

Tasman Resource Management Plan PC76: Wakefield Growth Plan Change

**Report prepared to fulfil the requirements of Section 42A of the
Resource Management Act 1991**

May 2024

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1.0 Introduction

1.1 Purpose of the Report

This officer's report is prepared under Section 42A of the Resource Management Act 1991 (RMA) and discusses matters raised in submissions on Proposed Plan Change 76 – Wakefield Growth Plan Change (PC76). It includes recommendations on these submissions for the Hearing Panel.

Section 32AA of the RMA requires further evaluation by the Hearing Panel of any changes made to PC76 following consideration of the matters raised in the submissions. To the extent that changes are recommended in this report, further evaluation has been undertaken to support completion of a report under Section 32AA by the Hearings Panel. A Section 32AA (s32AA) Evaluation Report is attached as Appendix 2.

Under Clause 10 of the First Schedule of the RMA, Council is required to give reasons for its decisions on PC76. This report is also written to assist the Hearing Panel with drafting reasons for the decision.

1.2 Reporting Officer

This report has been prepared by Anna McKenzie, Principal Planner, working for Tasman District Council (Council). I have been responsible for managing this plan change for Tasman District Council. I have been assisted with the preparation of PC76 through the preparation, consultation and notification stages by Jeremy Butler – Team Leader Urban Environmental Policy and Consultant Planners Reuben Peterson and Nicole White. I have also been assisted by Narissa Armstrong, Council's Environment Policy Administration Officer and various council technical specialists.

I have a Bachelor of Resource Studies (Hons) from Lincoln University and have worked in the resource management planning field since graduating in 1999, both for local authorities and private consultancies. I confirm that I have read the 'Code of Conduct' for expert witnesses contained in the Environment Court Practice Note 2023 and that this report and my appearance at the hearing will be carried out in accordance with the Code of Conduct.

Advice on various aspects of the development of the PC76 provisions has been received from Council staff. This has included Glenn Stevens – Tasman District Council (TDC) Senior Natural Resource Scientist; Rosalind Squire – Contract Reserves Planner; Wouter Woortman – Contract Principal Water Resource Consultant; Bill Rice (and Drew Bryant, resigned) – TDC Senior Infrastructure Planning Advisor Transportation, Jacqui Deans – TDC Growth Coordinator and Kim Arnold - TDC Infrastructure Planning Advisor.

Due to the nature of the submissions and the matters to be considered at the hearing, the following staff will attend the hearing: Jeremy Butler – TDC Team Leader Urban Environmental Policy; Bill Rice – TDC Senior Infrastructure Planning Advisor Transportation; Glenn Stevens – TDC Senior Natural Resource Scientist – Hazards; Rosalind Squire – Contract Reserves Planner; Wouter Woortman- Contract Principal Water Resource Consultant and Jacqui Deans – TDC Growth Coordinator.

1.3 Scale & Significance

This report has been prepared with consideration of the scale and significance of the amendments requested to PC76.

The Section 32 (s32) Evaluation Report for PC76 was developed to a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from implementation of the proposal.

This Section 42A (s42A) Report follows the same approach and covers each relevant submission point in a degree of detail appropriate to the scale and significance of the effects anticipated. This includes those effects on both the submitter themselves and the wider environmental, economic, social, and cultural effects as they are relevant to the particular proposed change and submission point.

1.4 Report Overview

The report addresses the following:

- **Section 1 – Introduction.** Introduces PC76 and provides background to the plan change and briefly covers the submissions made on it.
- **Section 2 – Evaluation of Submissions and Recommendations.** This section discusses and provides recommendations to the Hearing Panel regarding PC76 and for the amendments sought in the submissions. Reasons for recommending accepting or rejecting submissions points are also given.

1.5 Background

PC76 seeks to provide additional land for residential housing and encourage both intensification and a variety of densities within a parcel of greenfield land in Wakefield (in single ownership) that is partially zoned Residential, Rural 2 and Rural 2 deferred Rural Residential. PC76 proposes to rezone the land Residential and Deferred Residential. The deferral will be subject to reticulated wastewater, stormwater, water supply and transport matters.

The land area is approximately 33 hectares, located between Pitfure Road and Whitby Road (SH6) to the north, Edward Street to the south, and Higgins Road. It is bisected by Pitfure Stream.

PC76 is responding to:

- The direction given in the Nelson Tasman Future Development Strategy 2022 – 2052 (FDS), which has identified the majority of the land in the plan change area, which is not already zoned Residential or deferred Rural Residential, for residential use.
- Region-wide issues around the need to provide for population growth (including through greenfield development – refer to the Sense Partners report ‘Understanding the impacts of releasing greenfields sites for development’ in Appendix 9).
- Strong feedback from the Wakefield Community Council and Homes for Wakefield Sub-Committee on the need for an increased variety of housing availability.

Technical information used to inform the development of PC76 is contained in the s32 Evaluation Report which is appended to this report - Appendix 9.

1.5.1 Development Area and Compact Density Provisions

The objective of PC76 is to provide additional land for residential housing and encourage both intensification and a variety of densities. This objective aligns with the FDS which identifies the majority of PC76 land for residential expansion.

The area is made up of:

- Residential zoned land on the north-western side of the site.
- Rural 2 zoned land, immediately either side of Pitfure Stream.

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

The key aspects of PC76 are summarised as follows:

- PC76 is seeking to create a new development area, entitled the ‘Wakefield Development Area’.
- PC76 is seeking to encourage medium density housing by applying the Tasman Resource Management Plan’s (TRMP) existing Compact Density provisions to the site, with an additional non-notification provision to incentivise the use of the Compact Density provisions.
- PC76 is seeking to require a percentage of allotments to be smaller than standard residential allotments for the subdivision of sites greater than 2 hectares.
- The following existing and new indicative items are included in PC76;
 - A new indicative road, connecting the existing indicative road to Higgins Road (emergency access only) and to the adjoining land to the north-east which is an area of land identified in the FDS 2022 (T-194 Whitby Road).
 - A realignment of the existing indicative walkway that connects the existing indicative road to Pitfure Road at the north-western end of the site.
 - A new indicative reserve running along either side of Pitfure Stream and Gossey Stream.
 - 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.
- Inclusion of the Wakefield Development Area as a deferred Fire Sensitive Area. This is an extension of the overlay which already applies to the remainder of the Wakefield Township and includes existing TRMP provisions to manage potential adverse amenity effects from the discharge of contaminants from outdoor burning.

Changes are recommended within this S42a Report in response to submissions. These changes are set out in the Recommendation Sections of the Report.

1.6 Consultation

Consultation on PC76 has included two main phases:

- Pre-notification consultation, including the circulation of plan change draft material; and
- Schedule 1 consultation.

1.6.1 Pre-notification Consultation

This phase consisted of targeted engagement with those identified as being directly affected by the Proposed Plan Change including Te Tauihu Iwi and landowners. Consultation was carried out through letters and emails. Follow up correspondence and discussions were held with various parties including the circulation of draft PC76 text and mapping where this was relevant.

Council staff and consultants attended Wakefield Community Council meetings and held a hui with Te Tauihu Iwi to discuss the proposal. General information on PC76 was also included within Tasman District Council’s fortnightly publication ‘Newslines’. Workshops were also held with Tasman District Councillors to discuss the changes proposed and receive feedback.

Section 3 of the s32 Evaluation Report outlines specific consultation actions in more detail.

1.6.2 Schedule 1 Consultation

Council has undertaken consultation under Schedule 1, Clause 3 of the RMA. This includes consulting with the Minister for the Environment, adjoining local authorities and sending the draft PC76 material to the iwi of Te Taihū on 30 June 2022. No advice was received from iwi or the Minister for the Environment in relation to the matters within PC76. All consultation and notification requirements of Schedule 1 of the RMA have been met through this process.

The s32 Evaluation Report was released publicly during the Schedule 1 Consultation. The appendices to this report were mistakenly not included in the s32 Evaluation Report that was publicly released. These appendices were identified in the index of the s32 Evaluation Report and were made available on request. All appendices are now included within this report for completeness (Appendix 9).

1.7 Plan Change Process

On 18 August 2022, the Strategy and Policy Committee recommended that PC76 be notified.

On 16 September 2022, PC76 was publicly notified with submissions closing on 17 October 2022. Eight submissions were received and are outlined in Table 1 below.

The summary of decisions sought was publicly notified on 28 October 2022 with the further submission period closing on 11 November 2022. Further submissions were received from two original submitters and one new party. A copy of the submissions and further submissions can be found in Appendix 3. Table 1 and 2 below provides the names of the submitters and further submitters.

Section 2 of this report discusses the submissions and further submissions and includes recommendations regarding the decisions sought.

A copy of the recommended changes to the TRMP Schedule can be found in Appendix 1.

Table 1: Submitters

Submission No.	Submitter Name
3653	Jean Gorman
4209	Homes for Wakefield
4210	Daniel & Katherine McKay
4211	Wakefield Village Development Ltd
4206	Waka Kotahi
4207	Neil Kitchen
4154	Peter Carmody
4208	Chris & Lesley Olaman

Table 2: Further Submission Points

Further Submission No.	Further Submission Name
FS76.4211.1-8	Wakefield Village Development Ltd
FS76.4214.1	S Collett
FS76.3653.1	Jean Gorman

2.0 Evaluation of Submissions and Recommendations

2.1 Introduction

This section divides the issues raised in the submissions into separate topics and then discusses the matters raised in each topic and provides recommendations to the Hearing Panel. These recommendations include the response to the submission and may also identify recommended changes to the PC76 provisions that were notified. Reasons for the response and any recommended changes will be given along with an assessment of those changes in accordance with RMA Section 32AA. The s32AA Evaluation Report is included in Appendix 2.

The topics under which the submissions and further submissions are grouped are set out below. The numbering is derived from the topic number and submitter numbers in the summary of submissions.

- 76.0 General
- 76.2 Definitions
- 76.5 Site Amenity Effects
- 76.6 Urban Environment Effects
- 76.16 Subdivision
- 76.17 Zone Rules
- 76.19 Information Requirements
- 76.PA.A2 Part II - Appendix 2 Urban Design Guidelines

Subject to decisions being made on the recommended changes set out below, it is recommended that the Proposed Plan Change is approved.

2.2 Topic 76.0: General

2.2.1 Submission Requests

This topic includes submitter requests for amendments both supporting and opposing the proposed changes to introduce additional indicative roads and reserves. Submissions were also made on the location or existence of existing indicative roads and reserves (and walkways) and the identified area of the Residential Zone and the Wakefield Development Area. The topic of natural hazards has also been included under Topic 76.0.

2.2.1.1 Submitter 3653: Jean Gorman

- **Submission Point 76.0-1 – Support:** the reserve status of the grove of mature trees shown on Map 26/1
- **Submission Point 76.0-2 – Support in part:** Seeks amendment to include, beside the cycle track to Edwards Road, an area of amenity space and planting rather than having housing located up to the cycleway boundary.
- **Submission Point 76.0-3 – Support in part:** Seek inclusion and protection of the Totara Tree located near the corner of Edward Street and Great Taste Trail as shown on Area Map 76/1.
- **Submission Point 76.0-4 – Support in part:** Seeks inclusion of the Hawthorn Hedge in the Oak Tree indicative reserve on Area Map 76/1.

Submitter’s Reason: Protect significant vegetation and habitat for native species and retain the amenity outlook for cyclists using the Great Taste Trail.

- **Submission Point 76.0-5 – Support in part:** Housing footprints should be limited to be located beside the existing road at Edwards Street.

Submitter’s Reason: Inundation during large rainfall events from Jenkins Creek, Pitfure Stream and the creek from Gossey Drive.

- **Further Submissions FC76.4211.1, 2 and 3; Wakefield Village Development Ltd – Oppose:**
 - Submission Point 76.0-3 – The Totara Tree has been removed from the site.
 - Submission Point 76.0-4 – The Hawthorn Hedge is not considered worthy of protection.
 - Submission Point 76.0-5 – The Nelson Tasman Land Development Manual provides appropriate framework for managing flood hazard.

2.2.1.2 Submitter 4209: Homes for Wakefield

- **Submission Point 76.0-6 – Support in Part:** Believe additional consultation should have occurred for the plan change including holding public meetings and providing more lead in time for the Wakefield Community Meeting in September.

Submitter’s Reason: Sufficient time was not allowed for public involvement in the plan change.

2.2.1.3 Submitter 4210: Daniel and Katherine McKay

- **Submission Point 76.0-7 – Object in part:** Object to the distance of the indicative road from their property boundary, concerns about privacy and noise. Also request that the existing spring fed stream behind their property is identified.

Submitter’s Reason: Privacy and noise from road traffic and would like to understand if the stream would be filled in.

- **Further Submission FC76.4211.8 – Wakefield Village Development Ltd - Oppose:**
 - Submission point 76.0-7 - is opposed by the further submitter on the basis that the stream is a swale which only holds water during high rainfall events and the land is already zoned residential.

2.2.1.4 Submitter 4211: Wakefield Village Development Ltd

- **Submission Point 76.0-8 – Support in Part:** Mapping amendments sought to align with the landowner’s conceptual masterplan and its alignment of indicative walkways, roads, and reserves.
- **Submission Point 76.0-9 – Support in Part:** Amendment sought;
 - a) Amend the current Residential Zone boundary to follow the existing upper terrace (western side) of the Pitfure Stream.
 - b) Amend the boundary of the Wakefield Development Area to exclude part of the current residentially zoned land.
- **Submission Point 76.0-10 – Support in Part:** Amend and update Map 76/3 in accordance with the plan attached to the submission and adjust to follow the final boundary of the current residential zone (top of terrace).

Submitter’s Reason: Alignment with landowner’s concept masterplan.

- **Further Submissions FC76.3653.1; Jean Gorman – Oppose:**
 - Submission Point 76.0-3 – Expressed sadness at removal of Totara Tree.
 - Submission Point 76.0-5 – More information provided on the flooding impacts from Pitfure Stream, Jenkins Creek and Gossey Stream.

