Tasman Resource Management Plan (TRMP) Summary of Submissions by Submitter – Erratum Version Full Record

Top of the South Dark Sky Committee and Supporters

Submitter 1

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS1.1	Proposed Plan Change No. 81	Amend	Seeks inclusion of Dark Sky protections into Plan Change 81. Refer to list of inclusions sought in documentation.	Neither Plan Change 81 or 1 address lighting requirements. As both allow for more and new development. We believe it is essential to prevent further light pollution that will result from such development. Further we are advised the LDM is not yet ready to update so request changes be made at this level in the meantime.	New lighting requirements for all new developments in the District

Georgia Kingsbury

Submitter 2

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS2.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Oppose	I am making a submission as I oppose proposed plan change 81 - urban growth. I am a resident on Starveall street in Brightwater, where it has been proposed to change from residential zone to medium density residential zone. Council should refuse this change because I think this area needs to stay as residential.	I think of Brightwater of a small town with a semi rural feel. It is a place with more of a country feel, with sunny houses and views of the hills, with no obstructions from multi story buildings. Which to me is a selling point for people who want a more spacious, and peaceful community. This is why I think it needs to stay zoned as residential. I know we chose to move to Brightwater because it is less built up than Richmond, and we did not want to be packed in like sardines.	Opposes rezoning of residential land on Starveall Street in Brightwater to medium density residential.

Rodney and Michelle Fromont

Submitter 3

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS3.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.13	Support	Retain zoning as proposed	We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2.	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone.

	Papakainga Zone Rules				
OS3.2	Proposed Plan Change No. 81 > Maps > Area Maps	Oppose	We ask the Council to keep Redmill Road as a cul-de-sac, to provide any connectivity to the new development as a walking/cycling path rather than a road, to require a full site-specific assessment of effects before any vehicle connection to Redmill Road could be relied upon, and to support instead a direct Stringer Road–La Mer View connection.	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffic for this area – duplicating a connection the highway already provides. Its only practical effect would be to divert traffic off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefit to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefit claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection. Refer to submission for further information.	We oppose, and seek protection against, any provision for or reliance upon a vehicle through connection between Stringer Road and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision.
OS3.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.13 Papakainga Zone Rules	Amend	Amend Papakainga Zone as it relates to T-226 by (i) identify a cul-de-sac together with a dedicated walking/cycling path as the preferred form of access and connectivity for the site; and - (ii) require that any vehicle connection between Stringer Road and Redmill Road be subject to a site-specific assessment of transport, safety, amenity, rural character, the registered consent-notice controls (Consent Notice 11141705.5), stormwater and construction effects on existing Redmill Road properties before it may be provided for or relied upon.	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffic for this area – duplicating a connection the highway already provides. Its only practical effect would be to divert traffic off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefit to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefit claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection	Amend Plan Change 81 so that the provisions applying to the Papakāinga Zone at T-226 (whether as a zone policy, an assessment matter, or an associated method)

Max Brown

Submitter 4

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS4.1	Proposed Plan Change No. 81	Support	The council should accept Plan Change 81, as it will improve access to housing in Tasman District and support economic development.	Plan Change 81 will reduce the need for greenfield development by improving housing capacity in existing areas, avoiding the problems discussed in the last paragraph (refer to submission) Additionally, the denser housing allowed by Plan Change 81 will mean that travel by walking, cycling, or public transport is easier because more people live closer to their destinations. This reduces greenhouse gas emissions, gives residents more choice over their mobility, and reduces the council spending needed on road maintenance.	The council should accept Plan Change 81, as it will improve access to housing in Tasman District and support economic development.

OS4.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Provision 17.1A.3.2 (l) (ii) should be deleted.	The reason the notification booklet gives is “to maintain village character.” An 11-metre-high building will not affect “village character” in any way. Mapua is an area well suited for medium-density housing so the council should not limit it in this area more than other areas.	Provision 17.1A.3.2 (l) (ii) states that the maximum height of a building in the Mapua Development Area or an area subject to a Mapua Outline Spatial Plan is 8 metres, rather than the 11 metres permitted elsewhere. Provision 17.1A.3.2 (l) (ii) should be deleted.

Michael and Kimberly Nelson

Submitter 5

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS5.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support the rezoning of T-226 Papakainga Zone.	To enable papakāinga development and support the ability of whānau to live on ancestral land.	We support the rezoning of T-226 to enable papakāinga development and support the ability of whānau to live on ancestral land.
OS5.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Retain Redmill Road as a cul-de-sac, provide any desired connectivity by way of a walking and cycling path rather than a public road, required a full site-specific assessment before any future vehicle connection is considered, and investigate a direct Stringer Road-La Mer View Road connection as the more appropriate transport solution (which we would whole-heartedly support).	Multiple reasons as summarised below. A vehicle connection through Redmill Road would adversely affect the area's rural-residential character, safety and amenity, has not been adequately assessed, and is not required to support the proposed papakāinga development. A direct Stringer Road-La Mer View connection, combined with walking and cycling links, would provide a more suitable and efficient transport solution while avoiding impacts on existing residents. For more detail, please see the full submission document.	We oppose any part of the proposal that a vehicular through-road between Stringer Road and Redmill Road should form part of that development.
OS5.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.14 Papakainga development	Amend	a. Identify a cul-de-sac together with a dedicated walking/cycling path as the preferred form of access and connectivity. b. Require any vehicle connection between Stringer Road and Redmill Road to undergo a site-specific assessment of: • Transport • Safety • Amenity • Rural character • Registered consent-notice controls (Consent Notice 11141705.5) • Stormwater effects • Construction effects on existing Redmill Road properties		Amend provisions applying to the Papakāinga Zone at T-226

