topic are:

Relevant matter	Reason for relevance
a) kaitiakitanga	It is recognized that iwi have a role of kaitiakitanga. Te Tau Ihu iwi were engaged early in this Plan Change process to ensure that any cultural values are understood and provided for. Iwi provide provided high-level feedback on residential development, which has been taken into account in the drafting of this Plan Change.
b) the efficient use and development of natural and physical resources	There is a need to encourage intensification and ensure efficient land use, where urban expansion does occur, to protect productive land. This Plan Change is seeking to achieve this through requiring smaller lot sizes and enabling and encouraging Compact Density Development within the site.
c) the maintenance and enhancement of amenity values	The Plan Change includes indicative reserves which will enhance the area's amenity values. As outlined above - The Plan Change site is dissected by Pitfure Stream. This section of Pitfure Stream is currently running through privately-owned property and does not have public access. The Plan Change includes a new indicative

	<p>reserve along either side of the stream to provide public access to, and promote care for, Pitfure Stream.</p> <p>The Plan Change also includes indicative reserves around existing trees on the site, to provide neighbourhood parks and green space.</p>
d) intrinsic values of ecosystems	<p>The adjacent section of Pitfure Stream is considered to have relatively low ecological values, given that it is dry for part of the year. However, the discharges of sediment and nutrients still need to be managed well because they will end up in sensitive areas e.g., Waimea Inlet and Waimea River.</p> <p>Opportunities exist to improve the ecological outcomes from protection and planting of the stream margins.</p> <p>There are no Significant Natural Areas or wetlands within Plan Change site.</p>
i) the effects of climate change	<p>The proposed Wakefield Development Area is within close proximity to the Wakefield Town Centre and provides opportunities for active transport options. This includes indicative roads, reserves and walkways to enable active transport. The site is also within close proximity to the Great Taste Cycle Trail and the bus route, which provide access into Richmond. This reduces the reliance on private vehicles and therefore positively contributes to reducing greenhouse gas emissions.</p>

6.3.3 Section 8 Treaty of Waitangi

The principles of the Treaty of Waitangi (Te Tiriti o Waitangi) that have been taken into account and the Te Tau Ihu iwi involved in the development of the Plan Change and its provisions.

Early engagement with iwi has included an initial hui, with all Te Tau Ihu Iwi invited, in November 2021. This hui was attended by representatives from Ngāti Toa, Ngāti Kuia, and Te Atiawa, and was used to discuss residential growth in various locations around the district, including the proposed Wakefield Development Area.

High-level feedback was received from this hui in relation to residential growth. This included support for creating communities with a heart/ centre, implementing Te Mana o te Wai, using Māori placenames, having guiding development principles, and the need for housing that provides for larger families and multigenerational living.

Additional consultation with iwi representatives was undertaken via email through the development of this Plan Change including the provision of indicative mapping and policy direction. No other feedback was received.

The final draft notification material was sent to iwi representatives as part of the Schedule 1 RMA requirements. Through this consultation, general feedback was received from Ngati Tama (20 July 2022). Feedback included reference to effects on water quality, the physical structure and hydraulic characteristics of waterbodies and the health of aquatic plants and animals and sedimentation. The plan change has addressed the potential waterway effects through the inclusion of an indicative reserve along Pitfure Stream which provides a development buffer/setback to protect waterways values. Other issues raised include disturbance to soil and associated ecosystems, catchment management and stormwater management. As part of this Plan Change the zoning of the land is deferred and will not be lifted until Council is satisfied with stormwater and catchment management. Issues surrounding earthworks will be managed at the subdivision stage.

No other feedback has been received and it is considered that the principles of the Treaty of Waitangi have been taken into account during the development of this Plan Change.

6.4 National Instruments

The National Instruments considered for their relevance to this topic are the National Policy Statements, including the New Zealand Coastal Policy Statement, and the National Environmental Standards that are currently in force.

Relevant national instrument	Reason for relevance
National Policy Statements	
National Policy Statement on Urban Development (NPS-UD) 2020	<ul style="list-style-type: none"> • Requires Tasman District Council to provide for anticipated housing demand. • Includes policies and objectives that set direction for Councils to (among other things) improve housing affordability, enable a variety of homes, and provide development capacity to meet expected housing demand. • Policies and objectives of particular relevance are as follows: <ul style="list-style-type: none"> ○ Objective 1: <i>Planning decisions improve housing affordability by supporting competitive land and development markets</i> ○ Policy 1: <i>Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:</i> <ul style="list-style-type: none"> a) <i>have or enable a variety of homes that:</i> <ul style="list-style-type: none"> (i) <i>meet the needs, in terms of type, price, and location, of different households; and</i> (ii) <i>enable Māori to express their cultural traditions and norms; and</i> b) <i>have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and</i> c) <i>have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and</i> d) <i>support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and</i> e) <i>support reductions in greenhouse gas emissions; and</i> f) <i>are resilient to the likely current and future effects of climate change.</i> ○ Policy 2: <i>Tier 1, 2, and 3 local authorities, at all times, provide at least sufficient development capacity to meet expected demand for housing and for business land over the short term, medium term, and long term.</i>
National Policy Statement for Freshwater Management (NPS-FM) 2020	<ul style="list-style-type: none"> • Relevant to development near Pitfure Stream. • Requires Council to give effect to Te Mana o te Wai and – in doing so – to manage freshwater, and land use and development, in catchments in an integrated and sustainable way to avoid, remedy, or mitigate adverse effects, including cumulative effects, on the health and well-being of water bodies, freshwater ecosystems, and receiving environments.
Proposed National Policy Statement for Highly Productive Land (NPS-HPL)	<ul style="list-style-type: none"> • The purpose of the NPS-HPL is to: <ul style="list-style-type: none"> ○ recognise the full range of values and benefits associated with its use for primary production

Relevant national instrument	Reason for relevance
<p>Note: This is a proposed NPS and has no legal effect, and therefore does not have weighting.</p>	<ul style="list-style-type: none"> ○ maintain its availability for primary production for future generations ○ protect it from inappropriate subdivision, use and development. ● Strengthens the requirements for Council to manage versatile and productive land to ensure its long-term availability for primary production. ● Require councils to identify HPL within their region and protect this resource for land-based primary production, with a particular focus on protecting HPL from lifestyle development, undesirable urban expansion and ‘other’ inappropriate subdivision, use and development. ● Does not seek to provide absolute protection for HPL and recognises that non-productive uses are appropriate on HPL in certain circumstances. ● Does not impact on existing urban areas and land that councils have identified as future urban zones in district plans. ● Relevant to the productive value of the Plan Change site, and the need to ensure efficient land use that minimises sprawl.
<p>Proposed National Policy Statement for Indigenous Biodiversity (NPS-IB)</p> <p>Note: This is a proposed NPS and has no legal effect, and therefore does not have weighting.</p>	<ul style="list-style-type: none"> ● The proposed NPS-IB seeks to avoid the loss and fragmentation of, and manage adverse effects on, Significant Natural Area (SNAs). ● The proposed NPS-IB is relevant as the Plan Change site is adjacent to an identified SNA. The portion of the Plan Change site that is near the SNA is a proposed indicative reserve. This will provide to opportunity for biodiversity protection and enhancement in the area.
National Environmental Standards	
n/a	There are no applicable National Environmental Standards.

6.5 Operative Regional Policy Statement and Resource Management Plans

The Tasman Regional Policy Statement (TRPS) and TRMP include existing policies, objectives and methods of implementation that are relevant to this Plan Change in terms of:

- Providing for residential development.
- Avoiding, remedying or mitigating the adverse effects of urban development.
- Ensuring the efficient use and development of resources.
- Protecting productive land.
- Managing flood hazard and stormwater.
- Providing for Compact Density Development in specified development areas. These existing provisions are proposed to be applied to the proposed Wakefield Development Area as part of this Plan Change.

The relevant objectives, policies, and methods in the operative TRPS and TRMP are identified in Appendix 4.

6.6 Iwi Management Plans

The following Iwi Management Plans are considered to be relevant to this topic. The table below identifies the particular document and the relevant provisions within it.