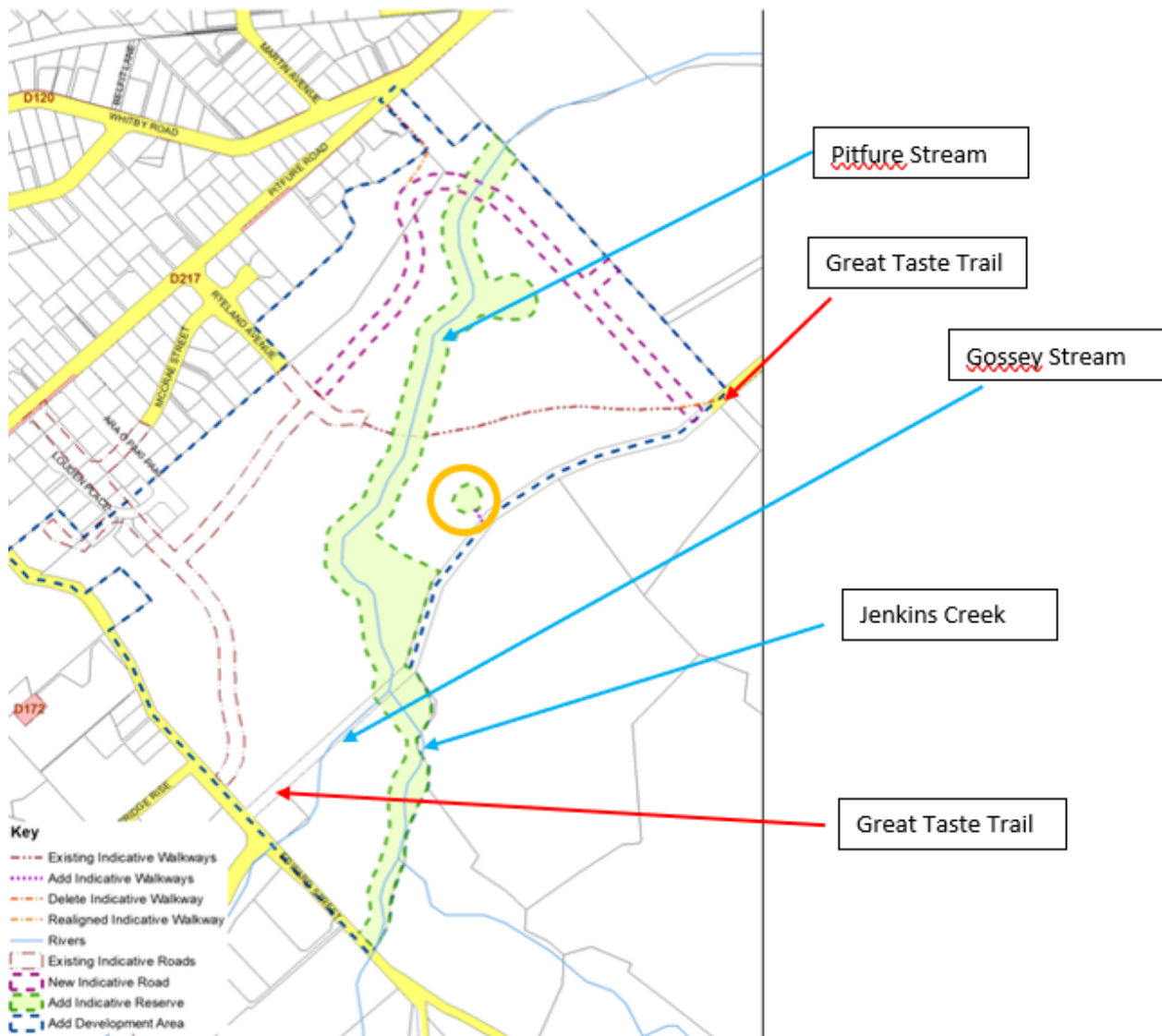
2.2.2 Reporting Officer Assessment and Recommendations

2.2.2.1 Discussion and Reasons

Submission Point 76.0-1 (Jean Gorman) Supports the reserve status of the grove of mature trees shown on Map 26/1. It is recommended that this submission point is accepted.

Submission Point 76.0-2 (Jean Gorman) seeks an amendment to the proposed indicative items (Area Map 76/1) to include additional amenity/reserve areas adjoining the Tasman Great Taste Trail where it connects to Edward Street. Figure 1 identifies the Tasman Great Taste Trail referred to in Submission Point 76.0-2.

Figure 1: Indicative Items Update Area Map 76/1: Submission Point 76.0-2 (Red arrows identify cycle trail); Submission Point 76.0-4 (Orange Circle Oak Tree).



Further submission FC76.3653.1 (Jean Gorman) states that;

'the Gossey Stream flows beside the cycleway and along the cycleway when in flood. A riparian strip is needed both to accommodate this flow and to recognize that the Great Taste Trail is a tourist attraction...Jenkins Creek also floods across this paddock in heavy rain'.

Further submission FC76.4211.8 (Wakefield Village Development Ltd) states that;

'the subject portion of land is practical to develop for residential purposes and that the Nelson Tasman Land Development Manual (NTLDM) provide(s) an appropriate framework for managing flood hazards in the development process. However, this creek is likely to be subject to the esplanade provisions in the TRMP when it is developed.'

Gossey Stream will be subject to esplanade provisions because it is greater than 3 metres at its annual fullest flow. The Council's Reserves Team support an amendment of Area Map 76/1 to include an indicative reserve of 20m from the top of each bank of Gossey Stream (where the stream is located within the Wakefield Development Area) - Refer to Appendix 4 for amendments to Area Map 76/1 and Appendix 6 for

Supporting Evidence - Reserves. Further information associated with the flood hazard risk is included in response to Submission Point 76.0-5 (page 11) and within Appendix 5, Supporting Evidence – Stormwater.

Gossey Stream partially adjoins the Tasman Great Taste Trail and the creation of an esplanade reserve along it will create additional public recreational areas and a setback from the majority of the Tasman Great Taste Cycle Trail where it adjoins Gossey Stream, which will (partially) meet the relief sought by Submission Point 76.0-2.

It is recommended that Area Map 76/1 is amended to include an indicative reserve adjoining Gossey Stream (where it extends through the Wakefield Development Area) and that submission point 76.0-2 is accepted.

Submission Point 76.0-3 (Jean Gorman) seeks the inclusion and protection of an isolated Totara Tree located near the corner of Edward Street and the Tasman Great Taste Trail as identified in Figure 2 and 3 below.

- **Further Submission Point FC76.4211.1** (Wakefield Village Development Ltd) states that the Totara Tree has been removed from the site.

Figure 2: *Isolated Totara Tree; Photo extracted from Submission 3653.*



Figure 3: Isolated Totara tree (Red Circle).



The Totara tree is not a notable tree protected under the TRMP and has been removed from the site. This is confirmed by the landowner through their further submission (Submission Point FC76.4211.1) and by Council Staff. On this basis, it is recommended that there is no amendment to Area Map 76/1 and that submission point 76.0-3 is rejected.

Submission Point 76.0-4 (Jean Gorman) seeks the inclusion of the Hawthorn Hedge as an indicative reserve due to the habitat values it presents to a range of bird species. The Hawthorn Hedge adjoins the proposed Oak Tree Reserve (identified on Area Map 76/1 - Figure 1). The Hawthorn Hedge is depicted below in Figure 4.

- **Further Submission Point FC76.4211.2** (Wakefield Village Development Ltd) suggests that the Hawthorn Hedge is not considered worthy of protection.

Figure 4: Hawthorn Hedge adjoining the proposed Oak Tree Reserve.



The Hawthorn hedge identified in Figure 4 is not identified as protected in the TRMP.

Hawthorn is not identified in the Nelson Tasman Regional Pest Management Strategy, however Mitch Seek, Council's Biosecurity Officer states that *'Hawthorn produces many long-lived seeds that can be spread by birds, water or soil movement and out-competes most other species by forming dense thickets, preventing the establishment of native seedlings and forest regeneration'*¹. Mr Seek has concerns about the potential adverse impacts Hawthorn may have on established native vegetation adjoining the site and within Faulkner Bush.

Additionally, the Council's Contract Reserve Planner, Rosalind Squire would not support retaining a Hawthorn hedge which is considered an exotic pest species². In light of the above comments, submission point 76.0-4 is recommended to be rejected.

Submission Point 76.0-5 (Jean Gorman) seeks development to be limited within the area identified in Figure 5 due to flooding from Jenkins Creek, Pitfure and Gossey Streams during high rainfall events. The submitter (3653) seeks that development within this area be restricted to the road frontage with Edward Street.

- **Further Submission Point FC76.4211.3** (Wakefield Village Development Ltd) states that the Nelson Tasman Land Development Manual provides appropriate framework for managing flood hazard.

In order to further understand the effects of flooding from Jenkins Creek, Pitfure and Gossey Streams the flood model boundary was extended from the existing 2020 model (which was used for the notified s32 Evaluation Report) to include the entire upper catchments of the Pitfure Stream, Jenkins Creek and Gossey Stream. The extended model has enabled the flood risks within the Wakefield Development Area to be better represented, and in particular the area between Edward Street, Gossey Stream and Jenkins Creek, which were previously upstream of the model extent.

¹ Tasman District Council Biodiversity Officer – Mitch Seek Email 11 April 2023

² Contract Reserve Planner - Rosalind Squire Email 16 November 2022

The updated flood modelling indicates that the area between Edward Street, Jenkins Creek and Gossey Creek could get inundated in a future 1% AEP flood event with flood depths varying between 0.05 m and 1 m as shown in Figure 6.

‘The updated model indicates that the flood extent throughout the Wakefield Development Area is similar to the results from the 2020 model even though modelled flows from the upper Pitfure, Jenkins and Gossey Catchments are significantly higher than previously modelled. The flood extent does not change as result of higher flows due to how the river is confined within the higher terraces. Higher flows do result in higher flood depths and flood risk throughout the flood plain’ (Wouter Woortman, May 2024; Appendix 5).

A 20 metre esplanade reserve is recommended either side of Gossey Stream and Jenkins Creek where it extends within the development area. This reserve is illustrated in amended Area Map 76/1 (Appendix 4) and Figure 6 below. Within the area between Edward Street, Jenkins Creek and Gossey Stream the esplanade reserve partially accommodates some of the area expected to be inundated in a future 1% AEP flood event.

It should be noted that the reserve area is indicative only and a greater width may be required for flood mitigation and stormwater purposes. All open channels will need to be designed in accordance with the NTLDM and include specifications around future flood flows, freeboard, ecological enhancements, maintenance access etc³.

In addition, the land between Edward Street, Gossey Stream and Jenkins Creek is currently zoned Rural 2 and is proposed to change to deferred Residential. Deferment lifting is subject to the land being serviced appropriately with the required infrastructure ensuring that the site cannot be developed until appropriate stormwater servicing is in place.

The TRMP includes policies and matters of control/restricted discretion (6.17.3.2A, 16.3.3.3 (19A), and 16.3.3.3 (19B)) to ensure that flood risk from all waterways is managed appropriately at the time of development including the extent to which mandatory and good practice matters of Chapter 5 of the NTLDM have been achieved. The combination of the TRMP and NTLDM requirements will ensure that flood risks, both onsite and off-site are addressed at the resource consent stage.

It is recommended that an amendment is made to Policy 19.2.2.7 (f)(ii) to enable further information to be requested as part of a subdivision application on how flood hazard risk from Pitfure Stream, *as well as Gossey Stream and Jenkins Creek* is managed. Refer to Appendix 1 for the recommended TRMP text amendments.

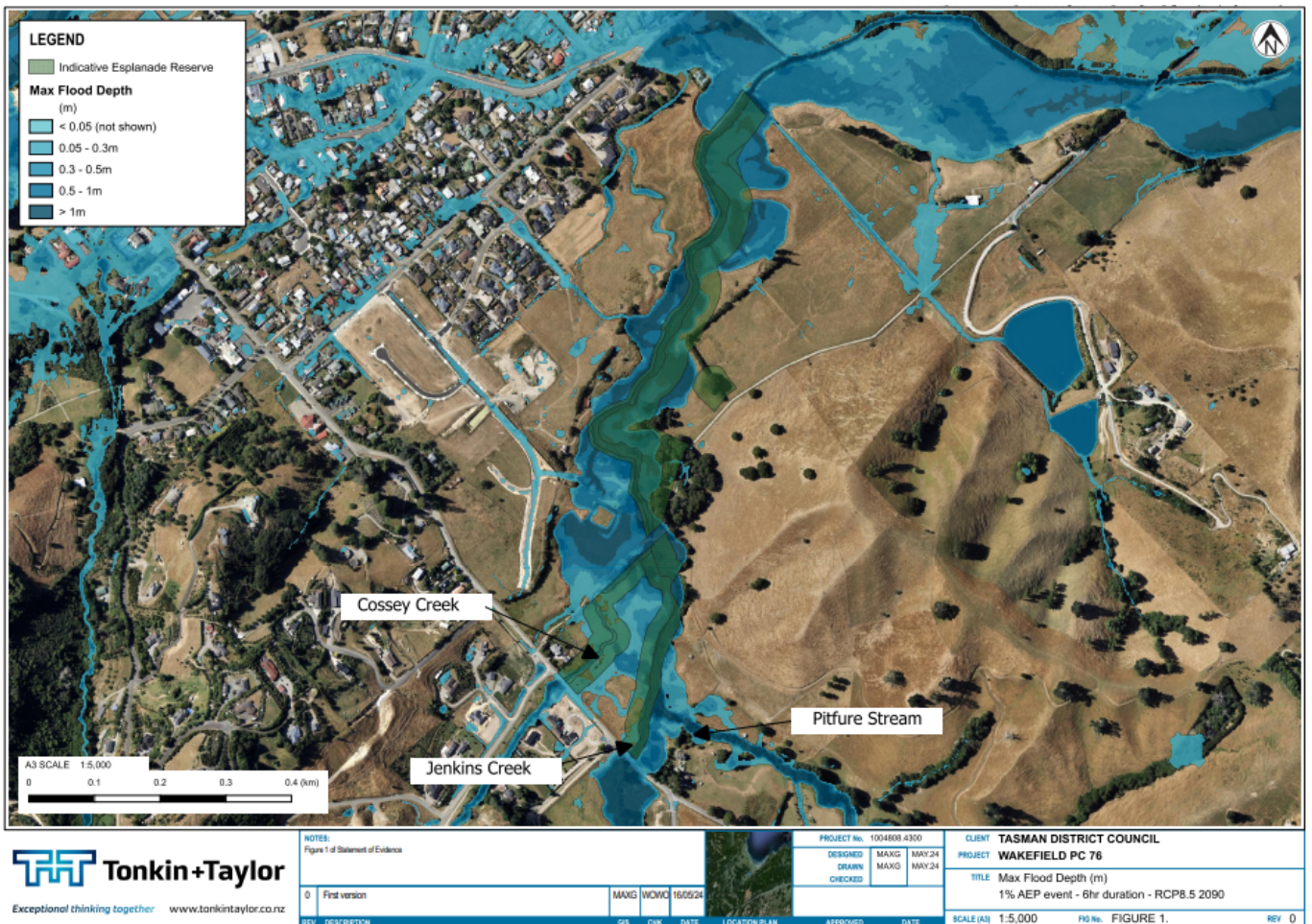
On the basis of the above points, Submission Point 76.0-5 is recommended to be accepted with the recommended inclusion of an indicative reserve along Gossey Stream with amendments to Area Map 76/1 and provision 19.2.2.7(f) (ii).

³ Appendix 5 – Supporting Evidence Wouter Woortman May 2024

Figure 5: Waterways and recommended indicative reserves within the Edward Street area (extract from recommended update Area Map 76/1 – Appendix 4).



Figure 6: 2024 Flood Modelling (1% AEP Event) with the recommended indicative reserve overlaid (Extract from Appendix 5)



Submission Point 76.0-6 (Homes for Wakefield) references the consultation process undertaken as part of PC76. The submission considers that sufficient time was not allowed for public involvement and that additional public meetings should have been held. In particular, the submitter considers that there was not sufficient time to consider the proposal prior to the Wakefield Community Council meeting held in September 2022.