			c. Ensure Plan Change 81 and supporting documents do not provide for, rely upon, or presume a Stringer Road–Redmill Road vehicle connection as an expected outcome of rezoning or subdivision. d. Record Council support for investigating: • A direct Stringer Road–La Mer View connection, and • A walking/cycling path link to Redmill Road as the preferred means of meeting connectivity and intersection-safety objectives.		

Alex Hannant and Jody Connor

Submitter 6

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS6.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.2 Objectives	Support	confirm rezoning	We do not oppose papakāinga development on ancestral land	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2.
OS6.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	confirm papakainga zone		5.1 The rezoning of T-226 to the Papakāinga Zone. We support, without qualifi cation, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome.
OS6.3	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Remove indicative road If connectivity required then a walking and cycling path Alternatively a connection to Le Mer View	6.1 Adverse eff ects on the existing community and environment - A through-connection would convert Redmill Road from a quiet no-exit road into a through-route – a potential “rat run” for properties on upper Redvale Road and the new development on La Mer View Road for traffi c coming and going from the westerly direction. It would introduce adverse traffi c, noise and safety eff ects on approximately 20 existing households for no benefi t the network does not already have – a poor and inequitable distribution of eff ects. - Redmill Road is not formed or designed to carry through-traffi c. It has private driveways, and is used informally by residents, children and pets for walking and leisure. Introducing through-traffi c creates a real and unnecessary safety risk. - The change would erode the established rural-residential amenity and character of the area – directly relevant under RMA sections 7(c) and 7(f). 6.2 Inconsistency with the Council’s own consent notice and objectives - The character of the Galeo Estate is not a private preference. It was imposed and registered by the Tasman District Council itself, through Consent Notice 11141705.5 (issued under section 221 of the RMA as a	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffi c for this area – duplicating a connection the highway already provides. Its only practical eff ect would be to divert traffi c off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefi t to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefi t claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection (section 7). 5.2 The legitimate road-safety concern at the Maisey Road / State Highway 60 intersection. We accept this is a genuine issue worth addressing – and section 7 explains how it can be addressed more eff ectively than by the proposed connection.

				condition of subdivision consent RM 080969). That consent notice requires, among other things: outdoor lighting restricted to hooded or shrouded fi ttings directing light downwards and mounted no higher than 900 mm – a dark-sky regime (cl f); no fencing on any lot except low post-and-wire or visually-permeable safety fencing (cl g); landscape-integrated buildings in recessive colours (cls b–c); stormwater managed by gravity to natural gullies, with permeable surfaces and reduced runoff (cl k); and no further subdivision of the lots (cl m). - A lit, kerbed, signed vehicular through-road – with headlight sweep at night, traffi c signage, and a large sealed surface shedding concentrated stormwater – is fundamentally inconsistent with the dark, open, low-light, landscape-led, low-density environment the Council itself required and registered against these titles. The Council cannot coherently require residents to mount lights below 900 mm and forgo fences “to protect amenity”, while routing a lit connector road through the same community. - The Council's own reserve planning treats Redmill Road as a walking environment: the Moutere-Waimea Ward Reserve Management Plan establishes a Redmill Road Walkway Reserve (Map 21). Routing diverted through-traffi c onto Redmill Road is fundamentally at odds with the pedestrian and recreational use the Council itself has designated here. - The connection is also inconsistent with Plan Change 81’s own amended objective 11.1.2 (a fully integrated, multi-modal transport system). It serves private vehicles, not active modes, and degrades a currently safe and walkable local road. 6.3 Section 32 and value for money - A new sealed connector road of this kind – requiring earthworks on steep topography and, in all likelihood, land acquisition – would be signifi cant expenditure for a connection that, as set out above, adds nothing the network does not already have. It is not the most appropriate method to achieve the relevant objectives (RMA section 32). The Council's section 32 alternatives evaluation assessed zoning options only; it did not evaluate alternative road alignments, so the connection has not been tested against the “most appropriate method / reasonably practicable options” standard. - The Council’s own evaluation records that T-226 performs poorly against the wider growth strategy and is supported on cultural grounds. Signifi cant roading investment to integrate this site into the wider network is therefore not strategy-driven, and is poor value for money at a time of acknowledged budget constraint – particularly where existing local infrastructure, including the area's own walking network, is itself under-maintained. - The Infrastructure Report classifies the site as infrastructure-neutral, with developer-led onsite servicing and “no reticulated network delivery dependency”. There is accordingly no servicing need that requires this road.	