Iwi Management Plan	Relevant Provisions	Reason for Relevance
Ngāti Koata No Rangitoto ki te Tonga Trust Iwi Management Plan 2002	<p>The Ngāti Koata IMP identifies the issues of importance to the relationship between land, air, and water and that the modification of land can adversely affect the resources of value to Ngāti Koata.</p> <p>The objectives refer to protection of Ngāti Koata heritage values and the maintenance and enhancement of landscape values of significance to Ngāti Koata.</p>	The TRMP includes existing provisions related to the relationship between land, air, and water and iwi values, and to the maintenance and enhancement of landscape values.
Pakohe Management Plan 2015 – Ngati Kuia	n/a – this does not relate to urban development in Wakefield.	n/a – this does not relate to urban development in Wakefield.
Ngāti Tama Environmental Management Plan 2018	The Ngāti Tama IMP seeks that urban development is contained within urban zones and that rural areas are protected from urban development. The IMP also seeks that any urban development maintains and enhances the natural environment. Ngāti Tama wishes to be actively involved in the decision-making process which involve zoning land.	<p>The Plan Change site includes land which is currently zoned Rural 2, however, the productive value of the Plan Change site is considered to be limited by the physical constraint of Pitfure Stream, and existing Residential and deferred Rural Residential zoning.</p> <p>This Plan Change is seeking to encourage higher density housing options and efficient land use, to protect productive land in the wider area.</p>
Ngāti Rārua Environmental Strategy 2021	The Ngāti Rārua Environmental Strategy 2021 encourages affordable housing options, opposes development in areas of significance to them, discourages urban development within areas of high natural values or on highly productive rural land. Incorporation of cultural values in urban development is supported and the use of appropriate Maori names in areas of new development are encouraged.	<p>This Plan Change is intended to provide housing supply (including smaller housing options) and contribute to affordability. The Plan Change site has not been identified as an area of high natural values, although it is noted that a Significant Natural Area borders the eastern site boundary – an indicative reserve is proposed on the portion of the Plan Change site that adjoins this area.</p> <p>While this Plan Change involves urban expansion into rural land, the productive value of the Plan Change site is considered to be limited by the physical constraint of Pitfure Stream, and existing Residential and deferred Rural Residential zoning.</p>

There are no other relevant IMPs. Details of iwi engagement are provided in Section 3.2 and Appendix 3.

6.7 Relevant management plans and strategies

The following plans, strategies, heritage listings and regulations are relevant to this Plan Change:

Item of relevance	Organisation	Relevant Provisions
Future Development Strategy 2022	Tasman District Council	<ul style="list-style-type: none"> Identifies the Plan Change site for residential development.
Long Term Plan 2021-2031, including the Infrastructure Strategy	Tasman District Council	<ul style="list-style-type: none"> Provided population growth estimates. Outlines planned infrastructure works.
Intensification Action Plan 2020	Tasman District Council	<ul style="list-style-type: none"> Looks at ways in which residential growth can be provided for through intensification, following the Future Development Strategy 2019. Includes actions to: <ul style="list-style-type: none"> Incentivise the building of smaller dwellings Ensure sufficient capacity of appropriately zoned, serviced land for medium density housing in identified settlements, to enable supply Require high quality design standards for medium density housing through the new Tasman Environment Plan. Ensure Plan rules continue to permit two storey and enable three storey in the future. While this Plan Change is providing for greenfields development, there is also an element of intensification, in recognising the need to encourage medium density housing and provide a variety of lot sizes. The Intensification Action Plan is relevant to this aspect of the proposal.
Walking and Cycling Strategy 2022	Tasman District Council	<ul style="list-style-type: none"> Aims to improve transport network capacity, promote healthy communities (with safe active transport), look after the environment (by reducing carbon emissions), and create vibrant urban areas (with walkable communities). Includes plans for a separate cycle lane along Pitfure Road, and 30kph 'slow speed residential streets' within the urban areas of Wakefield.
Age-Friendly Policy 2019	Tasman District Council	<ul style="list-style-type: none"> Recognises that the Tasman District has an aging population. Includes a goal for a range of affordable and appropriate housing options for older people. Includes objectives to enable and encourage higher density development close to services

Item of relevance	Organisation	Relevant Provisions
		<p>across the District, and to enable and encourage smaller, more affordable dwellings, including second dwellings and the redevelopment of existing dwellings.</p> <ul style="list-style-type: none"> • Outlines feedback from people over 65 years of age that there is a need for smaller dwellings that are affordable, accessible, warm, low-maintenance, and close to services to allow people to age in place in their current communities.
Urban Design Action Plan 2008	Tasman District Council	<ul style="list-style-type: none"> • Seeks to foster the seven essential design qualities in the New Zealand Design Protocol. • This includes ‘choice – ensuring diversity in lifestyle and transport options’. • The proposed medium density provisions in this plan change are intended to providing housing options and contribute to achieving this essential design quality.
Aotearoa New Zealand’s Emission Reduction Plan 2022 and National Adaptation Plan 2022	Central government	<ul style="list-style-type: none"> • The proposed Wakefield Development Area has taken account of Aotearoa New Zealand’s Emissions Reduction Plan 2022 and National Adaptation Plan 2022. These documents work together to achieve a climate-resilient Aotearoa New Zealand. • In terms of emissions reduction, the proposed development area is an extension of the existing township with the ability to easily access existing roading and transport networks. This gives people the ability to choose to walk or bike to local destinations, or to bus further afield. It also enables existing infrastructure to be utilised to the extent this is available which improved efficiency of that infrastructure. The ability to increase density of residential use also improves this more efficient use of transport and infrastructure which assists with reducing emissions. • In terms of adaptation, the Plan Change has provided space for flood events using indicative reserves alongside the Pitfure Stream. The associated infrastructure will be able to be developed in line with Council’s Land Development Manual to accommodate climate change effects.

6.8 Other relevant legislation or regulations

The following legislation and regulations are relevant to this topic/issue:

Relevant Legislation/Regulation	Relevant Provisions	Reasons for relevance
Resource Management (Enabling Housing Supply and Other Matters) Amendments Act 2021	Medium Density Residential Standards (MDRS)	<ul style="list-style-type: none"> Requires Tier 1 councils (in the greater urban areas of Auckland, Hamilton, Tauranga, Wellington, Christchurch,) and some Tier 2 and 3 councils experiencing acute housing demand to apply the Medium Density Residential Standards (MDRS) to most of their existing residential areas as part of their plans from August 2022. The MDRS enable a variety of housing, including an allowance for up to three dwellings per site, each being up to three storied, subject to compliance with relevant standards. Tasman District Council is not required to apply the MDRS, however, this is relevant in terms of what is being done in other areas around the country to address housing needs.

6.9 National Guidance Documents

The following National Guidance Documents are relevant to this Plan Change.

Relevant National Guidance Documents	Reasons for relevance
National Medium Density Design Guide 2022	<ul style="list-style-type: none"> Provides guidance of the design and development of medium density housing, including design principals and priority design elements. Provides guidance at a site-development level. Has a focus on the Medium Density Residential Standards in the Resource Management (Enabling Housing Supply and Other Matters) Amendments Act 2021. Draws on kaupapa Māori design, understanding specific knowledge, considerations, and protocols associated to kāinga.
Valuing Highly Productive Land: A discussion document on a proposed national policy statement for highly productive land	<ul style="list-style-type: none"> Outlines the objectives and intent of the proposed NPS-HPL, including issues around urban expansion on highly productive land and the fragmentation of highly productive land.

6.10 Plans of adjacent territorial and regional authorities

RMA Sec 66(2)(d) and 74(2)(c) require regard to be had to the need for consistency with the RPS and Regional Plan (operative or proposed), and operative or proposed district plans, of adjacent authorities.

The RMA requires Council to have regard to the need for consistency with the Regional Policy Statement or Plans, or District Plans (both operative and proposed) of the adjacent authorities. The following documents and specific provisions have been considered in terms of the need for consistency:

Relevant Authority Document	Relevant Provisions	Need for consistency
Nelson Resource Management Plan (NRMP)	Residential Zone Rule REr.2 – Minimum Site Area	<p>The NRMP separates the Residential Zone into four categories (Lower Density Area, Lower Density Area (Stoke), High Density Area, and Standard Density), each with a different minimum allotment size. This includes a minimum allotment size of 400m² in the Standard Density area, and a minimum allotment size of 300m² in the higher Density area.</p> <p>The existing structure of the TRMP is different to the NRMP. The proposed Plan Change is intended to fit within the existing structure of the TRMP, and does not need to be consistent with the NRMP.</p>

6.11 National Planning Standards

The National planning standards were introduced in April 2019 with the purpose of improving the consistency of council plans and policy statements and relate to the structure and content of regional and district plans.