As detailed in Section 1.5 of this report, consultation on PC76 included two main phases pre-notification consultation (including the circulation of plan change draft material), and Schedule 1 consultation.

Two rounds of pre-notification public consultation were undertaken for PC76. The first round included letters to landowners, phone calls and emails with interested person(s), and an in-person presentation at a Wakefield Community Council meeting in November 2021.

The second round was undertaken in March-April 2022, in conjunction with public consultation on the Future Development Strategy 2022. This round was unfortunately restricted by COVID-19 precautions but included an online feedback form, letters to landowners and adjoining property owners, a virtual presentation at the Wakefield Community Council meeting with the wider public invited, a video call meeting with Homes for Wakefield and various emails and phone calls with interested people.

During the Schedule 1 consultation phase, as well as advertising the notification of the plan change via Council's standard communication channels, Council staff attended the Wakefield Community Council Meeting on 19 September 2022. A request to attend this meeting was made to the Wakefield Community Council on 18 August 2022. It is understood that the submitter, Homes for Wakefield, are a sub-group of the Wakefield Community Council.

Significant effort was made to communicate the plan change to the community during the pre-notification and Schedule 1 notification phases with dedicated websites included on the Tasman District Council website for both phases of engagement in addition to the various engagement methods described above. All consultation and notification requirements of Schedule 1 of the RMA have been met through this process.

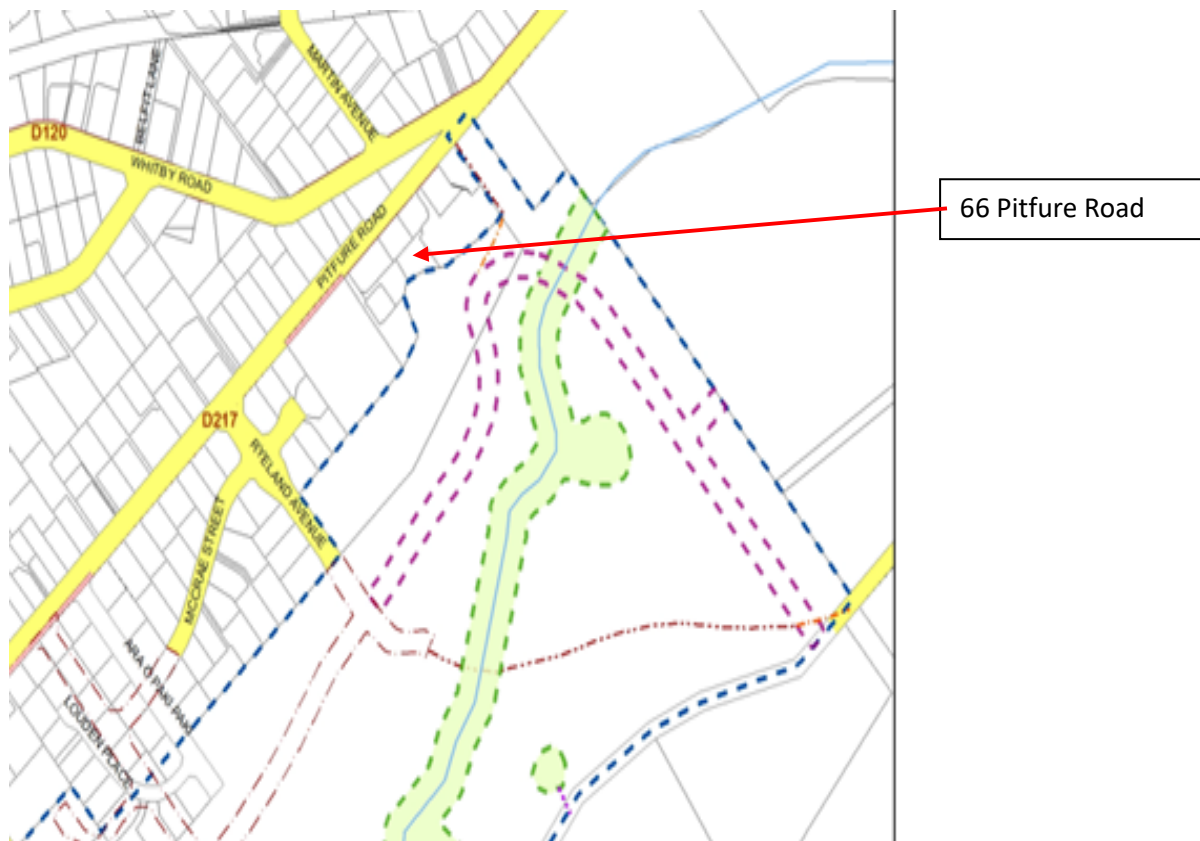
No change in this process is recommended and it is recommended that this submission point is rejected.

Submission Point 76.0-7: (D 7 K McKay) The submitter (4210) objects to the distance of the indicative road from the boundary to their property at 66 Pitfure Road on the basis of a loss of privacy and traffic noise. In addition, the submission point identifies a possible stream that runs behind their property and questions whether this will be infilled as part of the development works.

Further Submission FC76.4211.8 (Wakefield Village Development Ltd) opposes the Submission Point 76.0-7 on the basis that the stream is a swale which only holds water during high rainfall events and the land is already zoned residential.

PC76 includes an extension to the indicative road as shown in Figure 7. This indicative road is proposed to be extended to provide internal road connections within the area and a connecting walkway to Pitfure Road.

Figure 7: Proposed PC76 TRMP Indicative Items and location of 66 Pitfure Road (extract from update Area Map 76/1).



Indicative roads are primarily in place to ensure an internal and external transport connection is able to be achieved during subdivision and development. It signals this on the planning maps and typically becomes a matter discussed by Council and the developer during subdivision consenting. The primary outcome desired is that a connection is achieved from 'point A' to 'point B'. The TRMP contains provisions to support indicative roads to provide safe and efficient routes within undeveloped residential locations. The location of the roads are 'indicative' which means there is some flexibility in the final location. The final location is determined at the subdivision stage of a resource consent application.

The TRMP includes assessment criteria (Section 16.3A (44) at the subdivision stage that contains a requirement to consider the effect of roads on waterways, ecosystems, and the amenities of adjoining properties. The TRMP subdivision assessment criteria (Section 16.3A (2) also requires an assessment of the potential effects of the subdivision on the amenity values and natural and physical character of the area. Any potential adverse effects on waterways and the amenities of the adjoining properties will be assessed during the subdivision stage and provisions included (where necessary) such as setback distances and landscaping.

Submission Point 76.0-7 seeks amendments to the indicative roading network which would adjust the indicative road so that it is located further away from the submitter's property and other existing residential properties on Pitfure Road. As discussed above, the location of the indicative road is 'indicative' only and will be finalised at the subdivision stage following a TRMP assessment which will consider amenity values. Amendments to Area Map 76/1 are proposed to align with the landowners masterplan and will result in the indicative road network moving closer to Pitfure Stream and further away from the submitters property – refer Appendix 4. This change is considered to address the submitters concerns.

The submission point also seeks consideration of a possible stream identified in Figure 8 below. Council has no records of the stream which is indicated by the submitter as being spring fed. Visits to the site indicate that the stream flows intermittently. The landowner has defined the stream as a swale which is a low-lying

depressed area of land that used to drain. The stream/ swale follows the boundary of several residential properties and has not been identified as a flood risk. An indicative reserve imposing a setback is not considered appropriate in this situation as the stream/swale is not greater than 3 metres, does not pose a flood risk or create a natural connection pathway. Any impact to this stream/swale will be assessed at the subdivision stage with appropriate provisions such as setbacks or drainage controls imposed if considered necessary.

Figure 8: *Unnamed stream or swale adjoining the rear of residentially properties on Pitfure Road.*



The indicative road is recommended to be relocated as part of submission point 76.0-8 below which will partially address the concerns expressed in this submission point. The point around the stream (76.0-7) is recommended to be rejected.

Submission Point 76.0-8 (Wakefield Village Development Ltd) seeks mapping amendments to align with the landowner's conceptual masterplan and its alignment of indicative walkways, roads, and reserves.

- Amend alignment of indicative walkways

The submitter seeks an amendment to the indicative walkways identified on Area Map 76/1 (Figure 9) to align walkways with the landowners masterplan (Figure 10) which includes a walkway crossing the reserve (and Pitfure Stream) from Ryeland Avenue and extending along the eastern side of the indicative reserve.

Figure 9: Walkway connection relevant to submission point highlighted (red) (extract from update Area Map 76/1).

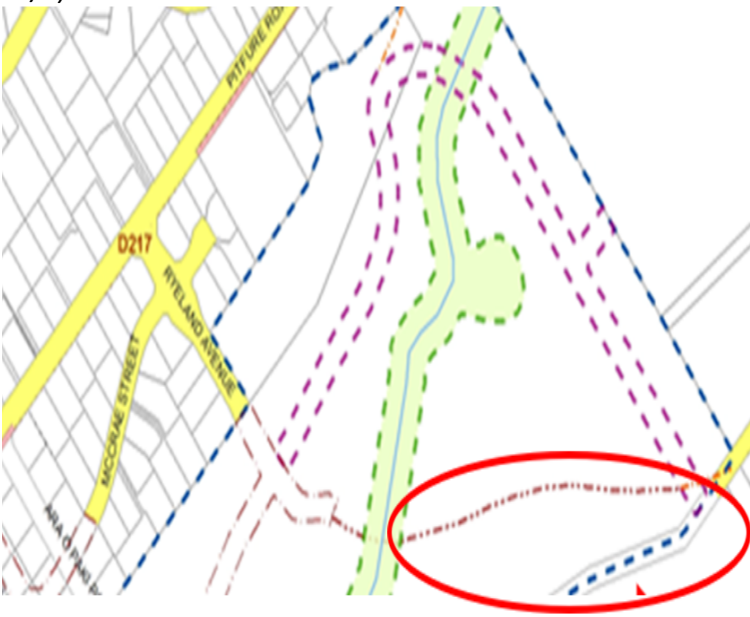
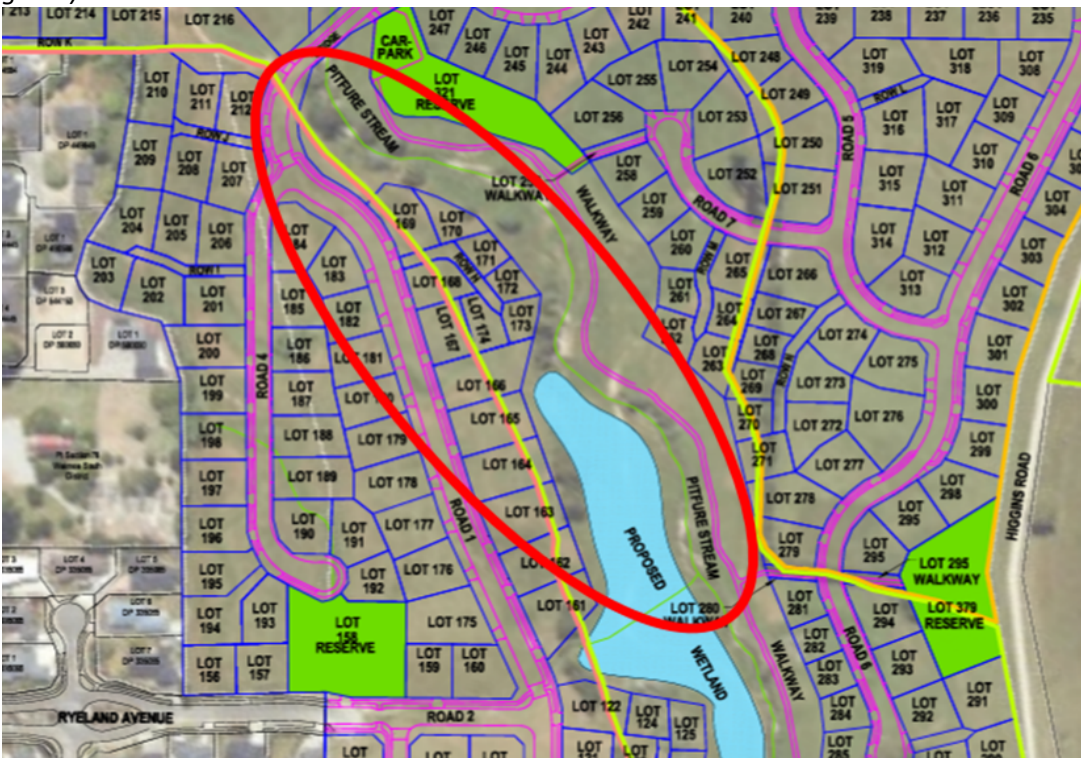


Figure 10: Extract from Wakefield Village Development Ltd Masterplan including walkway connections (light green).



The intention of the indicative walkway is to provide an active transport connection from the western side of the plan change area to Higgins Road and the Tasman Great Taste Trail. Amending the walkway to align with the landowner’s masterplan which includes a walkway within the indicative reserve adjoining Pitfure Stream and also a connection to the proposed reserve around the mature oak tree is supported by the Council’s Reserves Team (Appendix 6) and it is therefore recommended that this submission point is accepted and Area Map 76/1 amended to reflect this change.

- Amend alignment of indicative road

The submitter seeks an amendment to the indicative road network identified on Area Map 76/1. Indicative roads are primarily in place to ensure an internal and external transport connection is able to be achieved during subdivision and development. The plans provided by the submitter (Wakefield Village Development Ltd) and included in Figure 12 show a road network extending from Ara o Paki Paki (rather than Loudon Place) through to Edward Street which is now built as part of an approved resource consent application.

The amendments also include an adjustment to the location of the main internal connector from Ara o Paki Paki to Ryeland Avenue and onto Higgins Road, aligning it closer to the Pitfure Stream and further away from the existing residential properties. The connection to the land to the northeast is not shown in the submitters plan however minor side roads are included in the amendments sought.

The submitter seeks amendments to the key roads and the inclusion of minor roads on Area Map 76/1. The amendments to the key roads are slightly different but broadly consistent with the original intent of the indicative roads shown on Area Map 76/1. This minor change to the key roads is supported by Councils Transport Planner and documented in Appendix 7 – Supporting Evidence Transport.

The linkage to the north west and the adjoining parcel of land is requested to be removed as part of the submission. This linkage will enable connectivity between the plan change area and SH6 through the land (320 Higgins Road) to the north west which is identified for residential development in the Nelson Tasman Future Development Strategy 2022-2052 as shown in Figure 11. It will also provide a connection from the future residential area through the Wakefield Development Area to the town centre and school. Councils Transport Planner supports retaining this connection – refer to Appendix 7.