Joe and Moira Johns

Submitter 7

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS7.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support rezoning	We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2.	We **support** the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone.
OS7.3	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Remove indicative road If connectivity required then a walking and cycling path Alternatively a connection to Le Mer View	6.1 Adverse eff ects on the existing community and environment - A through-connection would convert Redmill Road from a quiet no-exit road into a through-route – a potential “rat run” for properties on upper Redvale Road and the new development on La Mer View Road for traffi c coming and going from the westerly direction. It would introduce adverse traffi c, noise and safety eff ects on approximately 20 existing households for no benefi t the network does not already have – a poor and inequitable distribution of eff ects. - Redmill Road is not formed or designed to carry through-traffi c. It has private driveways, and is used informally by residents, children and pets for walking and leisure. Introducing through-traffi c creates a real and unnecessary safety risk. - The change would erode the established rural-residential amenity and character of the area – directly relevant under RMA sections 7(c) and 7(f). 6.2 Inconsistency with the Council’s own consent notice and objectives - The character of the Galeo Estate is not a private preference. It was imposed and registered by the Tasman District Council itself, through Consent Notice 11141705.5 (issued under section 221 of the RMA as a condition of subdivision consent RM 080969). That consent notice requires, among other things: outdoor lighting restricted to hooded or shrouded fi ttings directing light downwards and mounted no higher than 900 mm – a dark-sky regime (cl f); no fencing on any lot except low post-and-wire or visually-permeable safety fencing (cl g); landscape-integrated buildings in recessive colours (cls b–c); stormwater managed by gravity to natural gullies, with permeable surfaces and reduced runoff (cl k); and no further subdivision of the lots (cl m). - A lit, kerbed, signed vehicular through-road – with headlight sweep at night, traffi c signage, and a large sealed surface shedding concentrated stormwater – is fundamentally inconsistent with the dark, open, low-light, landscape-led, low-density environment the Council itself required and registered against these titles. The Council cannot coherently require residents to mount lights below 900 mm and forgo fences “to protect amenity”, while routing a lit connector road through the same community. - The Council's own reserve planning treats Redmill Road as a walking environment: the Moutere-Waimea Ward Reserve Management Plan establishes a Redmill Road Walkway Reserve (Map 21). Routing diverted through-traffi c onto Redmill Road is fundamentally at odds with the pedestrian and recreational use the Council itself has designated here. - The connection is also inconsistent with Plan Change 81’s own amended objective 11.1.2 (a fully integrated, multi-modal transport system). It serves private vehicles, not active modes, and degrades a currently safe and walkable local road. 6.3 Section 32 and value for money - A new sealed connector road of this kind – requiring earthworks on steep topography and, in all likelihood, land acquisition – would be signifi cant expenditure for a connection that, as set out above, adds nothing the network does not already have. It is not the most appropriate method to achieve the relevant objectives (RMA section 32). The Council's section 32 alternatives evaluation assessed zoning options only; it did not evaluate alternative road alignments, so the connection has not been tested against the “most appropriate method / reasonably practicable options” standard. - The Council’s own evaluation records that T-226 performs poorly against the wider growth strategy and is supported on cultural grounds. Signifi cant roading investment to integrate this site into the wider network is therefore not strategy-driven, and is poor value for money at a time of acknowledged budget constraint – particularly where existing local infrastructure, including the area's own walking network, is itself under-maintained. - The Infrastructure Report classifies the site as infrastructure-neutral, with developer-led onsite servicing and “no reticulated network delivery dependency”. There is accordingly no servicing need that requires this road.	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffi c for this area – duplicating a connection the highway already provides. Its only practical eff ect would be to divert traffi c off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefi t to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefi t claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection (section 7).