This Plan Change has been drafted to fit within the existing structure of the TRMP with minimal change to ensure clarity and consistency with the existing TRMP. Tasman District Council are in the process of preparing a new unitary plan – the ‘Tasman Environment Plan (TEP)’ – which will be prepared in accordance with the National Planning Standards.

7. What are the Proposed Objectives, Policies and Methods?

7.1 Proposed Objectives, Policies and Methods

The purpose – and therefore the objective – of this Plan Change is to provide for housing and encourage intensification within an identified site in Wakefield (the proposed Wakefield Development Area). This is responding to issues around the need to provide for population growth, the need to manage housing affordability and the need to provide a variety of housing typologies to cater for different demographic and ensure efficient land use. This is discussed further in Section 4.

This Plan Change does not seek to introduce any new objectives into the TRMP, however, it does include new policies and methods. The proposal changes to the TRMP text, including new and amended policies and methods, are shown in the Schedule of Amendments and summarised below.

Key changes to the TRMP include:

- The introduction of new minimum allotment size criteria for the subdivision of parent titles greater than 2 hectares in net area in the proposed Wakefield Development Area, including the introduction of Rule 16.3.3.1B. This is to require a minimum of 20% of the resultant titles to have a net area between 270m² and 350m², another 20% or more must have a net area between 350m² and 450m², and 50% to be standard residential density (i.e., a minimum net area of 450m²). The remaining 10% of resultant titles can be comprised of any of these densities, or a mixture of all three.
- The introduction of the Wakefield Development Area and amendments to the existing Compact Density provisions (including the definition, and relevant policies, methods of implementation, and rules) to apply these provisions to the proposed Wakefield Development Area.

- The introduction of a non-notification provision for the use of Compact Density subdivision and land use in the proposed Wakefield Development Area (including relevant policies, rules, and explanatory text).
- Provisions (including policies, methods of implementation, rules and matters of control/ discretion) to ensure that the development of smaller lots in the proposed Wakefield Development Area achieves good urban design outcomes in accordance with the Urban Design Guide (TRMP Part II, Appendix 2).
- Provisions (including policies and matters of control/ discretion) to ensure that flood hazard and dam break hazard in the north-eastern corner of the site is appropriately managed for the development of the proposed Wakefield Development Area.
- Indicative items (roads, walkways and reserves) to provide for accessibility, flood flows, and recreation.
- Applying the TRMP’s deferred Fire Sensitive Area to the site.

8. Are the Proposed Objectives of the proposal the most appropriate way to achieve the purpose of the Act?

8.1 Evaluation Context

This section of the report evaluates the proposed objectives to determine whether they are the most appropriate way to achieve the purpose of the Act.

Section 32 encourages a holistic approach to assessing objectives, rather than looking at each objective individually. This recognises that the objectives may work inter-dependently to achieve the purpose of the Act.

For the purposes of this evaluation the following criteria form the basis for assessing the appropriateness of the proposed objectives:

Category	Criteria
Relevance	<ul style="list-style-type: none"> • Directed to addressing a resource management issue • Focused on achieving the purpose of the Act • Assists the Council to carry out its statutory functions (RMA s.30 and s.31) • Within scope of higher-level documents
Feasibility	<ul style="list-style-type: none"> • Acceptable level of uncertainty and risk • Realistically able to be achieved within Council’s powers, skills and resources
Acceptability	<ul style="list-style-type: none"> • Consistent with identified iwi/Maori and community outcomes • Will not result in unjustifiably high costs on the community or parts of the community

8.2 Evaluation of the Plan Change objective

This Plan Change does not add any objectives to the TRMP, nor does it amend any existing objectives. As per RMA sec 32(6)(b), the objective of this Plan Change is therefore the same as the Plan Change purpose which is to provide additional land for residential housing and encourage both intensification and a variety of densities within an identified site in Wakefield (the proposed Wakefield Development Area).

Through considering the consultation undertaken and issues identified Council has developed the following potential options for achieving the purpose of the plan change:

- 1) Plan Change proposal – To provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area.
- 2) Standard density residential - Rezoning for standard density residential growth without any provisions to provide an increase in density or an increased variety of lot sizes.
- 3) Status Quo – no change in zoning.

Plan Change Objective Assessment - Wakefield:

To provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area.

General intent:

This is responding to issues around the need to provide for population growth, the need to manage housing affordability, and the need to provide a variety of lot sizes to cater for different demographics. It also helps achieve more efficient land use.

Under this objective, the Plan Change intends to:

- Provide greenfields land for residential expansion, by re-zoning land within the Plan Change site from Rural 2 and 'Rural 2 deferred Rural Residential' to 'Rural 2 deferred Residential'. This is to increase housing supply to cater for growth, assist with avoiding further housing affordability issues, and provide for urban expansion in an area of constrained productive value instead of on other highly productive land.
- Require a variety of lot sizes to be achieved, by introducing a minimum allotment size quota. This is to encourage a variety of housing typologies to cater for different demographics and housing needs
- Encourage higher density housing options, by making the Plan Change site a Development Area where the TRMP's existing Compact Density provisions apply with the addition of a non-notification clause for the use of these rules within this development area. This is to ensure efficient land use, minimise the need for further residential expansion, cater for different demographics, and help manage housing affordability issues by increasing supply.
- Include policies and rules to ensure appropriate management of flood hazard and dam break hazard effects.
- Include indicative items to provide for recreation, flood management, and connectivity purposes.
- Make the proposed Wakefield Development Area a deferred Fire Sensitive Area.

Other potential objectives

The key alternative option relating to the purpose of the Plan Change is to rezone the site to 'Rural 2 deferred Residential' without any provision to provide an increase in density or an increase in the variety of lot sizes. This would allow for standard residential development, enabling a single residential dwelling to be constructed on each site as a permitted activity (TRMP Rule 17.1.3.1), and requiring a minimum lot size of 450m² for subdivision to occur as a controlled activity (TRMP Rule 16.3.3.1). The Residential Zone rules also allow for Comprehensive Development land use (being the construction of three or more dwellings per site) to occur with a restricted discretionary activity status (TRMP Rule 17.1.3.4A) or higher.

This option allows for standard density or Comprehensive residential expansion to occur within the existing Rural 2 and 'Rural 2 deferred Rural Residential' land which would be rezoned for residential use.

This option does not further enable or encourage medium density development. This option is therefore of limited benefit in terms of providing for residential growth within the region, for encouraging a variety of housing options, and for protecting soils of greater productive capacity.

The status quo option of retaining the current zoning patterns and making no change has been shown to not meet the obligations set out in NPS-UD to provide for growth within the district. This position has been reinforced through the Future Development Strategy 2022 processes, and the supporting

Plan Change Objective Assessment - Wakefield:		
<p>information to this Plan Change referenced in Section 3. The further assessment will therefore focus on options 1 and 2 for achieving the objective of the Plan Change.</p> <p>The assessment below considers the proposed option and the potential viable alternative of rezoning as standard density development by way of comparison.</p>		
Other relevant objectives in the Plan:		
<p>Objective 6.2.2.3: <i>For the period 2021 to 2051, the minimum sufficient development capacities for housing in the Tasman portion of the Nelson-Tasman Urban Environment are provided.</i></p> <p>Objective 6.2.2.2: <i>Urban growth and sufficient opportunities, including redevelopment opportunities that encourage more efficient use of land, energy and provision of infrastructure, services and amenities.</i></p> <p>Objective 14.1.2: <i>Adequate area and distribution of a wide range of reserves and open spaces to maintain and enhance recreation, conservation, access and amenity values.</i></p>	<p>The TRMP contains existing objectives which relate to the objective of this plan change. Objectives 6.2.2.3 and 6.2.2.2 are of particular relevance, as they are seeking to achieve a similar outcome to the Plan Change objective, being the provisions of residential housing capacity and of efficient land use.</p> <p>Objectives 14.1.2 is also relevant, in terms of providing sufficient reserve space to cater for future development of the site.</p> <p>Other relevant objectives are considered in Section 6.5 and Appendix 4.</p>	
	Plan Change objective	Standard residential density development
	To provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area.	To rezone the 'Rural 2' and 'Rural 2 deferred Rural Residential' portions of the site to 'Rural 2 deferred Residential' without any provision to provide an increase in density or an increase in the variety of lot sizes.
Relevance:		
Directed to addressing a resource management issue	Helps to address the following resource management issues:	This options partially addresses the identified resource management issues but is not a directed response as it only enables standard density development (or Comprehensive Development at a restricted discretionary