The submitter also requests the inclusion of minor side roads (cul-de-sacs) within Area Map 76/1. Indicative roading is included to ensure internal and external transport connection are able to be achieved. Inclusion of minor internal roads where there are no through roads or exit roads and no connection is not considered appropriate as they do not provide a connection which is the main purpose of an indicative roading network. It is recommended to reject the inclusion of internal minor roads within Area Map 76/1.

Figure 11 Exact of Future Development Strategy 2022-2052 site at 320 Higgins Road (yellow).



- Amend alignment of indicative reserves

Wakefield Village Development Ltd have requested the removal of areas of the indicative reserve along the Pitfure Stream and an adjustment to the indicative reserves shown on Area Map 76/1 to align with their concept masterplan as identified in Figure 12. The purpose of the indicative reserve along Pitfure Stream is to provide access for public amenity, recreation and stream maintenance and to partially accommodate flood flows (noting that the landowner may need to provide additional land for accommodating flood flows).

Wakefield Village Development Ltd have requested the following amendments to indicative Area Map 76/1;

- A reduction in the indicative reserve notation (Area Map 76/1) on the true left bank of the Jenkins Creek and Pitfure Streams for its (almost) entire length as depicted in Figure 12.

The Council's Contract Reserve Planner has recommended that the indicative reserve notation on the true left bank of Jenkins Creek and Pitfure Stream from the Edward Road boundary to Higgins Road Reserve is retained to 20 metres from the top of each bank, where it is within the Wakefield Development Area. Refer to Appendix 6 – Supporting Evidence, Reserves. The waterways are greater than 3 metres at their annual fullest flow and therefore recognition through including an indicative reserve along their length is appropriate and supported through provisions in the TRMP.

A reduction in the indicative reserve notation on the true left bank of the Pitfure Stream from Higgins Road to the northern boundary of the Wakefield Development Area is supported to provide for a 6 metre wide level area of land from the top of the bank as shown in Appendix 4. The reason for this is to enable the efficient use of the residential land while providing a corridor for maintenance vehicle, public access, planting and erosion control.

- An amended reserve design adjoining the Oak tree and Higgins Road – Referred to as Oak Tree Reserve.

The Council's Contract Reserve Planner supports an amendment to the shape of Oak Tree Reserve provided the reserve is extended to 10 metres from the drip line of the tree. I note that exact dimensions and placement of any indicative items will be determined within the subdivision consent process. Refer to Appendix 4 for amended Area Map 76/1.

- iii) Amendments to the true right bank of the Pitfure Stream and Jenkins Creek;

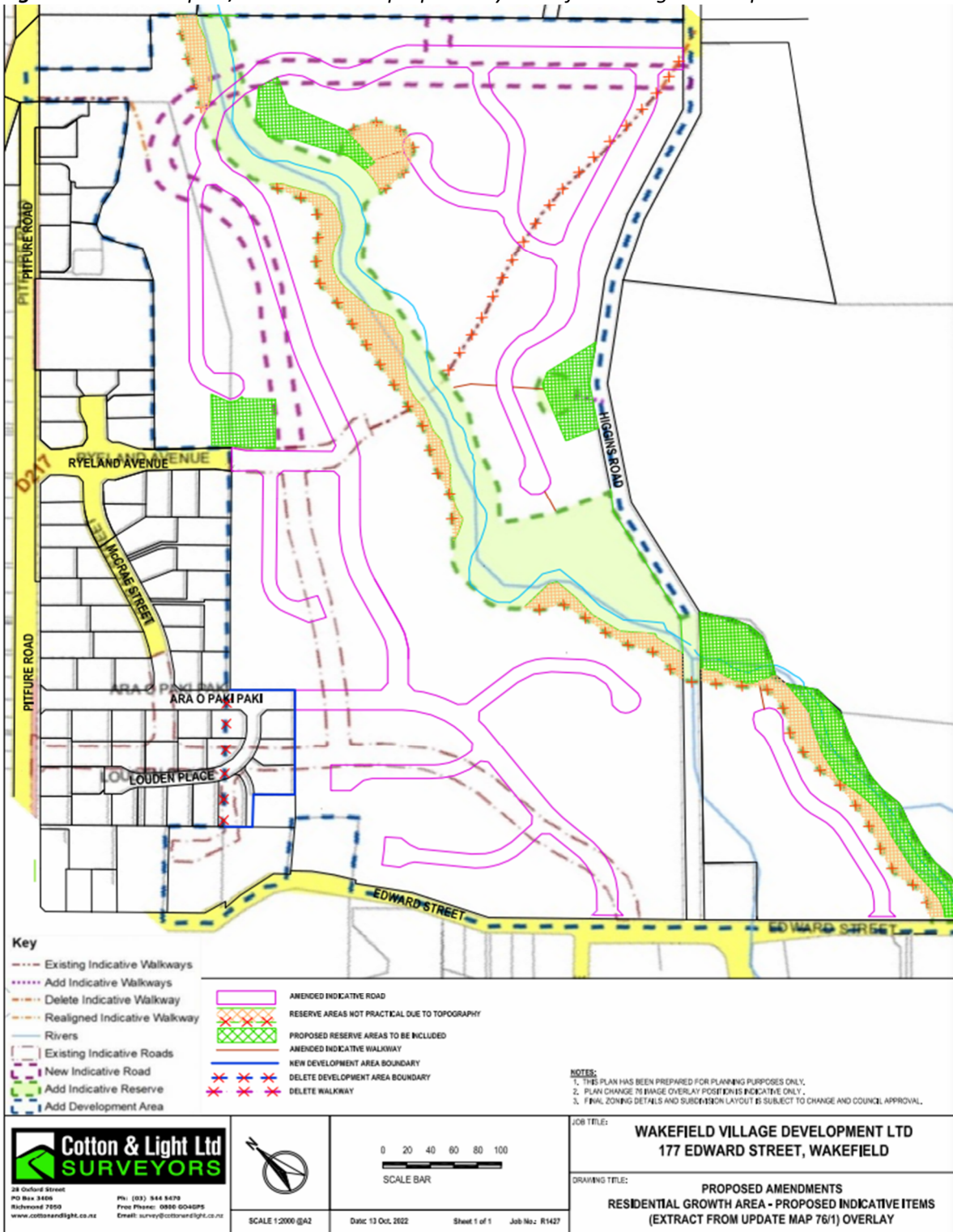
The Council's Contract Reserve Planner supports amending the reserve beside Pitfure Stream at the northern end of the development area to provide a more favourable connection for recreational and environmental uses and recognise the flood risk as shown on Appendix 4 and described in detail in Appendix 6. This amendment includes increasing the 20 metre width by 14 metres to make a total width of 34 metres to reflect the reduction in the reserve to 6 metres on the true left bank.

An additional rule is also recommended to the TRMP Schedule 16.3.3.1 9n) (iii)(c) and 16.3.3.1B (f) (viii) to specify that no credit against the reserve financial contributions will be provided for the additional (up to 14 metres) Local Purpose (Esplanade) Reserve width (above 20 metres) on the right bank of the Pitfure Stream, required in lieu of the reduction in the width of the Local Purpose (Esplanade) Reserve on the left bank. The reason for this additional rule is to ensure that Council is not providing additional reserve financial contribution credits for land that could be vested without a credit on the left bank;

- iv) A new indicative neighbourhood park reserve adjoining Ryeland Avenue;

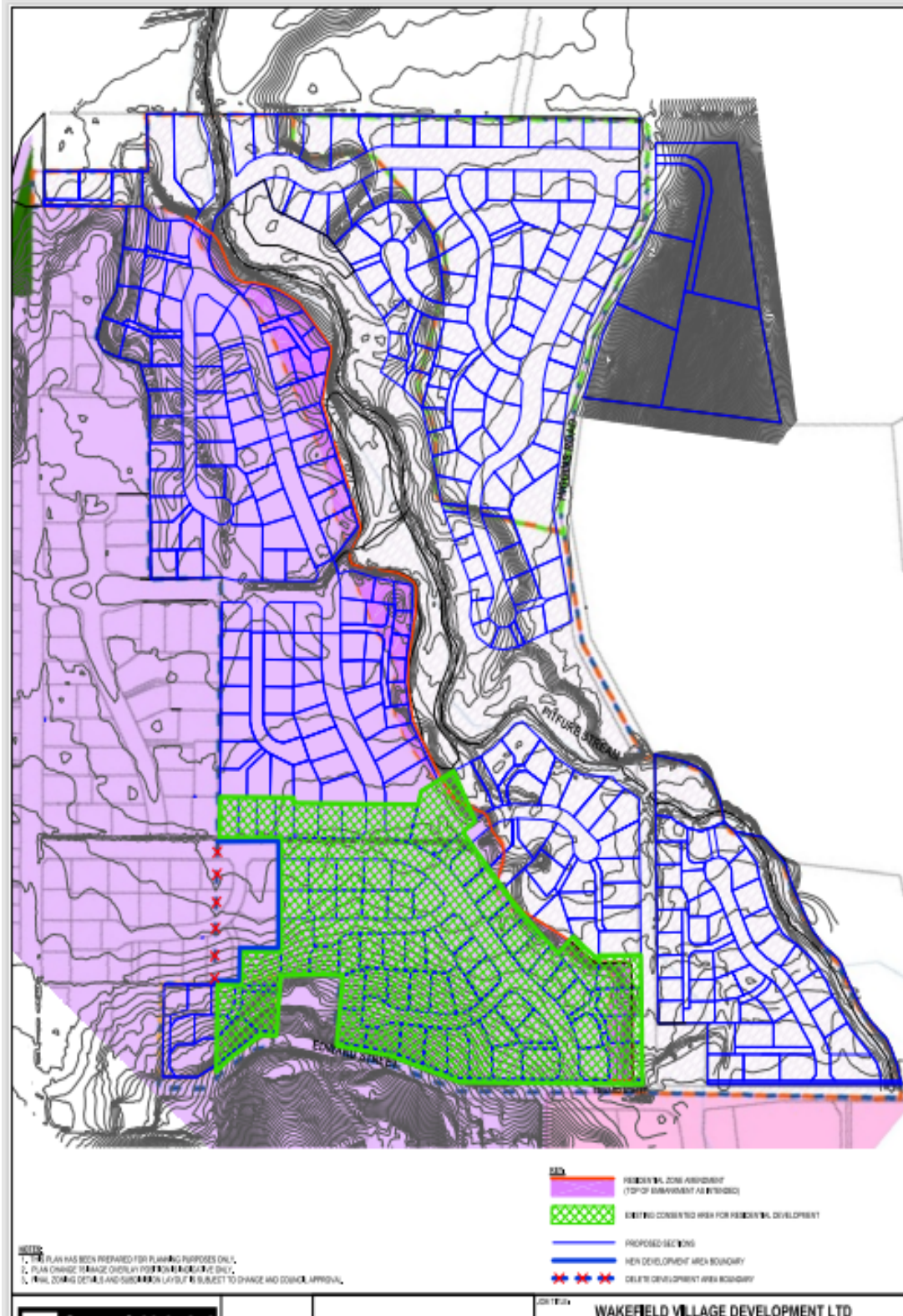
The addition of a neighbourhood park adjoining Ryeland Avenue is not supported by council however the inclusion of an indicative walkway to improve walking/cycling connections in this location is supported. The Council's Contract Reserves Planner has indicated that it is exceeding its level of service for reserves with the vesting of large areas of reserve adjoining the waterways and the Oak and Totara reserve areas (noting the Totara reserve area refers to the widened area near Higgins Road and Pitfure Stream where there are existing Totara trees).

Figure 12: Area Map 76/1 amendments proposed by Wakefield Village Development Ltd.



Submission Point 76.0-9 (Wakefield Village Development Ltd) seeks an amendment to the current Residential Zone boundary to follow the existing upper terrace (western side) of the Pitfur Stream as shown on in Figure 12.

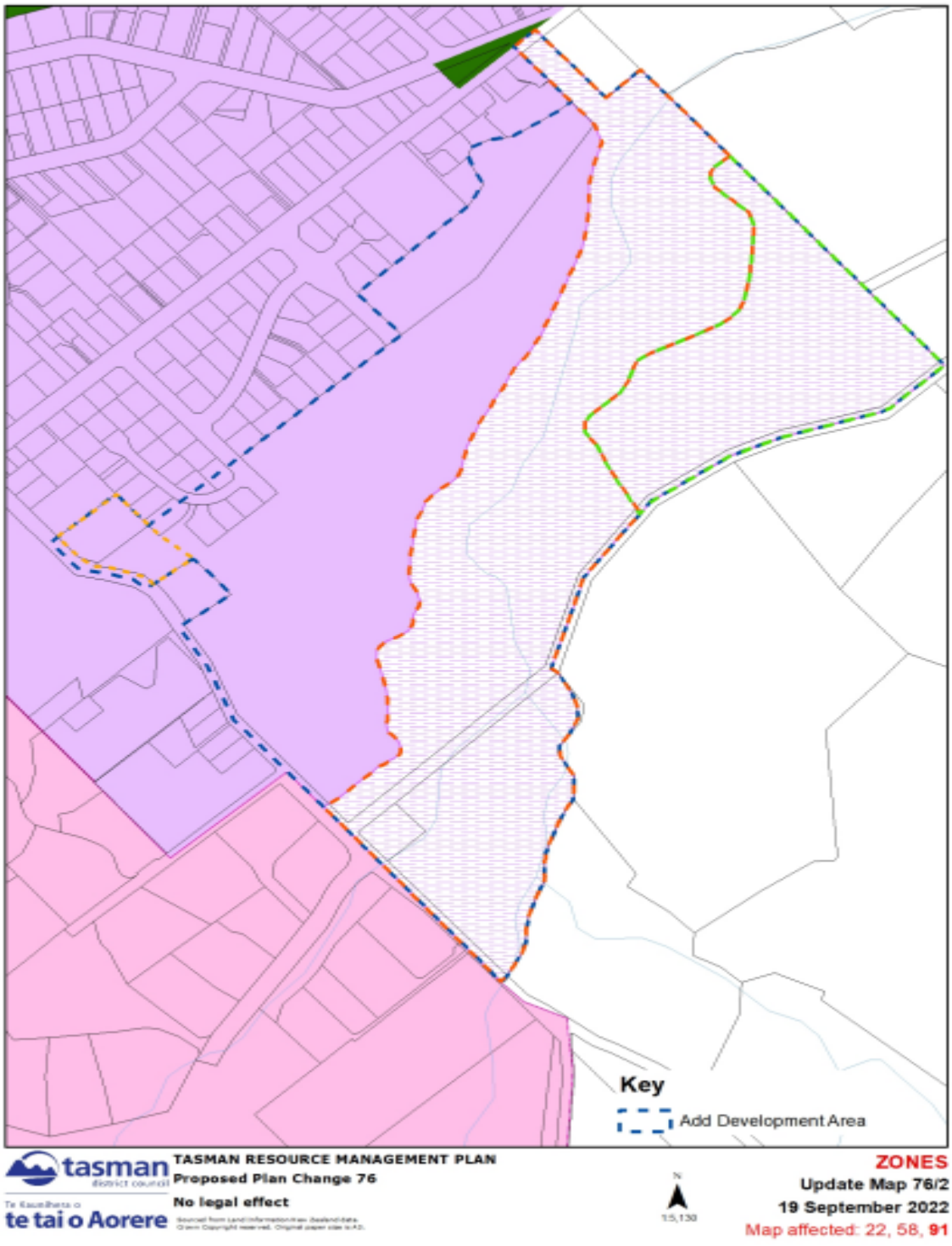
Figure 12: Zone Map 76/2 amendments proposed by Wakefield Village Development Ltd (dark pink shading).