Terence Lomax

Submitter 8

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS8.1	Proposed Plan Change No. 81 > Maps > Area Maps > 11 - Proposed PC81 - Area - Motueka, McBrydie Rd	Amend	Seeks that the road over to McBridie Road is adopted as part of the proposed change. The road over to McBridie Road is a really good idea, but needs to be wide enough to allow for emergency vehicular access at speed. Refer to original submission for more information	Should the River flood to any greater extent than the June 2025 flood in the area south of Mytton Heights, or there be larger slips onto the road, there would be no current safe route out of the area. The road over to McBridie Road is a really good idea, but needs to be wide enough to allow for emergency vehicular access at speed.	Seeks that the road over to McBridie Road is adopted as part of the proposed change however concerned regarding safety and access width for emergency vehicles.
OS8.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 41 - Proposed PC81 - Zone - Motueka, McBrydie Rd	Amend	I want the Council to commit to bringing the Motueka Valley Road up to the current design specification with respect to road width, road verges, footpaths and suitable safe provision for cyclists.	The proposed change evidences the lack of safety of the Motueka Valley Highway, but does not actually propose to fix this issue, although it points to a possibility of a road to McBridie Road and a walking track. The traffic increase will arise more from the rural residential area than from the urban area. Refer to original submission for additional information.	I want the Council to commit to bringing the Motueka Valley Road up to the current design specification with respect to road width, road verges, footpaths and suitable safe provision for cyclists.
OS8.3	Proposed Plan Change No. 81 > Maps > Area Maps > 11 - Proposed PC81 - Area - Motueka, McBrydie Rd	Support	In support of the proposal to create a walking trail adjacent to Mytton Heights.	The submitter refers to the lack of safe areas to walk dogs off lead. Refer to original submission for more information.	In support of the proposal to create a walking trail adjacent to Mytton Heights.
OS8.4	2-Out of Scope	Amend	I note that when a council creates or reviews its Dog Control Policy, the Act requires them to have regard to "the exercise and recreational needs of dogs and their owners". Providing designated off-leash areas is the primary legal mechanism councils use to fulfil this specific requirement. Tasman District Council largely fails to comply with the Dog Control Act in this regard for the Motueka ward.	It is NOT SAFE to walk dogs along the Motueka Valley Highway because of a lack of a walkable verge in many places, the road being under the Councl regulations for design width, and there is no dedicated suitable fenced off-leash dog exercise area in the Motueka Ward that provides for exercising active dogs "at large" as envisaged by the Dog Control Act.	There is no dedicated suitable fenced off-leash dog exercise area in the Motueka Ward that provides for exercising active dogs "at large" as envisaged by the Dog Control Act.
OS8.5	2-Out of Scope	Amend	The Council could address early the required entry to the proposed walking track at Mytton Heights with an accessible off-road area on the vacant lot next to 319 Motueka Valley Highway, so that locals could safely park vehicles and discharge multiple dogs safely, (and obtain walking access via an early agreement with landowner).	This could permit the Council to investigate whether a walking track in the area was feasible, safe, and where it might be located so as to be actually useful.	Investigate the required entry to the proposed walking track at Mytton Heights with an accessible off-road area on the vacant lot next to 319 Motueka Valley Highway, so that locals could safely park vehicles and discharge multiple dogs safely.

Robin Palmer and Paul Winspear

Submitter 9

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS9.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd	Oppose	Oppose Medium Density Residential Zone	Several points which have been summarised below, see original submission for full detail. Further loss of highly productive land to residential use. Natural Hazards, specifically flooding to which the town and surrounding areas are very prone and which at some stage will require discussions involving managed retreat to higher ground. Address the housing shortage in Tākaka by tackling the amount of Holiday Homes in the area which are 2nd and 3rd homes and often vacant. Council could if willing, address with differential rating or other disincentives to owning empty houses.	Oppose rezoning of site T-138a (Delete Rural 1 zone, add Medium Density Residential Zone) for reasons relating to loss of highly productive land, natural hazards and addressing the housing shortage by looking into the issue of Holiday Homes in the area.

Martin Bird

Submitter 10

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS10.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Prohibit any roading connection between T-226 and Galeo Estate / Redmill Road. Require all access for T-226 to be provided via Stringer Road.	Galeo Estate roads are designed as local access cul-de-sacs with narrow carriageways, tight curves, limited shoulders, and constrained sightlines. Introducing through-traffic would significantly increase volumes, reduce safety, and undermine the intended residential character. Stringer Road is better suited to accommodate development traffic.	Prohibit any roading connection between T-226 and Galeo Estate / Redmill Road. They consider Galeo Estate a low-volume cul-de-sac network not designed for through-traffic. T-226 could generate 70–160 vehicle movements per day, creating inappropriate traffic loading. The submitter states that Stringer Road is the appropriate and logical access point for T-226, being a rural connector capable of upgrade.
OS10.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Amend	Require all access for T-226 to be provided via Stringer Road. Require a full Traffic Impact Assessment (TIA) for T-226 at the subdivision stage, including: • SH60 traffic growth modelling • Maisey Road intersection performance	Connecting T-226 to Galeo Estate would create significant safety, amenity, lighting, and network issues and would be inconsistent with the road hierarchy and long-term transport planning for the district. Refer to submission for more information.	I have concerns about the transport, safety, and residential amenity impacts arising from the proposed development area T-226 Stringer Road under Plan Change 81.

			• Safety analysis of turning movements • Road hierarchy compliance • Residential amenity impacts, including headlight strike. Protect the cul-de-sac character and amenity of Galeo Estate. Ensure no through-traffic function is imposed on Redmill Road.		
OS10.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Oppose	Require a full Traffic Impact Assessment (TIA) at subdivision stage, including SH60 modelling and intersection performance.	Additional traffic from T-226 (if routed via Galeo Estate → Maisey Road) would increase queueing, delay, and crash risk at an intersection not designed to absorb new development traffic. The scale of development and the sensitivity of the surrounding road network require detailed assessment to ensure safe and appropriate access and to avoid adverse effects on Galeo Estate and SH60.	The submitter requests a comprehensive TIA covering SH60 traffic growth, Maisey Road intersection performance, safety analysis, road hierarchy compliance, and amenity impacts.

Stephanie Bryant

Submitter 11

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS11.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 40 - Proposed PC81 - Zone - Motueka, Cnr Motueka Valley Hwy - College St	Support	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater.	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater. What we need in Motueka is a total new sewage system. Refer to original submission.	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater.
OS11.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 38 - Proposed PC81 - Zone - Motueka Central	Amend	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater.	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater. What we need in Motueka is a total new sewage system. Refer to original submission. Also provided a You Tube video on a floating dairy farm. Rotterdam Built a Dairy Farm That Floats	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater.
OS11.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 39 - Proposed PC81 - Zone - Motueka, Cnr Atkins St - Pa St	Support	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater.	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater. What we need in Motueka is a total new sewage system.	Supports in part, housing development in Motueka but it is dependent on sufficient infrastructure particularly wastewater.