Plan Change Objective Assessment - Wakefield:		
	<ul style="list-style-type: none"> • Providing sufficient housing capacity for residential growth projections. • Housing affordability. • The need to provide a variety of housing typologies to cater for different demographic and ensure efficient land use. • Management of issues around flood hazard, dam break hazard in the north-eastern corner of the site, and productive land, through provisions within the Plan Change. • To provide sufficient reserve space. 	activity status or higher). This is less effective at providing residential growth capacity in Wakefield to meet population projections and does not further enable or encourage medium density development.
Focused on achieving the purpose of the Act	<p>This objective helps to achieve the purpose of the Act by:</p> <ul style="list-style-type: none"> • Catering for residential growth projections, to meet the foreseeable needs of future generations in a way that sustains natural resources such as other areas with greater production capacity. • Providing for sustainable residential development, by ensuring efficient land use. • Zoning patterns provide space to manage the effects of the activity on the environment. 	<p>This option will not change the objectives, policies, rules of the TRMP, or the methods used within the TRMP to achieve the purpose of the Act.</p> <p>The use of the land for standard density residential development is not an effective way of sustaining the natural resources of other land with more productive potential.</p>
Assists the Council to carry out its statutory functions (RMA s.30 and s.31)	The objective of this Plan Change assists Council with carrying out its statutory functions by ensuring that there is sufficient development capacity for housing – RMA s30(1)(ba), and s31(1)(aa).	This option will not change the objectives, policies, rules of the TRMP, or the methods used within the TRMP to assist Council to carry out its statutory functions.

Plan Change Objective Assessment - Wakefield:

	<p>It can be undertaken in a way that does not restrict Council’s other responsibilities in relation to the quality of water bodies, ecosystems, soil conservation, and the avoidance or mitigation of natural hazards.</p>	<p>This option is less effective at ensuring there is sufficient development capacity for housing – RMA s30(1)(ba), and s31(1)(aa).</p>
<p>Within scope of higher-level documents</p>	<p>The objective of this Plan Change is within the scope of the National Policy Statement on Urban Development 2020.</p> <p>While not yet in legal effect, the proposed National Policy Statement on Highly Productive Land is also relevant. The productive capacity of the site and the need to ensure efficient land use have been considered.</p> <p>The proposed National Policy Statement for Indigenous Biodiversity (also not yet in legal effect) is also of relevance, as part of the Plan Change site is adjacent to an identified SNA. The portion of the site adjacent to the SNA is a proposed indicative reserve, to avoid adverse effects on the SNA and provide opportunity for biodiversity enhancement.</p>	<p>This option is also within the scope of the National Policy Statement on Urban Development 2020, however is less effective at achieving the supply of residential land directed by the NPS.</p>
<p>Feasibility:</p>		
<p>Acceptable level of uncertainty and risk</p>	<p>Provisions are included to manage potential adverse effects, including effects related to flood hazard and dam break hazard. Provisions are also included to ensure good urban design outcomes design in accordance with the Urban Design Guide (TRMP Part II, Appendix 2).</p> <p>The Plan Change also includes indicative items to ensure that key transport connections are made, and that sufficient reserve area is provided.</p>	<p>There is a risk of insufficient housing capacity, and of continued standard density development.</p> <p>Uncertainty is also created in relation to other areas of land with more productive capacity as these may also be required in the future to provide for residential growth.</p>

Plan Change Objective Assessment - Wakefield:

	The proposed changes use the existing TRMP format and provisions where possible, to minimise uncertainty. This includes relying on existing provisions in relation to bulk and location of future buildings, and subdivision requirements. In addition, all other provisions around the develop of residential sites and location adjacent to water courses remain the same.	
Realistically able to be achieved within Council’s powers, skills and resources	<p>The proposed changes use the existing TRMP format and provisions where possible. This helps to ensure that the provisions are realistic.</p> <p>Future development within the area is consistent with the same activity in many areas of existing Residential zoning within the district. Therefore, use of provisions relating to the new zoned land is consistent with Council’s current function.</p>	Rezoning as standard residential is realistic as it would be consistent with other Residential zoning throughout the district and would have the same outcome of standard residential density development.

Acceptability:

Consistent with identified iwi/Maori and community outcomes	This Plan Change includes engagement with iwi, consideration of applicable Iwi Management Plans and incorporation of relevant ideas, including Te Mana o te Wai and providing for a variety of housing options.	Rezoning as standard residential would be consistent with some of the identified iwi outcomes, including Te Mana o Te Wai which is provided for through the NPS-FW. However, this option would not achieve other outcomes of providing for a variety of housing options.
Will not result in unjustifiably high costs on the community or parts of the community	<p>The proposal will not result in unjustifiably high costs on the community, and will help to manage housing affordability issues. The costs of implementing the proposal are consistent with those for any residential development.</p> <p>Council’s Development Contributions Policy will apply to the development of the sites.</p>	This option will result in similar development costs to other residential developments in the district. However, this option will not encourage increased density, and therefore is unlikely to provide as many houses, limiting the impact on housing affordability. Furthermore, this option will not encourage more efficient use of land, which will have a cost in terms of not protecting other areas of higher productive land capacity.

Overall assessment of the appropriateness of the Plan Change objective

Overall, the proposed Plan Change objective is considered to be an appropriate way to achieve the purpose of the Act for the following reasons:

Plan Change Objective Assessment - Wakefield:

- It responds to the identified issues and will assist with resolving these
- It achieves the purpose of the Act by enabling efficient residential development and sustainable use of the land resource
- It assists Council with their statutory responsibilities under the RMA, and other national planning documents such as the NPS-UD
- The proposal can be realistically achieved as it predominantly relies on application of existing provisions relating to development, or modifications of those provisions
- There are no unjustifiable costs on the community, and the proposal is consistent with identified Maori and community outcomes.

9. Are the Proposed Policies and Methods the most appropriate way to achieve the Objectives?

9.1 Evaluation of proposed Policies and Methods

Section 32(1)(b) requires evaluation of the appropriateness of the policies and methods that are proposed to achieve the proposed objective/s of the Plan Change. The policies and methods, including the reasonably practical options have been developed through the consultation, information reporting, research and analysis that has been undertaken for this topic. The level of this assessment has been determined by the scale and significance of the change.

The reasonably practicable options for achieving the objectives are set out in Section 5 and Section 8.2.

With respect to the preferred option, an evaluation of the provisions has been undertaken relating to the costs, benefits and the certainty and sufficiency of information in order to determine the effectiveness and efficiency of the approach, and whether it is the most appropriate way to achieve the relevant objective(s).

This evaluation of the provisions to achieve the objective/s is set out in the following table:

Plan Change Objective 1: To provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area.

The proposed policies and methods are set out in full in the Schedule of Amendments. In summary these includes policies and methods related to the following:

- The introduction of new minimum allotment size criteria for the subdivision of parent titles greater than 2 hectares in net area in the proposed Wakefield Development Area, including the introduction of Rule 16.3.3.1B. This includes provisions to ensure that the development of smaller lots in the proposed Wakefield Development Area achieve good urban design outcomes in accordance with the Urban Design Guide (TRMP Part II, Part II), and that dam break hazard in the north-eastern corner of the site and flood hazard are appropriately addressed.
- The introduction of the Wakefield Development Area and amendments to the existing Compact Density provisions to apply these provisions to the proposed Wakefield Development Area. This includes applying a non-notification provision for the use of Compact Density subdivision and land use in the proposed Wakefield Development Area.
- Making the proposed Wakefield Development Area a deferred Fire Sensitive Area.