Wakefield Village Development Ltd (submission point 76.0-9) has requested that the current Rural 2 zoning within the area identified on the Figure 12 legend as Residential Zone Amendment (dark purple) be rezoned

to residential. It is currently Rural 2 and proposed to be 'Rural 2 deferred Residential' under the notified PC76 (Figure 13).

Figure 13: Proposed PC76 Zoning Update Zone Map 76/2.



In the northern part of the development area it is a logical to amend the zoning to align with the topography of the site and prevent the spilt zoning of land particularly where the area of additional land is minimal. It should be noted that there is currently no wastewater servicing capacity for development on the residentially zoned land (or the supported extension to the residential zoning). Wastewater servicing is however included in the Councils 10 Year Plan.

In addition, the Councils Reserves Team have requested a 6m wide esplanade reserve in this area to allow for maintenance, plantings etc (refer Appendix 6). As such it is recommended that this submission point be accepted.

Submission Point 76.0-9 also seeks amendment to the boundary of the Wakefield Development Area to exclude the current residentially zoned land as shown on the attached plan in Appendix 4.

The amendment to the Wakefield Development Area boundary is supported in part. The portion accepted is to realign the Development Area boundary around numbers 3 and 5 Louden Place, 14 Ara o Paki Paki as these are now individual titles as part of a previous subdivision. We understand the submitter now wishes to retain the remainder of the area subject to this submission point within the proposed Wakefield Development Area. This is the area of existing residential zoning subject to consent application RM210681 and RM150714V1 (Stages 1, 2, 4C). It is recommended that this aspect of the submission point be accepted in part.

Submission Point 76.0-10 (Wakefield Village Development Ltd) seeks to amend and update Map 76/3 – The Fire Sensitive Area in accordance with amending the Wakefield Development Area Boundary and the zoning as requested in Submission Point 76.0-9. This submission point is recommended to be accepted.

2.2.2.2 Recommendations

Submitter Name No. and Point	Recommendation	Reason
Jean Gorman 3653 - 76.0-1	Accept	In support
Jean Gorman 3653 - 76.0-2	Accept and amend Area Map 76/1	Amend Area Map 76/1 to include an indicative reserve along Gossey Stream.
Jean Gorman 3653 - 76.0-3	Reject	Totara tree has already been removed and was not identified as notable under the TRMP.
Wakefield Village Development Ltd FC76.4211.1	Accept	
Jean Gorman 3653 - 76.0-4	Reject	Hawthorn hedge is considered an exotic pest species and is not desirable to protect.
Wakefield Village Development Ltd FC76.4211.2	Accept	
Jean Gorman 3653 - 76.0-5	Accept and amend Area Map 76/1 and 19.2.2.7(f)(ii)	PC76 recognises the flood hazard associated with waterways within the subject site through the provision of

Wakefield Village Development Ltd FC76.4211.3	Accept	indicative reserves and proposed TRMP provisions. Grossey and Jenkins Creeks have been included in flood hazard risk wording related to 19.2.2.7(f)(ii) and an esplanade included for Grossey Stream in Area Map 76/1.
Homes for Wakefield 4209 - 76.0-6	Reject	Consultation and notification requirements of Schedule 1 of RMA were met during PC76 process.
D & K McKay 4210 - 76.0-7	Accept in part (indicative road). Reject (watercourse)	Amenity and environmental effects will be assessed at resource consent stage.
Wakefield Village Development Ltd FC76.4211.8	Accept	
Wakefield Village Development Ltd 4211 - 76.0-8	Accept in part with amendments to Area Map 76/1	Amend Area Map 76/1 and as per supporting evidence provided in Appendix 6. Retain road connection to the north east.
Wakefield Village Development Ltd 4211 - 76.0-9, 4211- 76.0-10	Accept in part (76.0-9) Accept (76.0-10)	Accept in part the amendment of the Wakefield Development Area to exclude the area that has already been consented and accept an amendment to the residential zoning to align with the top of the bank. Accept the associated amendments to the Fire Sensitive Area.

2.3 Topic 76.2: Meaning of Words (Definitions)

2.3.1 Submission Requests

This topic discusses and considers TRMP Chapter 2 - Meaning of Words (Definitions). Note submission point 76.2-2 (4209) has been moved and is covered under Topic 76.5.

2.3.1.1 Submitter 4206: Waka Kotahi

- **Submission Point 76.2-1 – Support:** Support the definition of Wakefield Development Area as it clearly defines the area.

2.3.1.2 Submitter 4211: Wakefield Village Development Ltd

- **Submission Point 76.2-3 – Support:** Support the proposed change to the definition of “Compact density development” to include “Wakefield” is supported.
- **Submission Point 76.2-4 – Support:** Propose change to the definition of “Urban Design Guide (Part II, Appendix 2)” to include “Wakefield” is supported. Retain as proposed.
- **Submission Point 76.2-5 – Support:** Support the inclusion of a definition of “Wakefield Development Area” is supported. Retain as proposed.

2.3.2 Reporting Officer Assessment and Recommendations

2.3.2.1 Discussion and Reasons

The submitters are all in support of the changes proposed to Chapter 2 - Meaning of Words. It is therefore recommended that all of these submissions be accepted.

2.3.2.2 Recommendations

Submitter Name No. and Point	Recommendation	Reason
Waka Kotahi 4206 - 76.2-1	Accept	In support
Wakefield Village Development Ltd 4211 - 76.0-3, 4211 - 76.0-4, 4211 - 76.0-5	Accept	In support

2.4 Topic 76.5: Site Amenity Effects

2.4.1 Submission Requests

This topic discusses Site Amenity Effects under Chapter 5 of the TRMP.

2.4.1.1 Submitter 4206: Waka Kotahi

- **Submission Point 76.5-1 – Support:** Support the addition of enabling medium density development in specified Development Areas, reflects the need to use land more efficiently where expansion does occur as it aligns with the Nelson Tasman FDS.

2.4.1.2 Submitter 4209: Homes for Wakefield

- **Submission Point 76.2-2 – Support in Part:** Support the smaller section size but would prefer the building platform to reduce to a minimum of 80m².

Submitter's Reason: Prefer smaller sections are 'pepper potted' around the development not in one single area.

2.4.1.3 Submitter 4211: Wakefield Village Development Ltd

- **Submission Point 76.5-3 – Support in Part:** Propose change to the 'Principal Reasons and Explanations' in 5.3.30.

Submitter's Reason: The 'Principal Reasons and Explanations' in 5.3.30 do not entirely reflect that the rules go beyond enabling medium density development and includes a requirement to include 20% of high density and 20% medium density allotments.

2.4.2 Reporting Officer Assessment and Recommendations

2.4.2.1 Discussion and Reasons

Submission Point 76.5-1 is in support and is recommended to be accepted.

Submission Point 76.2-2 supports the smaller section size but would prefer the building platform be reduced to a minimum of 80m². The plan change provisions are based on lot sizes not building platforms. PC76 requires a mixture of lot sizes to provide for a range of housing densities including smaller lots which could support small building platforms. In addition, amended provisions are proposed to enable a second dwelling on a lot greater than 600m² to support the development of smaller houses and a range of lots sizes– Refer Appendix 1. The provisions achieve the intent of this submission point by providing for smaller houses to be developed without enforcing a building platform size. It is recommended that this submission point be rejected.

Submission Point 76.5-3 requests an amendment to provision 5.3.30 - Principal Reasons and Explanations - to reflect the requirement to include 20% of high density and 20% medium density allotments. The TRMP refers to 'medium density' in Chapter 2 Meanings of Words as being sites typically averaging 200 – 300m².

The explanation provided in 5.3.30 includes the wording '*Enabling medium density development in specified Development Areas reflects the need to use land more efficiently where expansion does occur*'. This wording reflects the intent of PC76 which is to provide additional land for residential housing and encourage intensification within the proposed Wakefield Development Area. As the submitter noted it does not directly reference the variety of sections sizes also proposed to be required through PC76.

It is recommended that an amendment to the wording of 5.3.30 be included as follows; *'Enabling medium density development and requiring a variety of section sizes in specified Development Areas reflects the need to use land more efficiently where expansion does occur'*.

The Tasman District Council Intensification Action Plan 2020 stipulates that *'the definition of medium density housing is variable within the industry, Tasman District Council is enabling medium density housing not high density that you would find in cities like Auckland or Wellington'*. The explanation provided within provision 5.3.30 reflects the intent for PC76 to provide medium density housing in Tasman which aligns with the Tasman District Council's Intensification Action Plan 2020 and as such the use of the words 'high density' have not been included in the recommended amendment.

The submission point highlighted this inconsistency, but the relief sought was to retain the change as proposed. Therefore, it is recommended that this submission point be rejected with a subsequent amendment made for clarity. Refer to Appendix 1 for the full schedule of recommended amendments.

2.4.2.2 Recommendation

Submitter Name No. and Point	Recommendation	Reason
Waka Kotahi 4206 - 76.5-1	Accept	In support
Homes for Wakefield 4209 - 76.2-2	Reject	PC76 achieves the intent of this submission point through the provisions relating to lot size without specifying building platform sizing.
Wakefield Village Development Ltd 4211 - 76.5-3	Reject and amend 5.3.30	Amend 5.3.30 to include a requirement for a variety of lot sizes.

2.5 Topic 76.6: Urban Environment Effects

2.5.1 Submission Requests

This topic discusses submission points in reference to Chapter 6 – Urban Environment Effects. Several of the submission points are in support of aspects of Topic 76.6. These submission points are identified in the section below and are recommended to be accepted and are not discussed further.

2.5.1.1 Submitter 4207: Neil Kitchen

- **Submission Point 76.6-1 - Support in part:** No evidence of consultation with Waka Kotahi NZ Transport Agency.

Submitter Reason: Concern with regards to the additional traffic generation and impact to Pitfure Road and its junction with Whitby Road. Concern also for extra volume exiting Martin Avenue and a ‘pinch point’ at this junction. Noted immediate and secondary school bus route and children walk to Wakefield School along Pitfure Road.

- **Submission Point 76.6-2 - Support in part:** Seeks the removal of the indicative road exit to Edward Street.

Submitter Reason: Concern with regards to additional traffic generation on Pitfure Road caused by the exit to Edward Street causing a rat run from Gossey Drive and beyond. Concerns for cyclist safety as they cross the Great Taste Trail on Edward Street.

- **Submission Point 76.6-3 - Support in part:** Consideration should be given to upgrading Higgins Road and including a roundabout on State Highway 6 (SH6) and Bird Lane.

Submitter Reason: Safety concerns with additional traffic generation.

- **Submission Point 76.6-4 - Support in part:** Suggest the land at the end of the development area leading to Pitfure Road could be a road exit with provision of a roundabout junction at Pitfure Road and Whitby Road to assist with congestion and traffic flow.

Submitter Reason: Safety concerns with additional traffic generation.

- **Further Submission FC76.3653.1 – Jean Gorman - Support:**

- Further Submission FC76.3653.1 – Support: Supports the submission points around concerns for road safety and the need for a round-about at Whitby Road and Pitfure Road. The submission also includes concerns around the safety of Pitfure Road for cyclists and the need for a separate cycleway and the use of internal road network of the proposed indicative road network as a ‘rat race’ for heavy traffic use. This submission also raises the question around lighting and the effect on sleep patterns. Requesting that all lighting is downward facing.

- **Further Submission FC76.4211.4 – Wakefield Village Development - Opposed:**

- Further Submission FC76.4211.4 – Oppose: Opposes the road exit to Pitfure Road and upgrade to Higgins Road. Noting that the new road intersection is already consented to Edward Street.

2.5.1.2 **Submitter 4206: Waka Kotahi**

- **Submission Point 76.6-5 – Support:** Supports the inclusion of Policy 6.1.3.1B to align with the urban design guide as it specifies good design requirements for liveable communities.
- **Submission Point 76.6-6 – Support:** Supports the wording for enabling smaller residential lot sizes in Wakefield as it is in line with the Nelson Tasman FDS and growth near the town centre.
- **Submission Point 76.6-7 – Support:** Supports the inclusion of Wakefield in Policy 6.2.3.2A to encourage medium density development in this area.
- **Submission Point 76.6-8 – Support in part:** Supports Policy 6.2.3.22B for enabling higher density housing options but the word ‘higher’ could be confused with high density housing. Therefore, Waka Kotahi consider that different wording should be used for clarity, such as a variety of lot sizes and housing typologies’.
- **Submission Point 76.6-9 – Support:** Supports wording in line with the Nelson Tasman FDS purpose as the area should be zoned to the fullest extent possible to provide local services for people who will be living in the walkable catchments. Enabling additional densities in these areas will also support the provision of public transport and active transport infrastructure in the future by concentrating population.
- **Submission Point 76.6-10 – Support:** Support Policy 6.2.20.1(ba). This is in line with the Nelson Tasman FDS. Enabling additional densities in these areas will also support provision of public transport and active transport infrastructure.
- **Submission Point 76.6-11 – Support in part:** Support in part the inclusion of Wakefield. However, Waka Kotahi seeks clarification as to where the ‘cycling’ distance component of ‘walking and cycling distance’ has arisen from. Cycling distances/catchment areas are very different compared to walking.
- **Submission Point 76.6-12 – Support:** Support the inclusion of Figure 6.8A to show the range of housing provided in the Wakefield Development Area.
- **Submission Point 76.6-13 – Support in part:** Support in part the intent but the word ‘higher’ could be confused with high density housing.

Submitter Reason: Waka Kotahi consider different wording should be used for clarity, or higher density is clarified.

- **Submission Point 76.6-14 – Support in part:** Support in part the intent of policies – Amend wording to combine 6.17.3.7A and 6.17.3.7B.

Submitter Reason: Waka Kotahi consider that 6.17.3.7A and 6.17.3.7B should be combined for clarity due to the similarity in wording. Also, Waka Kotahi considers the word ‘higher’ could be confused with high density housing and considers different wording should be used for clarity, or higher density is clarified.

- **Further Submission FC76.4211.5 – Wakefield Village Development – Opposes**
 - Submission Point 76.6-14 is opposed and the changing of the wording from ‘require’ and ‘mandatory’.
- **Submission Point 76.6-15 - Support:** Supports the intent of Policy 6.17.3.12 which promotes efficient use of land.

- **Submission Point 76.6-16 - Support in part:** Supports the intent of the methods, however Waka Kotahi considers the word 'higher' could be confused with high density housing.

Submitter Reason: Waka Kotahi consider different wording should be used for clarity, or the word higher density be clarified.