				Refer to original submission.	

Diane and Lindsay Toole

Submitter 12

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS12.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose		Several reasons as summarised below, for more detail please see full submission. Destruction of "village feel", increased traffic, lack of parking, concerns of already full school and medical centre.	Our main objection is that there will be a systematic destruction of the “village feel” of Mapua and it will become a town instead.

Mary Bolland

Submitter 13

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS13.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 48 - Proposed PC81 - Zone - Richmond, Champion Rd	Oppose		To protect the neighbouring houses sunlight	That the zone indicated not to be used as double story housing blocks, to protect the neighbouring houses sunlight. No two-story building is to be built on the opposite side of 1 Forget-me-not Lane.
OS13.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose		That already a house on the section opposite me, shades the afternoon sun on my place even though there is a road in between.	That to protect the houses sunlight that no two storied building is to be built on the opposite side of 1 forget-me-not lane.

Caroline Butler

Submitter 14

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS14.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Oppose	I want the council to keep this land in its current rural zoning and remove this area from the proposed urban growth zone. I ask tasman district council to reconsider the parts of plan change 81 that allow urban development on productive land.	Multiple reasons as summarised below, for more detail see full submission. Permanent loss of productive land, more traffic, pressure on roads, wastewater and stormwater systems, increased cost for payers where the rates are already unaffordable, loss of rural character, open space and will devalue and ruin Hopes rural feel.	I oppose urban development on productive land around Richmond South and Hope. I support more housing but believe growth should first be directed into existing urban areas and less productive land.

				Future growth should focus first on existing urban areas, less productive land and places where roads and services are already available. New development should not proceed until the necessary infrastructure is funded and ready.	

Peter Rodgers

Submitter 15

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS15.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Amend	I respectfully request that the Council: • Carefully assess whether increased residential density is appropriate in this location. • Require comprehensive traffic and parking assessments before any rezoning proceeds. • Ensure that necessary infrastructure upgrades are completed before additional development occurs. • Consider the cumulative effects of multiple future redevelopments within Dorset Street when assessing the appropriateness of increased residential density. • Reconsider or modify the proposed rezoning if these matters cannot be adequately addressed.	Dorset Street already experiences high traffic volumes for what is essentially a narrow residential street. Although technically a two-way road, the volume of parked vehicles frequently reduces it to a single lane, requiring vehicles travelling in opposite directions to stop and give way. The street serves several important community facilities, including: • Richmond Primary School • A church • A community hall • A large number of elderly residents. Many elderly residents receive regular visits from home support workers, district nurses and other caregivers who depend on being able to park close to the homes they visit. Parking is already under considerable pressure, particularly during school drop-off and pick-up times, church services and community events. Increased residential density will inevitably place additional demand on parking and traffic movements, reducing safety and making access more difficult for residents, visitors, caregivers and emergency services.	Supports in part, I believe development should occur only where the existing transport infrastructure systems are capable of supporting it without adversely affecting the safety, amenity and wellbeing of residents.
OS15.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Amend	I respectfully request that the Council: Carefully assess whether increased residential density is appropriate in this location. Require comprehensive stormwater assessments before any rezoning proceeds. Ensure that necessary infrastructure upgrades are completed before additional development occurs. Consider the cumulative effects of multiple future redevelopments within Dorset Street when assessing the appropriateness of increased residential density. Reconsider or modify the proposed rezoning	4. Existing Stormwater Problems Stormwater has been a long-standing problem in this part of Dorset Street. During periods of heavy rainfall, stormwater already flows from properties further uphill, through our property and into our basement before continuing through neighbouring properties downhill. This has been an ongoing issue for decades and has never been adequately resolved. Increasing residential density generally results in more roofs, driveways and hard surfaces, reducing the amount of land able to absorb rainfall. Unless significant stormwater improvements are undertaken first, I am concerned that further development will worsen an already serious drainage problem.	Supports in part, I believe development should occur only where the existing wastewater and stormwater infrastructure systems are capable of supporting it without adversely affecting the safety, amenity and wellbeing of residents.

			if these matters cannot be adequately addressed.		
OS15.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	I respectfully request that the Council: Carefully assess whether increased residential density is appropriate in this location. Ensure future development includes appropriate setbacks, building heights and design controls to protect neighbouring properties from unacceptable loss of sunlight and privacy. Consider the cumulative effects of multiple future redevelopments within Dorset Street when assessing the appropriateness of increased residential density. Reconsider or modify the proposed rezoning if these matters cannot be adequately addressed.	Loss of Sunlight and Privacy Our dwelling is located approximately 1.5 metres from the adjoining boundary. Should the neighbouring property be redeveloped for medium-density housing, there is a significant risk that our home would experience: Loss of natural sunlight. Increased overshadowing of our home and outdoor living areas. Reduced privacy from overlooking upper-storey windows. A noticeable reduction in the enjoyment and amenity of our property. These effects would have a significant impact on our quality of life and should be carefully considered.	Supports in part, that the loss of natural sunlight, increased overshadowing of our home and outdoor living areas, reduced privacy from overlooking upper-story windows, and the reduction in the enjoyment and amenity of our property are all factors that should be carefully considered.