Proposed Provisions	Costs	Benefits	Effectiveness and Efficiency	Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions
<p>The introduction of new minimum allotment size criteria for the subdivision of parent titles greater than 2 hectares in net area in the proposed Wakefield Development Area, including the introduction of Rule 16.3.3.1B. This includes provisions to ensure that the development of smaller lots in the proposed Wakefield Development Area achieve good urban design outcomes in accordance with the</p>	<p>There will be a monetary cost to the developer in designing their proposal to achieve the new minimum allotment size criteria. This cost is considered to be limited as developments require design and consenting regardless of the section sizes. The costs of the proposed requirements are expected to decrease as development firms gain experience working with them.</p> <p>The use of the urban design guide as part of the assessment of developments under the proposed requirements is not expected to result in unreasonable costs to the developer. The requirements apply to sites with a net area of over 2ha. Development of this scale generally involve a degree of urban design</p>	<p>This will benefit the existing community and future generations by ensuring a variety of lot sizes, thereby encouraging different housing typologies, to cater for different demographics and household sizes. This approach is also expected to positively contribute to efficient land use housing yield, and housing affordability. Over time this is expected to be an economic benefit.</p> <p>Environmentally the expected benefits of an increase in development intensity and variability in section sizes (and the use of the urban design guide) relate to reserve provision, flood management, ecological restoration opportunities, and the creation of quality urban environments.</p> <ul style="list-style-type: none"> • Due to the proposed level of residential density, indicative 	<p>The objective of the Plan Change is to provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area.</p> <p>The effectiveness and efficiency of the proposed policies and methods to achieve this is set out as follows:</p> <p>Effectiveness</p> <p>The proposed provisions – in particular policy 6.2.3.2B seeking efficient use of land through medium density housing and a variety of lot sizes (and associated policy 6.16.3.1B), and rule 16.3.3.1B which requires a variety of lot sizes to be achieved – are effective at achieving</p>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as:</p> <ul style="list-style-type: none"> • Community consultation and Council research, including through the Future Development Strategy 2022, has demonstrated the need to provide a variety of lot sizes and ultimately housing typologies. • Consultation with developers, and other development examples

<p>Urban Design Guide (TRMP Part II, Appendix 2), and that dam break hazard in the north-eastern corner of the site and flood hazard are appropriately addressed.</p>	<p>assessment to ensure they are well designed, attractive and functional.</p> <p>Environmentally the potential costs, or negative effects, of an increase in development intensity relate to the Pitfure Stream ecology (including sediment control during development), flooding effects and effects of residential scale development on highly productive land.</p> <ul style="list-style-type: none"> • Ecologically, the potential negative effects are to be managed through providing reserves along the stream banks. This ensures a setback is achieved and space is available for ecological restoration – noting that the stream is often dry. The site is not unusual in terms of the potential for sediment generation. Standard sediment control methods will manage this effect. • Potential flood effects are avoided through space being provided to accommodate flood flows within the Plan Change area. Management of flood effects from the development will be possible as is required by the Nelson Tasman Land Development Manual for residential development. • Effects on highly productive land are minimised through ensuring this land is efficiently used for housing; 	<p>reserves are identified to provide for this development. That provides opportunities to include additional planting and ecological restoration of riparian margins.</p> <ul style="list-style-type: none"> • The indicative reserves provide the ability to manage flood flows that cross the site, and development patterns and controls manage the generation of stormwater within the site. • The indicative reserves provide the ability to enhance biodiversity. • The use of the TRMP Urban Design Guide for designing and assessing proposals will assist with creating desirable places for people to live which function well and have a sense of community. • Part of the site is already zoned for residential development including an existing area of Residential zone land and an area of 'Rural 2 deferred Rural Residential' zoned land. The proposed provisions will make more efficient use of this area. <p>Socially, an increase in development intensity and variability in section sizes relates to a greater variety of housing that can have the following benefits:</p>	<p>the objective of the plan change. This is for the following key reasons:</p> <ul style="list-style-type: none"> • The requirement for a variety of section sizes to be created at the time of greenfield development allows planned development of this nature from the outset. • This is more effective than the alternative of standard density residential development where the market is the driver for any variation in densities. • The provisions include a clear pathway, with policy support to achieve the objectives of the Plan Change. • Use of the urban design guide is effective as it is an existing method in the TRMP and can be applied at the time of subdivision design. • Applying these provisions to sites greater than 2ha ensures smaller sites which may be less able to achieve the mix of densities required do no end up with 	<p>in the region demonstrate that a variety of section sizes can be incorporated into greenfield residential developments.</p> <ul style="list-style-type: none"> • Advice from Council specialists have confirmed that flood hazard, ecological, recreational/reserve, transport, and productive land matters can all be addressed through development in this location. • Not acting has a risk of insufficient housing capacity, and of continued standard density development.
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	<p>the land has lower productive capacity due to the existing constraints of the site (the existing Residential zoning, and Pitfire Stream) . Enabling development of this land takes development pressure off areas with more productive capacity.</p> <p>There are no identified costs or negative effects relating to social matters.</p> <p>There are no identified costs of negative effects relating to cultural matters.</p>	<ul style="list-style-type: none"> • Provision of different opportunities for future residents where a mix of small and larger properties will be available. • A more varied neighbourhood with housing available that may suit a wider variety of people leading to a wider segment of society being accommodated. <p>Increasing housing supply can assist with housing affordability (2020 Sense Partners Report).</p> <ul style="list-style-type: none"> • Opportunities for people to remain in their neighbourhood over time as their housing needs change. <p>Culturally, an increase in development intensity and variability in section sizes relates to a greater variety of housing can have the following benefits – acknowledging that these are limited:</p> <ul style="list-style-type: none"> • There is potential for a wider housing choice and the creation of communities with a heart which was identified as a need through the consultation with iwi. • The indicative reserve network proposed, due in part to the increased number of dwellings, is based on the waterways and flow 	<p>unintended design outcomes.</p> <p>Efficiency The provisions identified in this Plan Change are efficient at achieving the stated objective for the following reasons:</p> <ul style="list-style-type: none"> • The requirement for a mix of densities is based on the existing subdivision provision pathway in the TRMP. • The provisions directly require a mix of densities to be achieved through the subdivision consenting process. • Additional costs of development is expected to be limited as the development requirements are similar to what is currently required when undertaking greenfield subdivision of this scale. • The benefits of this approach outweigh the identified potential negative effects of this intensity of development. 	
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		paths. This supports the concept of Te Mana o te Wai.		
The introduction of the Wakefield Development Area and amendments to the existing Compact Density provisions to apply these provisions to the proposed Wakefield Development Area. This includes applying a non-notification provision for the use of Compact Density subdivision and land use in the proposed Wakefield Development Area.	<p>No direct or indirect monetised costs have been identified as the provisions associated with undertaken Compact Density Development. These are enabling provisions meaning that the developer can choose to use them and are not obliged to.</p> <p>The negative effects of the proposed provisions in terms of environmental, economic, social and cultural matters are the same as those identified for and increased variety of section sizes as identified above.</p> <p>The non-notification provision is not expected to result in costs, or negative effects on the wider community as higher density development is an expected outcome. Also, the existing provisions ensure that buildings on the external boundary of the Compact Density development site are treated the same as they would be if they were not a Compact Density development. Neighbouring properties do not experience a difference in terms of building bulk and location rules.</p>	<p>The benefits of the use of Compact Density provisions within this area are the same as those identified for and increased variety of section sizes as identified above.</p> <p>The key difference is these provisions is enabled rather than required. Also, a non-notification provision is applied if they are used. This results in the following additional benefits:</p> <ul style="list-style-type: none"> • Land developers can use an existing method within the TRMP to achieve a greater level of density with no limit on the minimum size of the lots. • This method ensures that the developments are well-designed and designed as an integrated package of buildings and lots. • The use of a non-notification provision is of benefit to the developer in terms of certainty of consent process, and also of benefit in terms of being able to more easily achieve the objective of the Plan Change. • This approach of enabling Compact Density development works in conjunction with the requirement to create a variety 	<p>The objective of the Plan Change is to provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area.</p> <p>The effectiveness and efficiency of the proposed policies and methods to achieve this is set out as follows:</p> <p>Effectiveness The proposed provisions effectively apply the existing Compact Density provisions in the TRMP to the proposed Wakefield Development Area. This is an effective approach due to the reliance on the existing structure within the TRMP.</p> <p>The use of a non-notified provision in relation to Compact Density developments is effective as it increases certainty for the applicant while maintaining the ability for Council to assess design outcomes and effects through the consent process.</p> <p>Efficiency The use of Compact Density provisions, including a non-notified provision, is an efficient way to achieve the objective of the Plan Change for the following reasons:</p>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods for the same reasons given above. In addition, the follow reason also applies:</p> <ul style="list-style-type: none"> • The effect of Compact Density development in the greenfield situation is to increase density and efficiency of land use. The effect on neighbouring properties is similar to that of standard density development in terms of building bulk and location on their boundaries. Therefore, sufficient information is known about the use of these existing provisions to know the risk of unintended effects is acceptable.