2.5.1.3 Submitter 4154: Peter Carmody

- **Submission Point 76.6-17 – Oppose:** Pitfure Road: Concern around additional traffic from the development area that would exit Pitfure Road onto SH6 and Whitby Road.

Submitter Reason: Restricted visibility due to angle of traffic entering SH6 from Pitfure Road. Also, additional traffic from the George Fyfe Subdivision. No correspondence from Waka Kotahi.

- **Submission Point 76.6-18 – Oppose:** Edward Street: Concern about extra traffic turning left and right and additional traffic as a result of senior extension to Wakefield School.

Submitter Reason: Concern regarding safety and 'snarl up' at southern end of Pitfure Road.

2.5.1.4 Submitter 4208: Chris and Lesley Olaman

- **Submission Point 76.6-19 – Oppose:** Pitfure Road: Safety concerns due to additional traffic. Multiple sections of the road are one-way due to parking on both sides and currently used by large trucks and trailers. Would like to understand Waka Kotahi's traffic management plans for intersection of Pitfure and SH6.

Submitter Reason: Safety Concerns.

2.5.1.5 Submitter 4209: Homes for Wakefield

- **Submission Point 76.6-20 – Oppose:** Oppose clause 4.1.1.6 where it includes mention of "reverse sensitivity/ cross boundary effects" such as residents complaining of rural activities like agricultural spraying or tractors on roads.

Submitter Reason: Does not believe reverse sensitivity would be an issue because of existing boundaries.

- **Submission Point 76.6-21 – Oppose:** Diversion needed as heavy vehicles (forestry/quarry) use Edward Street and Pitfure Road.

Submitter Reason: Safety

- **Submission Point 76.6-22 – Oppose:** Do not support an emergency exit and would like a permanent access. The emergency access does not mitigate traffic problems for pedestrians and cyclists where traffic generation is increased by the development. A clearer plan is required to address pedestrian and cyclists access to village and safe crossing of Pitfure Road for school children. Additional consideration required for additional cycle and foot traffic which will be created by increased Wakefield School roll when it becomes a full primary school in 2024.

Submitter Reason: Concerns about roading infrastructure, safety, and emergency vehicle access.

- **Further Submission FC76.4211.7 – Wakefield Development Village – Opposes**

- Submission Point 76.6.22 is opposed. The use of the Higgins Road for emergency purposes is supported.
- **Submission Point 76.6-23 – Oppose:** Question the guidelines for modelling flooding and the flood modelling.

Submitter Reason: Concern about flooding and notes requirement of water collection tanks in new developments required by some councils to delay the release of stormwater.

Submitter 4211: Wakefield Village Development Ltd

- **Submission Point 76.6-24 – Support:** Proposed change to Issue 6.1.1 recognises that urban development involves both urban expansion or intensification, or a combination of both. This change is supported as urban expansion can also incorporate a range of housing typologies at different densities. Retain as proposed.
- **Submission Point 76.6-25 – Support:** Proposed change to Policy 6.1.3.1(j) to recognise that cycling is also a part of sustainable urban design. This change is supported as cycling, including electric modes, are now a significant and growing form of alternative transport. Retain as proposed.
- **Submission Point 76.6-26 – Support:** Proposed change to insert “Wakefield” into Policy 6.1.3.1A, with the focus of this policy being on the encouragement of medium density housing in identified areas. This encouragement is supported, including within the planning framework for Wakefield. Retain as proposed.
- **Submission Point 76.6-27 – Support:** Proposed inclusion of new policy that seeks to ensure that higher density housing options in the Wakefield Development Area (WDA) achieve a high standard of amenity through design in accordance with the Urban Design Guide. Retain as proposed.
- **Submission Point 76.6-28 – Support:** Proposed change to Policy 6.2.3.2 is supported.
- **Submission Point 76.6-29 – Support:** Proposed change to Policy 6.2.3.2A is supported.
- **Submission Point 76.6-30 – Support in part:** Amend Policy 6.2.3.2B to “encourage” and “enable” higher density housing options rather than “requiring”.

Submitter’s Reason: The mandatory imposition of lot sizes and higher density housing options is opposed. A variety of housing will occur naturally. It is considered more appropriate to simply provide an enabling planning framework and encourage diversity rather than set strict requirements.

- **Further Submission FC76.4214.1 – S Collett – Support**
 - Supports submission point 76.6.30 which seeks to replace the word ‘ensure’ with ‘enable’ or ‘encourage’ due to the market viability of requiring higher density housing.
- **Submission Point 76.6-31 – Support:** Proposed changes to methods (a) and (b) and new method (ba) are supported.
- **Submission Point 76.6-32 – Support:** The two changes to section 6.2.30 ‘Principal Reasons and Explanation’ are supported.

- **Submission Point 76.6-33 – Support in Part:** Proposed to change Figure 6.8A and section 6.8.30 ‘Principal Reasons and Explanation’ to identify where the range of housing choices are expected to be available / provided for in specified development areas. It is noted that section 6.8.30 ‘Principal Reasons and Explanation’ also refers to Figure 6.8B which does not seem to be in the correct part of the TRMP.

Submitter’s Reason: Figure 6.8A is located within Section 6.6 “Richmond” but contains information, both existing and proposed, that relates to areas outside of Richmond. Amend and relocate Figure 6.8A.

- **Submission Point 76.6-34 – Support:** The proposed change to Issue 6.17.1.2 is supported.
- **Submission Point 76.6-35 – Support in Part:** Proposed amendment to Issue 6.17.1.6A to replace word “ensure” with “enable” or “encourage” in line with the wider planning framework.

Submitter’s Reason: The mandatory imposition of lot sizes and higher density housing options is opposed. A variety of housing will occur naturally. It is considered more appropriate to simply provide an enabling planning framework and encourage diversity, rather than to set strict requirements.

- **Submission Point 76.6-36 – Support:** Proposed a new Issue 6.17.1.7A that seeks to ensure the provision of emergency vehicle access to the WDA via Higgins Road. Retain issue.
- **Submission Point 76.6-37 – Support:** Proposed new policy (6.17.3.2A) that requires that flood risks and dam break hazards be managed in the WDA is supported.
- **Submission Point 76.6-38 – Support:** Proposed amendment to Policy 6.17.3.3 with a focus on supporting a range of residential options within the WDA. Retain policy.
- **Submission Point 76.6-39 – Support:** Proposed amendment to Policy 6.17.3.7 by adding reference to the WDA. Retain policy.
- **Submission Point 76.6-40 - Support in Part:** Proposed amendment to Policy 6.17.3.7A by removing the word “require” and replace with the word “enable”.
Submitters Reason: The mandatory imposition of lot sizes and higher density housing options is opposed. A variety of housing will occur naturally. It is considered more appropriate to simply provide an enabling planning framework and encourage diversity rather than set strict requirements.
- **Submission Point 76.6-41 – Support in Part:** Proposed amendment to Policy 6.17.3.7B by removing the word “require” and replace with the word “enable”.

Submitters Reason: As above.

- **Submission Point 76.6-42 – Support in Part:** Proposed amendment to Policy 6.17.3.12 to direct that the land be developed efficiently, so that pressure on land elsewhere is alleviated.

Submitters Reason: Policy 6.17.3.12 seeks to manage the effects of the expansion of Wakefield on land of high productive values by development that makes the efficient use of land. This policy seems to suggest that the subject land is highly productive, which the submitter considers that it is not. It is however considered appropriate to ensure greenfield land is used efficiently.

- **Submission Point 76.6-43 – Support in Part:** Proposed amendment to Method 6.17.20.1 to align with the enablement of variety and higher density housing options.

Submitters Reason: This involves a new method (d) which identifies a rule to “require a variety of lot zones and enable higher density housing options”. For the reasons also outlined above, the submitter considers that enabling or encouraging variety and higher density development is appropriate. Requiring or imposing mandatory requirements is opposed as this seeks to decide what the market wants in this location.

- **Submission Point – Support: 76.6-44:** 6.17.30 ‘Principal Reasons and Explanations’ is supported.

2.5.2 Reporting Officers Assessment and Recommendation

2.5.2.1 Discussion and Reasons

Submission Points 76.6-5, 76.6-6, 76.6-7, 76.6-9, 76.6-10, 76.6-12, 76.6-15, 76.6-24, 76.6-25, 76.6-26, 76.6-27, 76.6-28, 76.6-29, 76.6-31, 76.6-32, 76.6-34, 76.6-36, 76.6-37, 76.6-38, 76.6-39, and 76.6-44 are all in support of Topic 76.6 – Urban Environment Effects. These submission points will not be discussed in detail with the support recommended to be accepted.

Submission Point 76.6-1 (Neil Kitchen) indicates that no consultation has occurred with Waka Kotahi NZ Transport Agency (Waka Kotahi).

During the pre-consultation phase of engagement for PC76, consultation was undertaken with Waka Kotahi. The s32 Evaluation Report references this consultation. Unfortunately, the attachment detailing this consultation was in Appendix 3 of the s32 Evaluation Report and it was mistakenly not included within the final PDF document of the s32 Evaluation Report. A copy of the appendices of the s32 Evaluation Report is attached to this report to provide clarity in Appendix 9. Submission Point 76.6-1 is rejected on the basis that detailed consultation has occurred with Waka Kotahi on PC76.

Submission Points 76.6-2, 76.6-4, 76.6-17, 76.6-18, 76.6-19 and 76.6-21; Several submitters expressed safety and congestion concerns associated with the traffic generation from the proposed Wakefield Development Area and its impact on Pitfure Road, Whitby Road (SH6), Edward Street and associated roads.

The proposed Wakefield Development Area has indicative roading access points to Edward Street and access to Pitfure Road which feeds onto Whitby Road (SH6). Edward Street and Pitfure Road are heavy traffic transit routes for forestry and quarry industries. Submitters expressed concern around road safety with mention of the additional pressure on these roads once Wakefield School transitions to a primary/immediate school (in 2024) as Pitfure Road will include additional buses and students walking/cycling to school. Parking is also considered an issue on Pitfure Road with the size of the road meaning traffic is reduced to one-way when cars are parked on both sides of the road.

Submitter 4207 (Neil Kitchen) is also concerned about the effects of PC76 on the wider traffic network of Wakefield and the safety of Great Taste Trail cyclists crossing Edward Street with the expected additional traffic.

The Nelson Tasman eBus route goes along Pitfure Street stopping opposite Ryeland Avenue and at the Wakefield Village Hall on Whitby Way. Figure 14 shows an aerial of the roading network surrounding the Wakefield Development Area.

Figure 14 Aerial of the Road Network surrounding the proposed Wakefield Development Area.



Waka Kotahi have also expressed concerns around the effects of the increased traffic via both active and private transport modes on the roading network and have requested (Submission Point 76.17-1 refer Report Section 2.7.2.1) the inclusion of a requirement for an Integrated Transport Assessment at the resource consent stage to determine the effects of increased traffic on the network particularly at the intersection with Pitfure Road and SH6. Waka Kotahi have requesting that the residential zoning is deferred until appropriate roading upgrades have been undertaken. Noting that these upgrades should be informed by the Integrated Transport Assessment.

An Integrated Transport Assessment is defined in the TRMP as:

Integrated Transport Assessment – *Integrated transport assessments consider the proposed impact of a development on the transport network and the effectiveness of any potential mitigation measures to address adverse impacts. The Integrated Transport Assessment should include a review of relevant planning documents and infrastructure plans, needs to consider all modes of transport and should incorporate methods of reducing reliance on private cars.*

The Councils Senior Transportation Engineer – Bill Rice agrees that the plan change is likely to increase traffic volumes on Pitfure Road and its intersection with SH6. In addition, it is likely to impact on the intersection with Martin Avenue as well as increase pedestrians on Pitfure Road (refer to Appendix 7 – Supporting Evidence). As such, Council considers it appropriate to include a requirement for an Integrated Transport Assessment at the resource consent stage and deferment of the residential zoning until appropriate upgrades have been completed (or agreed) as informed by the Integrated Transport Assessment. Amendments are therefore recommended to provisions 6.17.1, 6.17.3, 17.14A, rule 19.2.2.7 (f), and rule 16.3.3.1(18)(g)(gb). Refer to Report Section 2.7.2.1 for a response to Waka Kotahi’s submission (76.17-1).

It is recommended that these submissions points are accepted with amendments recommended to the TRMP Schedule (Appendix 1).

Submission Point 76.6-3 (Neil Kitchen) seeks consideration of the upgrading of Higgins Road to include a roundabout at the junction at the Bird Lane and SH6 intersection.

Higgins Road is not an access route to the Wakefield Development Area. The location of Higgins Road is shown in Figure 15. The indicative road layout outlined in Area Map 76/1 shows a connection to Higgins Road however this connection is to be restricted to emergency access only. There will be no additional traffic on Higgins Road from the development area and therefore there is no requirement to upgrade the road or the SH6 intersection. This submission point is recommended to be rejected.

Figure 15 Aerial of Higgins Road and the proposed Wakefield Development Area.



Submission Point 76.6-22 (Homes for Wakefield) opposes the emergency exit onto Higgins Road and would prefer this as a permanent access. **Further Submission Point FC76.4211.7** supports the use of the Higgins Road for emergency access only as is currently proposed.

During the Wakefield Community Council Meeting (15 November 2021), members of the community expressed a desire for the growth area to have vehicle access via Higgins Road, rather than sole vehicle access via Pitfure Road. Drew Bryant, Senior Infrastructure Transport Advisor (23 February 2022) advised that regular vehicle access via Higgins Road has been deemed to be unnecessary, given that adequate vehicle access can be provided via Pitfure Road, and cost prohibitive, as various upgrades would be required on Higgins Road, including a bridge upgrade, the widening of Higgins Road to Bird Road, and an upgrade to the Bird Road/SH6 intersection. The use of Higgins Road as a regular vehicle access would also impact the Tasman Great Taste Trail which currently uses this route. During the course of the plan change process Drew Byrant resigned. Bill Rice is now the Councils Senior Infrastructure Planning Advisor Transportation and has provided evidence for this report. Refer to Appendix 7 for his evidence.

Multiple access routes are important in the event of an emergency, Higgins Road is proposed to be used for this purpose with bollards that can be lowered to allow access in an emergency event. PC76 enables future public vehicle access to Higgins Road (should it be required) through the inclusion of an indicative road which is identified on Area Map 76/1.

It is recommended to retain the emergency access only to Higgins Road as proposed. This submission point is recommended to be rejected.

Submission Point 76.6-8 by Waka Kotahi (4206) supports the direction and intent of the plan change to promote increased density in the proposed Wakefield Development Area but considers that an amendment or clarification needs to be made for the use of the word '*higher density*' which may be confused with high density. The wording '*higher density*' is not defined in the Proposed Plan Change. The use of the wording '*higher density*' in PC76 is in reference to the objective of PC76 which is to encourage intensification and the achievement of a variety of densities and housing options. It refers to the changes that enable and encourage the use of the Compact Density Development in the Proposed Plan Change area. This assists with meeting the need to provide higher density housing options including townhouses, flats and retirement units which are all considered appropriate options to achieve greater density in the proposed Wakefield Development Area.