Simon Mannering

Submitter 16

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS16.1	Proposed Plan Change No. 81	Support	I fully support the councils proposal and strongly agree on the need to open up more land for further residential development especially in the Mapua area.	I'm the owner of 125 Seaton Valley Rd, Mapua, which falls in the rezoning of existing properties for further development in plan change 81. I fully support the councils proposal and strongly agree on the need to open up more land for further residential development especially in the Mapua area.	Supports the councils proposal and strongly agree on the need to open up more land for further residential development especially in the Mapua area.

Vicki Davenhill

Submitter 17

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS17.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects >	Oppose	Oppose the proposed plan change 81, that would permit increased residential intensification, including multi-storey developments and higher-density housing	The proposed changes have the potential to significantly and permanently diminish the residential amenity values that attracted my family and me to this community. Specifically, loss of privacy, loss of sunlight	Opposes proposed plan change 81, that would permit increased residential intensification due to reasons including loss of privacy, loss of sunlight and outlook, erosion of neighbourhood character, impact on

	6.4A Land for Residential Activities		on smaller sites within my neighbourhood.	and outlook, erosion of neighbourhood character, impact on property values and investment expectations, pressure on local infrastructure, lack of appropriate transition and community protection. Refer to original submission for more information.	property values and investment expectations, pressure on local infrastructure, lack of appropriate transition and community protection.

Nathan and Nicky Anderson

Submitter 19

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS19.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 34 - Proposed PC81 - Zone - Mapua, Higgs Rd	Amend	What we would like is that any development that takes place here could retain the pond and drainage features to an extent. With weather events becoming a common occurrences, we worry that once again the water would have nowhere to go and flooding will occur again.	Property T- 237b on the plan This Property has a natural spring fed pond on it, with a small drainage/stream ditch running towards it from the east of the property. This has always controlled the water. Unfortunately when Jessie street was developed, their storm water ran into the drain/stream. The pond was unable to handle the water and the houses beside the property along Aranui Road started flooding. The then property owner dug a drainage system from the pond towards Aranui Road and a pipe was placed under the road. This stopped the flooding. Please find attached photos of pond and drainage.	What we would like is that any development that takes place here (T-237b) could retain the pond and drainage features to an extent.

Juergen and Louise Sparrer

Submitter 20

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS20.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in the proposed rezoning.	We support, without qualification, the ability of whānau to live on their ancestral land. Nothing in this submission should be read as opposing that outcome.	We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in the proposed rezoning.

OS20.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	We ask the Council to keep Redmill Road as a cul-de-sac, to require a full site-specific assessment of effects before any vehicle connection to Redmill Road could be relied upon, and to support instead a direct Stringer Road–La Mer View connection. Refer to original submission for more information.	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffic for this area – duplicating a connection the highway already provides. Its only practical effect would be to divert traffic off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefit to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefit claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection. Refer to the original submission for more information.	Oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision and oppose any proposal that would see additional vehicular traffic at the Maisey Road / State Highway 60 intersection, particularly given the current housing development on the lower part of Maisey Road which will increase traffic at this turn out.

Peter and Marilyn Connolly

Submitter 21

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS21.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Oppose Plan Change 81.	That increased residential density will put greater pressure on infrastructure. Increased traffic movements and parking demand. Refer to original submission for more information.	Oppose Proposed Plan Change 81 because it prioritises increased residential density without adequately addressing the significant adverse effects on established neighbourhoods with inadequate infrastructure.
OS21.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Oppose Plan Change 81	Potential adverse effect include: • loss of privacy through increased overlooking • increased shading and reduced access to sunlight Good planning requires balancing the need for growth with the protection of the amenity by existing residents. That balance should ensure that redevelopment is compatible with the surrounding environment rather than creating developments that are significantly out of scale. Refer to original submission for more information.	Oppose Proposed Plan Change 81 because it prioritises increased residential density without adequately addressing the significant adverse effects on established neighbourhoods including loss of privacy and sunlight. And will fundamentally change the character and amenity of the area and create adverse effects for surrounding residents