		<p>of lot sizes. Both approaches work towards a greater variety of housing typologies, sections sizes and an efficient use of land.</p>	<ul style="list-style-type: none"> • It uses existing provisions and is able to be voluntarily used by the developer. • This means any additional cost of designing and consenting this style of development is a known factor that forms part of the advanced planning for development viability. • Using the non-notification provision is an efficient way of improving the ability of development of this sort to achieve the objective of the Plan Change. 	
<p>Making the proposed Wakefield Development Area a deferred Fire Sensitive Area.</p>	<p>The Fire Sensitive overlay applies to the Residential Zone in the remainder of the district, and will not cause any undue costs.</p> <p>The overlay will be deferred to ensure that the relevant provisions do not apply until the Residential Zoning is in place and the deferral can be removed.</p>	<p>The Fire Sensitive overlay is used in the TRMP to manage potential adverse amenity effects from the discharge of contaminants from outdoor burning.</p> <p>Applying this overlay to the proposed Wakefield Development Area will have the benefit of:</p> <ul style="list-style-type: none"> • Ensuring consistency with the rest of the district • Managing potential adverse effects from the discharge of contaminants from outdoor burning. 	<p>This is an extension of the overlay which already applies to the remainder of the Wakefield Township, and is therefore considered to be an effective and efficient means of achieving the objective of the plan change.</p>	<p>It is considered that there is certain and sufficient information on which to base the proposed policies and methods as this is an extension of the overlay which already applies to the remainder of the Wakefield Township.</p>
Economic Growth	Economic Growth	Economic Growth		Employment

<p>and Employment</p>	<p>The proposed Wakefield Development Area is based on the Future Development Strategy 2022 T-107 Edward Street site which has been identified for urban expansion to provide sufficient capacity for projected residential growth.</p> <p>Providing for residential growth will have economic growth benefits for the region as additional homes will be able to be developed. This assists with retaining people in the region and ensuring people coming to the region can find somewhere to live.</p> <p>The construction phase of the subdivision and housing will support local contractors in this industry.</p> <p>The site is currently predominantly grazed, and has other potential rural uses, that can provide a level of employment and economic growth. Part of the rationale of this plan change is that this area has constraints in terms of its productive capacity and by efficiently developing this area other areas of highly productive land with more productive capacity are protected.</p>	<p>Providing for residential growth will have employment benefits, as it will create jobs during the development of the site and will provide places for people that currently work in the area, or that want to work in the area in the future, to live.</p> <p>Employment will also occur for the development and construction industries that are involved in residential development.</p> <p>As noted for economic growth the proposal in this area supports the protection of other areas with higher land productivity capacity. Therefore, assisting with protecting employment in those areas.</p>
<p>Overall Evaluation</p>	<p>In summary these provisions are considered to be the most appropriate way of achieving the objectives of the plan change for the following reasons:</p> <ul style="list-style-type: none"> • The provisions to achieve a variety of lot sizes will have benefits that outweigh the identified costs by creating a neighbourhood with a mixture of lot sizes. • This supports creating a variety of dwellings and living arrangement to support a range of people’s living requirements in the area. • The use of urban design guidelines is appropriate to assist with achieving well designed subdivisions with small lots. • Enabling the use of Compact Density development provisions allows for efficient and well-designed use of the land for residential growth, and uses existing provisions in the TRMP is consistency. • A non-notification provision in relation to Compact Density is appropriate due to the need to encourage increased density and the existing controls in relation to external boundary effects. • The methods to increase density of residential development in the area make more efficient use of the rural land that is being rezoned and existing residential zoned land that is yet to be developed. • Efficient use of this rural land for housing takes development pressure off rural land with higher productive capacity. • The indicative reserve and associated walkway layout respond to the need to manage flood hazard on the site, provide for connectivity, provide for neighbourhood parks and green space, and for ecological protection and restoration. • Provisions are included to manage potential adverse effects including dam break hazard in the north-eastern corner of the site and flood hazard. • The deferred Fire Sensitive Area is appropriate as it is consistent with other Residential Zoned areas in the district and will manage potential adverse effects from the discharge of contaminants from outdoor burning. • Overall the proposed provisions are the most appropriate way to achieve the objective of the plan change which is to provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area. 	

10. Conclusion

This evaluation has been undertaken in accordance with Section 32 of the RMA in order to identify the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA. The evaluation demonstrates that this proposal is the most appropriate option as:

- The provisions to achieve a variety of lot sizes will have benefits that outweigh the identified costs by creating a neighbourhood with a mixture of lot sizes.
- This supports creating a variety of dwellings and living arrangements to support a range of people's living requirements in the area.
- The use of urban design guidelines is appropriate to assist with achieving well designed subdivisions with small lots.
- Enabling the use of Compact Density development provisions allows for efficient and well-designed use of the land for residential growth, and uses existing provisions in the TRMP in consistency.
- A non-notification provision in relation to Compact Density is appropriate due to the need to encourage increased density and the existing controls in relation to external boundary effects.
- The methods to increase density of residential development in the area make more efficient use of the rural land that is being rezoned and existing residential zoned land that is yet to be developed.
- Efficient use of this rural land for housing takes development pressure off rural land with higher productive capacity.
- The indicative reserve and associated walkway layout respond to the need to manage flood hazard on the site, provide for connectivity, provide for neighbourhood parks and green space, and for ecological restoration.
- Provisions are included to manage potential adverse effects including dam break hazard in the north-eastern corner of the site and flood hazard.
- The deferred Fire Sensitive Area is appropriate as it is consistent with other Residential Zoned areas in the district and will manage potential adverse effects from the discharge of contaminants from outdoor burning.
- Overall, the proposed provisions are the most appropriate way to achieve the objective of the plan change which is to provide for housing and encourage intensification and a variety of densities within the proposed Wakefield Development Area.

Appendix 1 – 2020 Sense Partners Report ‘Understanding the impacts of releasing greenfields sites for development’

Appendix 2 – Background Report

Appendix 3 – Engagement Summary

The table below provides a summary of the pre-public notification engagement undertaken on this Plan Change. This includes an overview of who was engaged, how, and what feedback was received.

Iwi Engagement

Person/Party	Engagement Undertaken	Feedback Received
Iwi Partnership Working Group	<p><i>Round 1 Engagement (November 2021):</i></p> <p>A hui was held on 17 November 2021, and was attended by the following;</p> <ul style="list-style-type: none"> • Onur Oktem (Te Rūnanga o Toa Rangatira); • Julia Eason (Ngāti Kuia); and • Sylvie Heard (Te Atiawa). <p>Apologies and absences were noted for the following invited iwi representatives;</p> <ul style="list-style-type: none"> • Ngāti Tama • Ngāti Kōata • Ngāti Apa • Ngāi Tahu • Ngāti Rarua <p><i>Round 2 Engagement (March – April 2022):</i></p> <ul style="list-style-type: none"> • An email update was sent to Te Tau Ihu iwi on 23 March 2022. <p><i>Circulation of Plan Change Material (June 2022):</i></p> <p>The draft plan change material (Schedule of Amendments and update maps) was sent to iwi authorities on 30 June 2022.</p>	<p><i>Round 1 Engagement (November 2021):</i></p> <p>From the hui on 17 November 2021, the following general comments were noted in relation to Council’s residential growth planning projects, including this Plan Change:</p> <ul style="list-style-type: none"> • Create communities with a heart/ commercial centre (long-term vision). • Implement Te Mana o te Wai • Iwi placenames • Good to have some guiding development principles. • Allow for larger families/ multi-units. <p>No specific comments were noted in relation to Wakefield.</p> <p><i>Round 2 Engagement (March – April 2022):</i></p> <ul style="list-style-type: none"> • No comments were received with regards to the email sent on 23 March 2022. <p><i>Circulation of Plan Change Material (June 2022):</i></p> <p>Feedback was received from Ngati Tama on the 20 July 2022. Feedback included reference to effects on water quality, the physical structure and hydraulic characteristics of waterbodies and the health of aquatic plants and animals and sedimentation. The plan change has addressed the potential waterway effects through the inclusion of an indicative reserve along Pitfure Stream which provides a development buffer/setback to protect waterways values. Other issues raised include disturbance to soil and associated ecosystems, catchment management and stormwater</p>

management. As part of this Plan Change the zoning of the land is deferred and will not be lifted until Council is satisfied with stormwater and catchment management. Issues surrounding earthworks will be managed at the subdivision stage.