The National Planning Standards (NPSs) include a '*High Density Residential Zone*' which is described as '*Areas used predominantly for residential activities with high concentration and bulk of buildings, such as apartments, and other compatible activities*'. On reflection it is considered that the use of the words '*higher density*' may create confusion with the High Density Residential Zone which relates to a higher density housing scale and form. The proposed Wakefield Development Area is not considered suitable as a future High Density Residential Zone due to the urban form that surrounds it and distance to commercial centres. It is therefore accepted that the wording '*higher density*' could cause confusion.

The s32 Evaluation Report stipulates that the objective of PC76 is to provide additional land for residential housing and encourage both intensification and a variety of densities within the proposed Wakefield Development Area. It is therefore considered appropriate to align policy wording with the objective and amend the wording from '*higher density*' to '*increased and varied housing densities and types*'. This wording is considered to achieve the intent of the policy without creating confusion.

A change to the proposed wording to remove reference to '*higher density*' is recommended as noted above and is recommended for TRMP Policies 6.2.3.2B, 6.17.1.6A, 6.17.20.1(d), 6.17.3.7A and 6.17.3.7B – Refer to TRMP Schedule (Appendix 1) for recommended amendments.

Submission Point 76.6-11 Waka Kotahi seek clarification as to where the '*cycling*' distance component of '*walking and cycling distance*' has arisen from as described in TRMP Section 6.8.30. Cycling distances/catchment areas are very different compared to walking.

Section 6.8.30 Principal Reasons and Explanation - makes a general statement about intensive residential development being promoted and encouraged within walking and cycling distances. It is unsure why clarity of the cycling distance is required within this general overview section of the TRMP as it relates to the Wakefield Development Area as the area is within 1km of the Wakefield Town Centre and is within cycling distance to the town centre.

It is recommended that this point be rejected.

Submission Point 76.6-14 Waka Kotahi recommend combining Policies 6.17.3.7A and 6.17.3.7B. These policies are considered to be appropriately worded as one refers to achieving a high standard of residential amenity through the urban design guide (6.17.3.7A) and the other refers to encouraging compact density

development through the use of non-notified provisions (6.17.3.7B). No change is considered appropriate and this submission point is therefore rejected.

Submission Point 76.6-20 is in opposition to the section within the s32 Evaluation Report which discusses reverse sensitivity and cross boundary effects. Submitter 4209 seeks a diversion for heavy vehicles from Edward Street and Pitfure Road. Changing the roading network external to the proposed Wakefield Development Area is out of scope of PC76. The use of the Edward Road and Pitfure Road by heavy vehicles for logging and quarrying is not an issue that can be considered through the PC76 process.

It is recommended that this submission point is rejected due to being out of scope.

Submission Point 76.6-23 questions the flood modelling data and requests the consideration of requiring water collection tanks in new development to delay the release of stormwater during large rainfall events.

Figure 6 depicts the modelled extent of a present-day 1% annual exceedance probability flood for Wakefield. The criteria for flood modelling is set out in the NTLDM which includes capacity requirements for stormwater systems. Under TRMP provisions, development within the Wakefield Development Area is required to demonstrate effective flood risk management. In addition, the development must comply with the NTLDM which sets out accepted methods and design standards to manage flood risks which may include providing detention in rain tanks and other detention devices.

Flood modelling indicates that the lower terraces adjacent to the Pitfure Stream area are required to accommodate flood flows. Advice from Glenn Stevens, the Council's Senior Resource Scientist – Hazards includes a recommendation that an indicative reserve be included in PC76 which incorporates the lower terrace of the Pitfure Stream and provides a buffer area to accommodate flood waters – refer to Appendix 5. The Reserves team also support the inclusion of an esplanade reserve for recreational purposes along the Pitfure Stream, Gossey Stream and Jenkins Creek (where they are within the development area). The exact residential setback, and therefore the extent of the land area required to accommodate flood flows is to be confirmed as part of the resource consent process. The indicative status of the reserves allows for finalisation of the actual extent of land required during the subdivision process. This includes consideration of stormwater management requirements for the purpose of lifting the deferred zone status proposed to be applied to this land.

The management of flood risk is referred to in several areas of the TRMP including Chapter 6 (6.17.3.2, 6.17.3.2A and 6.17.30) which requires the subdivision and development of land within the Wakefield Development Area to be managed to avoid significant flooding hazard risks on and beyond the site. Explanations under 6.17.30 also refer to the requirement for development to be directed to the upper terraces or designed to manage flood risk. Under Subdivision rule 16.3.3.1 a matter of control for a subdivision application includes a requirement to manage flood hazard risk.

The installation of rainwater tanks is not a requirement for new development in the district. The NTLDM sets out detention requirements. To meet detention requirements developers may consider rainwater tanks, detention basins, ponds and wetlands or a combination provided they meet the requirements of the NTLDM.

It is recommended to reject this submission point.

Submission Point 76.6-30, 76.6-35, 76.6-40, 76.6-41 and 76.6-43 requests amendments to provisions including Policy 6.2.3.2B which as notified stipulates;

'To ensure efficient land use in the Brightwater Development Area and Wakefield Development Area by requiring subdivisions that result in a variety of lot sizes, including higher density housing options.'

The submitter (4211) considers that this policy is inconsistent with the encouraging and enabling provisions provided in related policies. No references to the 'other' policies that are being referred to is provided as part of the submission.

Submission Point 76.6-35 requests that the wording of Policy 6.17.1.6A is amended from 'ensuring' to 'enable'. The objectives of PC76 are to ensure that a variety of housing options are included within the development area. Changing the word to 'enable' would lessen the strength of the policy and reduce the ability of PC76 to meet its objective. Changes are recommended to several provisions of the TRMP including Policy 6.17.1.6A which remove the reference to 'higher density' and replace with the wording 'housing densities and types'.

The submitter (4211) is the owner of the land associated with PC76 and states as part of Submission Point 76.6-30 that the approach applied in Policy 6.2.3.2B *'is considered to create a significant risk to the developers of this land'. 'This is because there are a number of factors / considerations that influence subdivision design, layout and density, such as market demand and servicing constraints.'* The submission point seeks a change in wording from 'encourage' and 'enable' higher density options rather than 'requiring'.

The objective of the Proposed Plan Change is to provide additional land for residential housing and encourage both intensification and a variety of densities to respond to issues around the need to provide for population growth, to manage housing affordability and ensure the efficient use of land. It is recommended to amend the wording of this policy to stipulate;

6.2.3.2B *To ensure efficient land use in the Brightwater Development Area and Wakefield Development Areas by requiring subdivisions and developments that result in which enable increased and varied housing densities and types including two dwellings on certain lots a variety of lot sizes, including higher density housing options.*

It is considered that the use of the wording higher density housing options is inappropriate as the PC76 seeks medium density housing options – a change to this wording is proposed for TRMP Policy 6.2.3.2B as outlined above. Note that due to PC 75 – Brightwater Growth Plan Change becoming operative on 20 October 2023 the numbering of this provision has changed to 6.2.3.2C.

This submission point about the use of the word 'requiring' is recommended to be rejected on the basis that PC76 seeks a variety of lot sizes and densities to make the most efficient use of the land. To make the most efficient use of land the use of the word 'requiring' is important as it ensures that this important objective of PC76 is met. Changing the wording to 'encourage' and 'enable' provides an opportunity for increased and varied housing densities and types to become an option and as such the outcomes to achieve the increased and varied housing densities and make the most efficient use of the land may not be achieved.

In addition, the submitter has provided no evidence to support their statement that Policy 6.2.3.2B provides a significant risk to the developers of the land as stated in the submission point.

It is recommended that these submission points be rejected.

Submission Point 76.6-33 Wakefield Village Development Ltd seeks an amendment to the location of Figure 6.8A which is a table that shows the range of housing choices that are provided for in specified development areas elsewhere in the District. This table sits under Section 6.8 of the TRMP which has a heading Richmond. Figure 6.8A includes reference to other areas within the district not just Richmond. The submitter objects to the location of this table under Section 6.8.

Over the years the TRMP has had many alterations made to it and the flow of the document in some cases is out of step. To prevent confusion, the proposed Wakefield Development Area has been added to Figure 6.8A which also includes reference to other areas within the District. This is the most obvious place to include the

information on the range of housing choices without creating a complete re-structure of the TRMP and is consistent with the existing approach. The TRMP will in time be replaced with a 'new' plan, it is at this stage that the structure of the plan will be re-evaluated.

The submitter also questions the location of Figure 6.8B which is located after Figure 6.8A and relates to Richmond only. Figure 6.8B is not considered to be problematic in its current TRMP location as it relates to Richmond only. Amending its TRMP location is out of scope of this plan change which relates to Wakefield.

On the basis of the above, it is recommended that the submission point be rejected.

Submission Point 76.6-42 (Wakefield Village Development Ltd) seeks an amendment to Policy 6.17.3.12 which refers to the proposed Wakefield Development Area as land of high productive values. The submitter objects to this policy on the basis that the land is not highly productive and seeks an amendment to the policy to direct that the land be developed efficiently, so that pressure on land elsewhere is alleviated.

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 including the Land Use Capability (LUC) classification system, which is used in the National Policy Statement – Highly Productive Soils. 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. Overall, parts of the plan change area are classified as highly productive. However, the actual productive capability of the site is limited due to existing Residential and deferred Rural Residential land which is not classified. Under the National Policy Statement – Highly Productive Land (which came into effect on 17 October 2022) any land that is classified as LUC3 is considered highly productive. The inclusion of the wording in Policy 6.17.3.12 around high productive values is therefore considered relevant and it is recommended that the submission point be rejected.

2.5.2.2 Recommendation

Submitter Name No. and Point	Recommendation	Reason
Neil Kitchen 4207-76.6-1	Reject	Consultation was undertaken with Waka Kotahi and is attached in Appendix 9.
Neil Kitchen 4207-76.6-2	Accept and amendments to Schedule 17.14A, rule 19.2.2.7 (f), rule 16.3.3.1(18)(g)(gb) and Chapter 2.2.	Amendment to include deferment for roading improvements to the Pitfure Road and the intersection with SH6 and the requirement for an Integrated Transport Assessment.
Neil Kitchen 4207-76.6-3	Reject	Regular vehicle access via Higgins Road has been deemed to be unnecessary, given that adequate vehicle access can be provided via Pitfure Road, and cost prohibitive, as various upgrades would be required on Higgins Road, including a bridge upgrade, the widening of Higgins Road to Bird Road, and an upgrade to the Bird Road/SH6 intersection. Multiple access routes are important in the event of

		an emergency, PC76 enables future public vehicle access to Higgins Road (should it be required) through the inclusion of an indicative road which is identified on Area Map 76/1.
Neil Kitchen 4207-76.6-4 Jean Gorman FC76.3653.1 Wakefield Village Development Ltd FC76.4211.4	Accept and amendments to Schedule 17.14A, rule 19.2.2.7 (f), rule 16.3.3.1(18)(g)(gb) and Chapter 2.2. Accept Accept	Amendment to include deferment for roading improvements to the Pitfure Road and the intersection with SH6 and the requirement for an Integrated Transport Assessment.
Waka Kotahi 4206 - 76.6-5, 76.6-6, 76.6-7, 76.6-9, 76.6-10, 76.6-12, 76.6-15	Accept	In support
Waka Kotahi 4206- 76.6-8	Accept and amend TRMP Policies 6.2.3.2B, 6.17.1.6A, 6.17.20.1(d), 6.17.3.7A and 6.17.3.7B	Amend the wording from <i>'higher density'</i> to <i>'increased and varied housing densities and types'</i> .
Waka Kotahi 4206- 76.6-11	Reject	The Wakefield Development Area is within 1km of the Wakefield Town Centre and is therefore within cycling distance.
Waka Kotahi 4206-76.6.13	Accept and amend TRMP Policies 6.2.3.2B, 6.17.1.6A, 6.17.20.1(d), 6.17.3.7A and 6.17.3.7B	Amend the wording from <i>'higher density'</i> to <i>'increased and varied housing densities and types'</i> .
Waka Kotahi 4206-76.6.14	Reject	The policy wording is considered appropriate.
Waka Kotahi 4206-76.6.16	Accept and amend TRMP Policies 6.2.3.2B, 6.17.1.6A, 6.17.20.1(d), 6.17.3.7A and 6.17.3.7B	Amend the wording from <i>'higher density'</i> to <i>'increased and varied housing densities and types'</i> .
Peter Carmody 4154- 76.6.17, 4154- 76.6.18	Accept and amendments to Schedule 17.14A, rule 19.2.2.7	Amendment to include deferment for roading improvements to the Pitfure Road and the intersection with SH6 and the

	(f), rule 16.3.3.1(18)(g)(gb) and Chapter 2.2.	requirement for an Integrated Transport Assessment.
Chris and Lesley Olaman 4208-76.6.19	Accept and amendments to Schedule 17.14A, rule 19.2.2.7 (f), rule 16.3.3.1(18)(g)(gb) and Chapter 2.2.	Amendment to include deferment for roading improvements to the Pitfure Road and the intersection with SH6 and the requirement for an Integrated Transport Assessment.
Homes for Wakefield 4209- 76.6.20	Reject	The use of Edward Road and Pitfure Road by heavy vehicles is not an issue that can be resolved through the PC76 process.
Homes for Wakefield 4209- 76.6.21	Accept and amendments to Schedule 17.14A, rule 19.2.2.7 (f), rule 16.3.3.1(18)(g)(gb) and Chapter 2.2.	Amendment to include deferment for roading improvements to the Pitfure Road and the intersection with SH6 and the requirement for an Integrated Transport Assessment.
Homes for Wakefield 4209- 76.6.22	Reject	Upgrading Higgins Road is not considered necessary given adequate access can be provided via Pitfure Road. It is recommended to retain the emergency access only to Higgins Road as proposed.
Wakefield Village Development Ltd FC76.4211.7	Accept	Supports use of Higgins Road for Emergency Access only.
Homes for Wakefield 4209- 76.6.23	Reject	Council is satisfied with TRMP Provisions. Requiring rainwater tanks is out of scope with PC76.
Wakefield Village Development Ltd 4211-76.6-24, 76.6-25, 76.6-26, 76.6-27, 76.6-28, 76.6-29, 76.6-31, 76.6-32, 76.6-34, 76.6-36, 76.6-37, 76.6-38, 76.6-39, and 76.6-44	Accept	Submissions support PC76
Wakefield Village Development Ltd 4211-76.6-30, 4211-76.6-35, 4211-76.6-40, 4211-76.6-41,	Reject partially and amend TRMP Policy 6.2.3.2B	<i>Amend 6.2.3.2B to enable increased and varied housing densities and types including reference to second dwellings on certain lots.</i>

4211-76.6-43 S Collett FC76.4214.1		
Wakefield Village Development Ltd 4211-76.6-33	Reject	Changing the structure of the TRMP is not considered appropriate.
Wakefield Village Development Ltd 4211-76.6-42	Reject	Part of the land is classified as having high productive values therefore it is considered relevant to include Policy 6.17.3.12.