Rebecca Parmentier

Submitter 22

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS22.1	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Amend	Completely delete the 'Indicative Walkway overlay' from the planning maps where it interfaces with, terminates at, or relies upon the private driveway entrance and/ or boundaries of 25, 29 and 33 Katania Heights. A walkway would be better positioned along the dam, linking in with the back of the existing Katania Heights Development, where there is no reliance on private property.	• Dangerous conflict with Private Driveway Access - In conflict with policy 6.1.3.1 (e). The proposed walkway overlay funnels public pedestrian, cyclist, and scooter traffic directly onto a severe blind crest/ corner on a private driveway, immediately adjacent to the access point for both 29 and 33 Katania Heights. This creates an unacceptable safety risk for residents using the driveway and the public. The previous property owners of our address had their dog hit by a car on this corner/ crest, as there is no visibility. Furthermore, any foot traffic trespassing though our properties to reach Katania Heights, would have to cross Katania Heights on the blind crest of the hill (also a blind corner) to reach the footpath on the other side. This poses an unacceptable risk for the public and residents of the wider existing Katania Heights development using the road. • Infrastructure Security Risk: The current walkway trajectory encourages and directs unmonitored public foot traffic directly toward a private driveway, where the local Brightwater water supply and infrastructure tanks are located. Encouraging public access to a restricted council utility site presents a health and safety risk. The heights on the western side of the tanks are in excess of 3-5m, although these sides are fenced, it is very easy to go around, and I have witnessed people on the outer side of the fence on multiple occasions. Directing unmonitored public foot traffic is also a potential biosecurity hazard to Brightwater's drinking water network. • Failure of Urban Design Connectivity: Appendix 2: Site Assessment Report for Plan Change 81 quotes the following with respect to the proposed walkway *"A new indicative walkway is proposed connecting T-104a with the Katania Heights development."* This statement is incorrect, as a walkway that terminates on a private driveway (surrounded by private land) is not promoting connectivity. It fails to achieve the Councils broader urban design goal of creating a safe, logical, integrated and well-connected public network. It effectively creates a dead end on private land, which will lead to public confusion and unintended trespassing. It is not well-functioning and is in conflict with objective 6.1.2.1 and policy 6.3.3.5A. • Security and Amenity. Forcing a public through-route onto a private residential driveway compromises the residential security, privacy, and quiet enjoyment of us as the lawful occupiers. Our house specifically (which is located directly opposite the proposed walkway connection point) is setback ~one metre from the boundary and slightly more from the driveway on the south-eastern boundary. The house has been designed to be situated on a private (not public)	**Submitters seek to completely delete the 'Indicative Walkway overlay' where it meets private driveways at 25, 29, and 33 Katania Heights.** They argue it poses serious safety risks due to blind corners, threatens water infrastructure security, and compromises residential privacy and security. The walkway fails urban design goals, creates legal and consultation concerns, and is redundant as existing paths suffice. They propose relocating the walkway along the dam away from private property.

				driveway. There is no way to practically fence this boundary and prevent foot traffic from walking on our property. This boundary is where our children's bedrooms are situated and it would be a security/ safety risk for us to have windows open, knowing that the public could be walking by at any time of the day or night. There would also be limited ways to visually screen our children's bedrooms/ garage from the publics view, without further adding to the safety and visibility risk (outlined in item (a) above). • Lack of transparent consultation: The only notification about this 'Indicative walkway' has been the standard email to property owners adjacent to the Plan Change 81 area. This doesn't feel to be fair and transparent process, particularly for the owners and users of the private driveway. A private driveway is privately funded, maintained, and owned infrastructure. Directing public pedestrian traffic into a private driveway creates significant legal ambiguity regarding public access rights and civil liability. At the very least, we feel us as users (the owners of the driveway more critically) should have consulted with more directly and transparently given the implications. • Redundancy and surplus to requirements: The proposed indicative walkway is redundant in terms of connectivity. As already pointed out, it is a dead end unless the public using it trespass in order to reach the existing Katania Heights development, otherwise it's a dead end. As residents of the private driveway, we use the existing walkway adjacent to Katania Heights to access the underpass. Presumably any residents in development area T104a/ T104b would also walk directly through these subsequent development areas to the underpass rather than come up and over the hill and back down. Therefore, the walkway is redundant.	
OS22.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Oppose	• Remove the Brightwater Development Area overlay within T104a and T104b and leave as a lower-density classification (such as standard Residential) to provide an appropriate density transition from the existing Katania Heights Development and between housing and the adjacent rural boundary. Instead focus intensification efforts strictly within the flat, established core of the Brightwater town centre. • Enforce strict geotechnical setbacks and overlay protections that completely restrict intensive development from occurring on or directly beneath the steep hillsides / erosion scarp in the western portion of T104-a, until comprehensive slope stability is completed.	• Geotechnical and Natural Hazard Risks: Erosion and Land Instability Hazards: The proposed Brightwater T104a development zone contains a steeply sloping hillside/ erosion scarp. The developable land in Brightwater T104a is below this slope. Increasing housing density, impervious concrete surfaces, and stormwater runoff at the base of a potentially unstable slope is short-sighted planning. It elevates the risks of landslips, soil erosion, and property damage, failing to safely account for local natural hazards. PC 81 Appendix 24 only mentions that T-104b is a sufficient distance away from the hillslope to prevent slope instability hazards, but there is no mention of the eastern portion of T104a. The potential mitigation measures outlined in the Natural Hazards risk assessment include sensible layout and setback from slopes (along with geotechnical assessments). Though with the position of the proposed road, buffering to addresses reverse sensitivity from adjacent rural	Submitters oppose the Brightwater Development Area overlay in T104a and T104b. They seek removal of the overlay to maintain lower-density zoning for smooth transition from Katania Heights to rural land. Concerns include geotechnical risks from steep slopes, inadequate setbacks, and increased landslip hazards. They argue high-density housing on rural edges harms amenity, urban design, and