Landowners and Key Developers

Person/Party	Engagement Undertaken	Feedback Received
Adjoining Landowners	<p><i>Round 2 Engagement (March-April 2022):</i></p> <ul style="list-style-type: none"> Letters were sent to adjoining landowners in March 2022. 	<p><i>Round 2 Engagement (March-April 2022):</i></p> <ul style="list-style-type: none"> No specific feedback received from adjoining landowners
Landowner (Plan Change site)	<p><i>Prior to commencement of Plan Change:</i></p> <ul style="list-style-type: none"> Council have previously discussed with landowner's planner. <p><i>Round 1 Engagement (November 2021):</i></p> <ul style="list-style-type: none"> Various phone calls and emails. Discussion regarding draft scheme plan. In-person meeting with landowner and his planner on 17 November 2021. <p><i>Round 2 Engagement (March-April 2022):</i></p> <ul style="list-style-type: none"> Video call meeting with landowner and their planner on 2 March 2022 to talk through proposed provisions and indicative items. Various phone calls and emails. 	<p><i>Round 1 Engagement (November 2021):</i></p> <ul style="list-style-type: none"> Planning to develop artificial wetlands for stormwater management and amenity/ecological reasons. Working with T&T on flood modelling, and with an ecologist on riparian values. Open to higher density in the right areas, not right across the site. Happy to work collaboratively with Council. <p><i>Round 2 Engagement (March-April 2022):</i></p> <ul style="list-style-type: none"> Comfortable with indicative roads. Comfortable with new indicative reserves shown, however, question the 20m esplanade reserve strip – don't want to take up housing capacity. Looking at lodging RC application for the subdivision of the existing residential area, to continue the development of the area. Looking at some compact density, the amount depends on demand. Also interested in larger lots that can have multiple dwellings for flexibility.

Person/Party	Engagement Undertaken	Feedback Received
	<p><i>Circulation of Plan Change Material (June 2022):</i></p> <p>Draft plan change material (Schedule of Amendments and update maps) sent to landowner on 1 July 2022.</p>	<ul style="list-style-type: none"> • Supportive of enabling intensification but not of it being required. Question infrastructure capacity to support intensification. <p><i>Circulation of Plan Change Material (June 2022):</i></p> <ul style="list-style-type: none"> • Questioned whether the existing indicative roads need to be amended • Raised concern over the indicative reserve around the existing oak tree. • Raised concern over the requirement for smaller lots. Considers the requirement for combined 40% of allotments to be smaller to be too high, and that 20% would be more appropriate in this location. • Suggested that second dwellings also be allowed for. • Requested a small extension to the proposed development area.

Community Engagement

Person/Party	Engagement Undertaken	Feedback Received
<p>Wakefield community, including the Wakefield Community Council and Homes for Wakefield Sub-Committee, as well as general feedback from members of the wider community and adjoining landowners</p>	<p><i>Round 1 Engagement (November 2021):</i></p> <ul style="list-style-type: none"> • Presented to the Wakefield Community Council • Website • Letters sent to adjoining landowners in March 2022 	<p><i>Round 1 Engagement (November 2021):</i></p> <ul style="list-style-type: none"> • Support for smaller lots to accommodate the elderly. • Support for intensification, quality design and the efficient use of greenfield land. • Would like options for multiple dwellings per site and tiny homes. • Questions regarding infrastructure, particularly stormwater and wastewater capacity. • Would like Higgins Road to be used for more than just emergency access.

Person/Party	Engagement Undertaken	Feedback Received
	<p><i>Round 2 Engagement (March-April 2022):</i></p> <ul style="list-style-type: none"> Joint Future Development Strategy/ Growth Plan Change online webinars, for the community associations and wider public. Website and online feedback form. <p>Information on the growth plan change communicated, along with information on the Future Development Strategy, via Council Communication Channels e.g. Newsline, social media etc.</p>	<ul style="list-style-type: none"> Important to protect the international dark sky reserve. <p><i>Round 2 Engagement (March-April 2022):</i></p> <ul style="list-style-type: none"> Seek dark sky protection Concern about flooding in Higgins Road area Affordability is a concern Interested in the concept of mandatory density versus enabling density Questioned whether Pearless Place land is included in the plan change. Seeking inclusionary zoning to be included. Improve road safety and concern around additional traffic, including will road access be available along Higgins Road. Variety of housing types and sizes are sought – Homes for Wakefield Survey

External Infrastructure and Service Providers

Person/Party	Engagement Undertaken	Feedback Received
<p>External Infrastructure and Service Providers:</p> <ul style="list-style-type: none"> Transpower Network Tasman Delta Chorus Civil Defence Fire and Emergency Nelson Tasman Regional Sewer Business 	<p><i>Round 1 Engagement (November 2021):</i></p> <ul style="list-style-type: none"> Initial email advising of the plan change and seeking any questions or comments. Various emails and phone calls. Meetings arrangement upon request: <ul style="list-style-type: none"> Video call meeting with Waka Kotahi NZ Transport Agency on 1 November 2021. 	<p><i>Round 1 Engagement (November 2021):</i></p> <ul style="list-style-type: none"> Waka Kotahi advised of support for intensification of existing residential areas, the need to consider the cumulative effects of development, and the need to engage with iwi. Also site-specific feedback received through the IAF process. Transpower advised that the site does not contain National Grid Assets. Delta advised that they have no comment on the re-zoning, however, would like to be kept informed. Chorus advised that the site is able to be serviced.

Person/Party	Engagement Undertaken	Feedback Received
<p>Unit</p> <ul style="list-style-type: none"> • Ministry of Education • Waka Kotahi NZ Transport Agency 	<p><i>Round 2 Engagement (March – April 2022):</i></p> <ul style="list-style-type: none"> • A follow up email, providing an update on the plan change and either following up on any feedback, or (where applicable) advising how the early feedback has been incorporated or if the changes affect this early feedback. • Video call meeting with Civil Defence on 7 April. 	<ul style="list-style-type: none"> • The Nelson Tasman Regional Sewer Business Unit advised that they have no comments at this time. • The Ministry of Education advised that they are interested in the anticipated number of dwellings. <p><i>Round 2 Engagement (March – April 2022):</i></p> <ul style="list-style-type: none"> • Network Tasman advised that they do not have any concerns. • Civil Defence have not raised any significant concerns.

Appendix 4 – Operative Regional Policy Statement and Resource Management Plans

The relevant Objectives, Policies, and methods in the operative Tasman Regional Policy Statement and the TRMP are identified in the table below. These are provided due to the relevance of understanding the current regulatory framework for managing the issues identified.