2.6 Topic 76.16: Subdivision

2.6.1 Submission Requests

There were several Submissions Points in support of Topic 76.16, these were 76.16-1, 76.16-4, 76.16-5, 76.16-7, and 76.16-12. These Submissions Points will not be discussed further as the support accepted.

2.6.1.1 Submitter 4206: Waka Kotahi

- **Submission Point 76.16-2 – Support in part:** Wakefield Development Area explanation for non-notification refers to Brightwater in error in Sections 16.3 and 16.2.20. This should be revised.

2.6.1.2 Submitter 4211: Wakefield Village Development Ltd

- **Submission Point 76.16-3 – Oppose:** Opposes Rule 16.3.3.1 and seeks change to Figure 16.3A. The proposed changes to Figure 16.3A (xiii and xiv) are opposed. Relief Sought: Delete proposed change to Figure 16.3A and substitute these requirements with an enabling planning framework.

Submitters Reason: These changes are opposed as the introduction of a rule framework relating to the size of parent titles (less than or greater than 2 hectares) has no practical relevance to the subject land under single ownership and in one large title. This will require 20% of all allotments being 'high density' (270m² to 350m²), and 20% 'medium density' (350m² to 450m²). Note that the use of the term 'high density' is the submitter's own. The proposed changes to Figure 16.3A are considered to be unrealistic for Wakefield and unreasonable when the wide range of factors are considered in undertaking subdivision development. In addition, enabling two dwellings to be constructed on a single Certificate of Title would provide an opportunity to help support a wider range of circumstances, such as dependent relative and entry into the housing market with support from family.

- **Submission Point 76.16-6 – Oppose:** Opposes the proposed change to Rule 16.3.3.1(n), combined with the new 16.3.3.1B (addressed in submission point 76.16-8).

Submitters Reasons: This is opposed on the basis that the minimum density requirements are considered to be unrealistic and unreasonable.

- **Submission Point 76.16-8 – Oppose:** Opposes new Rule 16.3.3.1B, combined with the new Rule 16.3.3.1 (n) (addressed above in Submission Point 76.16-6).

Submitters Reasons: It is opposed on the basis that the minimum density requirements are considered to be unrealistic and unreasonable.

- **Submission Point 76.16-9 – Oppose:** Opposes change to Rule 16.3.3.2A(c)(i) continue the approach of having minimum allotment areas related to whether the land to be subdivided is less than or greater than 2 hectares.

Submitters Reasons: The 2-hectare threshold is erroneous as the subject land in the WDA is all greater than 2-hectares, and in single ownership, and so has little practical relevance. As such this rule and associated rules/provisions, such as 16.3.3.2C, are opposed.

- **Submission Point 76.16-10 – Oppose:** Opposes the changes proposed to Rule 16.3.3.4 as it would make the activity of subdivision a noncomplying activity if the density requirements in Rule 16.3.3.1B(a) are not complied with.

Submitters Reasons: The activity status is considered to be overly directive given the range of factors that may lead to a subdivision that does not achieve the density requirements. Hence, while the density requirements are themselves opposed, so too is this proposed non-complying activity status.

- **Submission Point 76.16-11 – Oppose:** Opposes 16.3.20 and the reasons for the above rules as they are explained in 16.2.30 ‘Principal Reasons for Rules’.

Submitters Reasons: The explanation is considered necessary and appropriate, however for the reasons set out in this wider submission, the proposed requirement 20% high density and 20% medium density is opposed. This is because these requirements are unrealistic and unreasonable.

2.6.2 Reporting Officer Assessment and Recommendation – Higher Density

2.6.2.1 Discussion and Reasons

Submission Point 76.16-2: (Waka Kotahi) Seeks a revision of 16.2.30 ‘Principal Reasons for Rules’ to include the proposed Wakefield Development Area, stating that Brightwater is referenced in error. This change is supported in reference to 16.3.20 . It is recommended that this submission point is accepted.

Submission Points 76.16-3, 76.16-6, 76.16-8, 76.16-9, 76.16-10, 76.16-11: This opposition is in reference to provisions which seek to achieve a mixture of densities including medium density housing.

The submitter (Wakefield Village Development Ltd) states *‘The mandatory imposition of lot sizes is opposed. A variety will occur naturally. It is considered more appropriate to simply provide an enabling planning framework and encourage diversity rather than set strict requirements’.*

The submission (76.16-3, 76.16-6, 76.16-8) by Wakefield Village Development Ltd (4211) opposes changes to Figure 16.3A (xiii and xiv), rules 16.3.3.1(n) and 16.3.3.1B on the basis that the minimum density requirements are considered unreasonable. They request the deletion of 16.3.3.1(n) and a replacement with an enabling framework (Submission Point 76.16.11). Wakefield Village Development Ltd request as part of their submission enabling two dwellings to be constructed on a single certificate to enable dependant relatives to enter the housing market.

The submitter also opposes the 2- hectare threshold, stating that *‘it is erroneous as the subject land is all greater than 2 hectares, and in single ownership and so has little practical relevance’* (Submission Point 76.16-9).

Wakefield Village Development Ltd also request the removal of the non-complying activity status of proposed rule 16.3.3.4 (Submission Point 76.16-10). Rule 16.3.3.4 would make the activity of subdivision a non-complying activity if the density requirements of 16.3.3.1B(a) are not complied with. The submitter considers this approach overly directive.

The objective of PC76 is to provide additional land for residential housing and encourage both intensification and a variety of densities to respond to issues around the need to provide for population growth, to manage housing affordability and ensure the efficient use of land.

The proposed PC76 text includes prescribed mandatory lot sizes to achieve the objective of the PC76 and meet the requirements of the National Policy Statement on Urban Development (NPS UD). The 2024 Tasman Housing and Business Assessment indicates that demand exists for over 800 dwellings in Wakefield over the next 30 years. There is evidence from multiple sources including the Nelson Tasman Future Development Strategy 2022 Submissions, the Housing We'd Choose Survey 2021 and Homes for Wakefield Survey 2020 that smaller housing typologies and providing for affordable housing needs are required in Wakefield and in the wider Tasman District as a whole. Detailed evidence of the documentation supporting the need to provide a variety of houses typologies is provided by Jacqui Deans, Councils Growth Co-ordinator (Appendix 8).

Objective 1 and Policy 1 of the NPS UD seeks well functioning urban environments to enable a variety of homes that (i) meet the needs, in terms of type, price and location of different households. Plan Change 76 is being progressed to meet Council's obligation under the RMA to provide at least sufficient capacity to meet housing demand. It is implementing the adopted 2022-2052 Future Development Strategy (FDS) which identifies land for residential and business growth.

Amendments are recommended (and included in Appendix 1) to ensure the provisions are realistic for development in Wakefield and enabling, whilst also meeting the objectives of PC76. The proposed amendments have been developed to ensure that a variety of housing options are achieved, and greenfield land is used efficiently. It is considered that the amended provisions will meet the objectives of PC76.

The amendments include a reframing of the minimum net area to 200m², changes to the allotment average net site percentages, removing the 2 hectare requirement, and the addition of a second dwelling as a permitted activity for sites over 600m². The s32AA report attached in Appendix 2 provides a detailed evaluation under the RMA of the recommended amendments. Amendments are recommended and presented in Appendix 1 to the following TRMP sections; Figure 16.3A (xiii), 16.3.3.1(B)(a), 17.1.3.1A and 16.3.3.2A(c) (i). Policy 6.17.3.7C is also recommended to be added to support this smaller and more compact housing typologies throughout the development.

As a result of the recommended changes above additional provisions have been included to ensure high urban design standards are achieved as densities increase. Additions are proposed with Rule 16.3.3.1 (e) and Rule 17.1.3.1 (m) (iii) and (zca) to ensure a significant number of lots are directly fronting a public road or reserve, and fence heights fronting reserves are minimised to creating a feeling of openness and connection with the environment. Amendments have also been included within Rule 17.1.3.1A including site and building coverage and outdoor living space. A detailed analysis of this changes is included in the s32AA Report in Appendix 2.

The non-complying activity status is also opposed by submitter 4211 under Submission Point 76.16-10. This activity status is considered essential to ensure that the density requirements are achieved and the objectives of PC76 are met, one being the most efficient use of the land. No change to this status is recommended.

2.6.2.2 Recommendation

Submitter Name No. and Point	Recommendation	Reason
Waka Kotahi 4206-76.16-1,	Accept	In support
Wakefield Village Development Ltd	Accept	In support

4211-76.16-2, 76.16-4, 76.16-5, 76.16-4, 76.16-5, 76.16-7, 76.16-12		
Waka Kotahi 4206-76.16-2	Accept	Amendment to 16.3.20 supported
Wakefield Village Development Ltd 4211-76.16-3, 4211-76.16-6, 4211-76.16-8, 4211-76.16-9, 4211-76.16-11	Partially accept with amendment to Figure 16.3A (xiii), 16.3.3.1(B)(a), 17.1.3.1A and 16.3.3.2A(c) (i).	Refer to Appendix 1
Wakefield Village Development Ltd 4211-76.16-10	Reject changes to non- complying status (16.3.3.7)	Considered important to retain this status

2.7 Topic 76.17: Zone Rules

2.7.1 Submission Request

There were several submission points in support of Topic 76.17 these include; 76.17-2, 76.17-3, 76.17-4, 76.17-5 and 76.17-6. These submission points will not be discussed in detail with the support recommended to be accepted.

2.7.1.1 Submitter 4206: Waka Kotahi

- **Submission Point 76.17-1 Support in part:** Waka Kotahi submits that the land be deferred until Council and Waka Kotahi are both satisfied with the transport related effects, particularly the intersection of SH6 and Pitfure Road.

- **Further Submission FC76.4211.6 – Wakefield Village Development Ltd – Support:**
 - Supports Submission Point 76.17-1 for the deferment of the new residential zone until servicing constraints have been addressed.

2.7.2 Reporting Officer Assessment and Recommendation

2.7.2.1 Discussion and Reasons

Submission Point 76.17-1 refers to concerns from Waka Kotahi (4206) around the transport related effects from the development with particular reference to the intersection with SH6 and Pitfure Road.

Waka Kotahi request the inclusion of a requirement for an Integrated Transport Assessment (ITA) at the resource consent stage to determine the effects of increased traffic onto the network particularly at the intersection with Pitfure Road and SH6. Requesting that the residential zoning is deferred until appropriate upgrades to the intersection and its surrounds informed by the ITA are undertaken.

The deferment of the residential land until services are provided for is supported by **Further Submission FC76.4211.6** by Wakefield Village Development Ltd.

The Councils Senior Infrastructure Planning Advisor Transportation – Bill Rice supports Waka Kotahi’s request and considers it appropriate to include a requirement for an Integrated Transport Assessment at the resource consent stage and deferment of the residential zoning. As such an amendment to Schedule 17.14A is recommended which includes a requirement for the deferment of the (residentially deferred) land until transport upgrades are completed or agreed as identified through an Integrated Transport Assessment. The consideration of lifting the deferred zone status can be incremental enabling staged development to occur. This is identified in TRMP provision 17.14.2 (a) (i) which includes reference to enabling a deferment to be uplifted in staged way provided it is to the satisfaction of council.

In addition, under rule 19.2.2.7 (f) with a subdivision resource consent application there is a requirement to provide an Integrated Transport Assessment by an appropriately qualified and experienced expert. For a development in the Wakefield Development Area to be a controlled activity it must also meet the recommendations of the Integrated Transport Assessment (rule 16.3.3.1(18)(g)(gb)). A definition of Integrated Transport Assessment is included under Chapter 2.2 – Defined Words.

2.7.2.2 Recommendation

Submitter Name No. and Point	Recommendation	Reason
Wakefield Village Development Ltd 4211-76.17-2, 76.17-3, 76.17-4, 76.17-5, 76.16-6	Accept	In support
Waka Kotahi 4206-76.17-1 Wakefield Village Development Ltd FC76.4211.6	Accept and amend Schedule 17.14A, 19.2.2.7(f), (rule 16.3.3.1(18)(g)(gb) and Chapter 2.2 Accept	Amendments to Schedule 17.14A to include deferment until roading improvements to the Pitfure Road and the intersection with SH6 are undertaken. Amendment also to rule 19.2.2.7(f) to include a requirement for an Integrated Transport Assessment with a subdivision resource consent and 16.3.3.1(18)(gb) controlled requirements.

2.8 Topic 76.19: Information Requirements

2.8.1 Submission Requests

One submission point was received in support (76.19-1) of Topic 76.19. This submission point will not be discussed in detail with the support recommended to be accepted.

2.8.1.1 Submitter 4211: Wakefield Village Development Ltd

- **Submission Point 76.19-2 – Oppose:** Oppose and seek amendment of 19.2.2.7 ‘Information Requirements’ to ensure the appropriate range of considerations are included. Matters such as a) market demand; b) serviceability; c) subdivision design considerations.

2.8.2 Reporting Officer Assessment and Recommendation

2.8.2.1 Discussion and Reasons

Submission Point 76.19-2 seeks an amendment to 19.2.2.7 – Information Requirements.

It is not recommended to change the intent of the 19.2.2.7 to include a requirement for matters such as market demand, serviceability or subdivision design considerations. 19.2.2.7 (f)(i) stipulates for the Wakefield Development Area; *‘Information on how a variety of lot sizes is achieved and will create an opportunity for housing options or – where this is not practicable justify why.* The points made by the submitter can be accommodated under this provision. It is recommended the submission point be rejected on this basis.

2.8.2.2 Recommendation

Submitter Name No. and Point	Recommendation	Reason
Wakefield Village Development Ltd 4211-76.19-1	Accept	In support
Wakefield Village Development Ltd 4211-76.19-2	Reject noting minor wording amendments to 19.2.2.7 (f)(i)	19.2.2.7 (f)(i) adequately addresses the submitters concerns.

2.9 Issue 76.P2.A2 – Part II Appendix 2: Urban Design Guide

2.9.1 Submission Requests

Two submission points were received in support (76.P2.A2-1 and 76.P2.A2-2) of Topic 76.P2.A2. These submissions points will not be discussed in detail with the support recommended to be accepted.

2.9.2 Reporting Officer Assessment and Report

2.9.2.1 Discussion and Reasons

Submission points 76.PS.A2-1 and 76.P2.A2-2 - the support for the provisions is accepted.

2.9.2.2 Recommendation

Submitter Name No. and Point	Recommendation	Reason
Waka Kotahi 4206-76.P2.A2-1	Accept	In support
Wakefield Village Development Ltd 4211-76.P2.A2-2	Accept	In support

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Appendix 9: s32A Report

Section 32A Report including Appendices.

- s32A Report Appendix 1 2020 Sense Partners Report ‘Understanding the impacts of releasing greenfields sites for development’.
- s32A Report Appendix 2 Background Report.
- s32A Report Appendix 3 Engagement Summary.
- s32A Report Appendix 4 Operative Regional Policy Statement and Resource Management Plans.

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