Policy/Objective/Method	Relevance
Tasman Regional Policy Statement	
<p>General Objective 2A: <i>For the period 2021 to 2051, the minimum sufficient development capacities for housing in the Tasman portion of the Nelson-Tasman Urban Environment are provided.</i></p> <p>Objective 5.5: <i>Maintenance and enhancement of urban environmental quality, including amenity values and the character of small towns.</i></p>	<p>Providing for residential growth:</p> <p>Objective 2A is particularly relevant as this Plan Change is based on the T-107 Edward Street site identified in the Future Development Strategy 2022 to contribute to residential capacity to meet growth projections.</p> <p>Objective 5.5 is relevant in terms of the need to ensure good design outcomes. This is provided for through indicative reserves and design in accordance with the Urban Design Guide (TRMP Part II).</p>
<p>General Objective 3: <i>Avoidance, remedying or mitigation of the adverse effects on the environment and the community from the use, development or protection of resources.</i></p>	<p>Managing adverse effects.</p>
<p>General Objective 4: <i>Efficient use and development of resources.</i></p>	<p>Ensuring efficient land use.</p>
<p>Objective 5.1: <i>Avoidance of the loss through urban development, of the potential of land having high productive value to meet the needs of future generations.</i></p>	<p>Protecting productive land: This is relevant as part of the site is currently zoned Rural 2, however, the site is considered to have limited productive capacity.</p> <p>This is also relevant Plan Change’s intent of ensuring efficient land use through medium density development.</p>
<p>Policy 5.2: <i>The Council will avoid locating new urban development in areas subject to natural hazards, except that extensions in areas that are so subject may be allowed provided adequate mitigation measures are undertaken.</i></p>	<p>Managing potential flood hazard.</p>
Tasman Resource Management Plan	
<p>Policy 5.2.3.7: <i>To enable a variety of housing types in residential and rural areas.</i></p> <p>Policy 5.3.3.1A: <i>To enable medium density housing with a high standard of amenity in specified locations.</i></p> <p>Method of Implementation 5.3.20.1: <i>Rules relating to:</i></p> <ul style="list-style-type: none"> • <i>allotment size and intensity of site development;</i> • <i>location, design and appearance of buildings and signs;</i> • <i>location of classes of activities and effects;</i> • <i>heritage, vegetation and landscape features.</i> <p>Policy 5.4.3.1: <i>To enable a variety of housing types, recognising different population growth characteristics,</i></p>	<p>Providing for residential growth: These provisions relate to the need to provide housing, including medium density housing options, and to ensure good design outcomes.</p>

Policy/Objective/Method	Relevance
<p><i>age, family and financial circumstances and the physical mobility of, or care required by, residents.</i></p> <p>Objective 6.1.2.2: <i>A wide range of living opportunities in urban locations that incorporate urban design principles.</i></p> <p>Policy 6.1.3.1: <i>To encourage subdivision and development to incorporate sustainable urban design principles by:</i></p> <ul style="list-style-type: none"> <i>(a) encouraging a sense of place and identity;</i> <i>(b) working with the natural characteristics of sites;</i> <i>(c) creating opportunities to enhance natural values;</i> <i>(d) providing a high degree of connectivity within road networks;</i> <i>(e) providing for safe walking and cycling;</i> <i>(f) designing local roads to ensure a safe low traffic speed environment on local streets and accessways;</i> <i>(g) creating a streetscape which enhances perceptions of safety;</i> <i>(h) managing stormwater run-off on site where possible, and ensuring off-site stormwater run-off does not increase flood risk nor adversely affect water quality in waterways and the coastal marine area for aquatic ecosystems and recreation; and</i> <i>(i) locating and designing development to address cross-boundary effects between land uses.</i> <i>j) encouraging medium density housing development in the forms of compact density and comprehensive housing and intensive residential development within walking distance of or close to town centres and urban facilities, including public transport.</i> <i>(k) providing for a choice of residential density and form within the District, taking into account people’s preferences, the existing character of neighbourhoods, topography, proximity to town centre, the capacity of infrastructure and the constraints of the land resource.</i> <i>(l) enabling protection of heritage sites, items and values, cultural heritage and protected trees</i> <p>Objective 6.2.2.2: <i>Urban growth and sufficient opportunities, including redevelopment opportunities that encourage more efficient use of land, energy and provision of infrastructure, services and amenities.</i></p> <p>Objective 6.2.2.3: <i>For the period 2021 to 2051, the minimum sufficient development capacities for housing in the Tasman portion of the Nelson-Tasman Urban Environment are provided.</i></p> <p>Method of Implementation 6.2.20.1(g): <i>Subdivision and zone rules and an urban design guide that manage medium density development.</i></p> <p>Policy 6.7.3.2: <i>To identify land for future subdivision, and regulate the form of development, so that the particular character and appearance of each existing settlement is not compromised.</i></p>	

Policy/Objective/Method	Relevance
<p>Policy 6.17.3.1: <i>To ensure suitable land and infrastructure is available in Wakefield for residential and business use, and active and passive recreation needs.</i></p> <p>Policy 6.17.3.7: <i>To encourage a diversity of lot sizes and a range of housing forms to facilitate well designed, lower cost housing development close to the village centre.</i></p>	
<p>Policy 6.1.3.1A: <i>To encourage medium density housing developments that achieve a high standard of amenity in areas identified on the planning maps as the Richmond South, Richmond West, Mapua Special and Richmond Intensive development areas and the Motueka West Compact Density Residential Area by:</i></p> <p><i>(a) ensuring the suitable and compatible location, height, density, scale and bulk of intensive residential development relative to its context and adjacent land uses, including streets and reserves.</i></p> <p><i>(b) encouraging best practice and design through the use of the Council’s Urban Design Guide.</i></p> <p>Policy 6.2.3.2A: <i>To encourage and promote medium density development that achieves a high standard of amenity in areas specified on the planning maps as the Richmond South, Richmond West, Mapua Special and Richmond Intensive development areas and the Motueka West Compact Density Residential Area.</i></p>	<p>Compact Density: These provisions are proposed to apply to the Wakefield Development Area.</p>
<p>Policy 6.1.3.2: <i>To integrate the management of stormwater run-off with the maintenance and enhancement of natural waterways, vegetation and wetlands, and co-locate provision of passive recreational opportunities, and pedestrian and cycle access.</i></p> <p>Policy 6.3.3.7: <i>To require developers to adopt appropriate management methods to avoid or mitigate the adverse effects of stormwater run-off.</i></p> <p>Policy 6.17.3.2: <i>To avoid flood hazard risk when enabling urban development of land.</i></p>	<p>Managing stormwater: This is relevant as the Plan Change needs to include provision to ensure the appropriate management of stormwater.</p>
<p>Objective 6.2.2.1: <i>Urban growth that avoids or mitigates the loss of land of high productive value and the risks of extending onto land subject to natural hazards.</i></p> <p>Policy 6.2.3.3: <i>To minimise the loss of land of high productive value in allowing for further urban development, while having regard to:</i></p> <p><i>(a) the efficient use of resources, including land, infrastructure, and energy;</i></p> <p><i>(b) the quality of the urban environment.</i></p> <p>Objective 6.3.2.2: <i>Retention of opportunities for efficient future urban purposes on rural land that is identified for future urban use and development but deferred for this purpose, while enabling rural activities for the time it remains deferred.</i></p> <p>Objective 7.1.2: <i>Except where rural land is deferred for urban use, avoid the loss of potential for all rural land of existing and potential productive value to meet the needs of future generations, particularly land of high productive value.</i></p>	<p>Protecting productive land: This is relevant as part of the site is currently zoned Rural 2, however, the site is considered to have limited productive capacity.</p> <p>This is also relevant Plan Change’s intent of ensuring efficient land use through medium density development. This will protect areas of higher productive capability.</p>

Policy/Objective/Method	Relevance
<p>Objective 7.1.2.2: <i>Retention and enhancement of opportunities for plant and animal production on land with high productive value in the District, identified as the Rural 1 Zone.</i></p> <p>Policy 7.1.3.1: <i>To avoid, remedy or mitigate the adverse effects of subdivision of rural land, particularly land of high productive value.</i></p> <p>Policy 7.1.3.3: <i>To avoid, remedy or mitigate adverse actual, potential, and cumulative effects on the rural land resource.</i></p> <p>Policy 7.1.3.4: <i>To avoid, remedy or mitigate the potential for reverse sensitivity on plant and animal production in the Rural 1, Rural 2 and Rural 3 zones.</i></p> <p>Objective 7.2.2.1: <i>Retention of opportunities to use rural land for activities other than plant and animal production, including rural living, rural residential, rural industrial, tourist services and papakainga activities in restricted locations, while avoiding the loss of land of high productive value.</i></p> <p>Policy 7.2.3.6: <i>To minimise the potential for conflict between rural and residential activities by way of setbacks from boundaries and separation between incompatible uses.</i></p> <p>Policy 7.4.3.9: <i>To ensure that adequate physical or spatial buffers or other techniques are applied when allowing new allotments or buildings primarily or exclusively for residential purposes in rural areas, so that productive land use opportunities are not compromised.</i></p>	