				land, and the location of the steep slopes, it's difficult to see how a setback in conjunction with development within the T-104a area can be realistically accommodated, as the residual area would be small. • Failure to maintain existing Amenity Values (Section 7(c) of the Resource Management Act and not in alignment with objective 5.2.2 *("Maintenance and enhancement of amenity values on site and within communities throughout the District..."):* An abrupt density transition from approximately 8 dwellings/ha in the existing Katania Heights subdivision (based on a total area of ~10ha, including roading) to up to 20-30 dwellings/ha in T-104a and T-104b (situated on the outer fringe of the area), fails to maintain or enhance the amenity values of the existing, established Katania Heights community. Given the small developable area in T-104a noted in item (a) above, there will be limited opportunity to generate graduated density steps, to transition smoothly between low to high density and contrasting building typologies. It is also not in character, locating higher density housing on the outskirts rather than interior of a residential area. • Inappropriate Zoning Intensity on the Rural Fringe/ Poor Urban Design Integration: Placing high-intensity housing directly adjacent to productive rural boundaries creates a zoning clash. This abrupt transition compromises the existing rural-residential character and introduces unnecessary reverse sensitivity issues e.g., noise, herbicide application adjacent vineyards, privacy, and visual dominance. Intensive urban development is fundamentally better positioned within the flat, existing Brightwater town centre and urban core. Concentrating higher densities near existing commercial amenities, public transport routes, and central infrastructure aligns with sound planning principles, whereas placing it on the rural fringe increases car dependency and infrastructure inefficiencies.	creates reverse sensitivity issues. They prefer intensification focused in Brightwater's flat town centre for better infrastructure use and planning outcomes.

Tamsin Clark

Submitter 23

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS23.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	No double storeyed dwellings. Remove medium density and change to bigger sections to keep the rural outlook.	Single story dwelling only. Not seen from existing established properties and well away from existing property fence lines.	Submitters oppose the proposal. They seek to ban double-storey dwellings.

					They want medium density removed and larger sections instead. Their goal is to maintain the rural outlook. They prefer single-story homes only. Houses should not be visible from existing properties. Dwellings should be set well away from property fences.
OS23.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Oppose	Bigger sections to maintain the rural feel and special character of the area. No double storeyed dwellings and rooflines. below the hill line. No houses built directly along he fenceline or trees on the ridge that will affect our solar panels.	This plan affects us immensly with our quality of life and our serene surroundings. Our property faces north with the situation of the house, our deck and our privacy will be affected. Please see document attached. Our property value will be affected! The wind funnels up the valley onto our property so what are the mitigation factors for dust?	The submitter opposes the proposal and seeks larger sections to preserve the rural feel and character. They request no double-storey homes or rooflines above the hill line. Homes should not be built on fence lines or ridges to protect solar access. Concerns include impacts on privacy, quality of life, property value, and dust caused by wind funnels. Mitigation measures for dust are requested.
OS23.3	2-Out of Scope	Oppose	Leave it alone.	Leave the water alone! This affects locals.	The submitter opposes the proposal. They want the current water conditions to remain unchanged. Their main concern is the impact on local communities.
OS23.4	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Oppose	Maintain wide open spaces with minimum lighting, noise and signage.	No thought put into existing rural sites living directly along the fence line. Remove all wording with the with, "... may decline with ..."	Submitters oppose the proposal. They seek to maintain wide open spaces with minimal lighting, noise, and signage.

					Concerns focus on the lack of consideration for rural residents living near the site boundary. They request removal of any wording suggesting that applications "... may decline with ...".

Peter Geddes

Submitter 24

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS24.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2.	The rezoning of T-226 to the Papakāinga Zone. We support, without qualification, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome.	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2.
OS24.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	In summary, we ask the Council to keep Redmill Road as a cul-de-sac, to provide any connectivity to the new development as a walking/cycling path rather than a road, to require a full site-specific assessment of effects before any vehicle connection to Redmill Road could be relied upon, and to support instead a direct Stringer Road–La Mer View connection. Refer to information in the original submission including proposed alternative solution.	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffic for this area – duplicating a connection the highway already provides. Its only practical effect would be to divert traffic off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefit to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefit claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection (section 7). Refer to original submission for more information and a proposed alternative route.	We oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision.
OS24.3	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	Support Objectives 10A.2.1 and 10A.2.2	The rezoning of T-226 to the Papakāinga Zone. We support, without qualification, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome.	Genuine support for papakāinga and the principles of Te Tiriti o Waitangi (RMA sections 6(e), 7(a) and 8; objectives 10A.2.1 and 10A.2.2).

Network Tasman Limited

Submitter 25

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS25.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Retain the proposed Rural 1 deferred Light Industrial Zone.	Network Tasman Limited (NTL) supports the proposed Rural 1 deferred Light Industrial Zone as shown on Zone Map 80-53. This is because much of the site is already developed for light industrial activities in accordance with Schedule 17.5A. This support extends to the proposed Rural 1 deferred Light Industrial Zone to the south-west of Schedule 17.5A, being that land contained within T-35a as shown on Map 80-53.	Supports Rural 1 deferred Light Industrial Zone (T-35a)
OS25.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Retain Schedule 17.5A as shown on Zone Map 80-53.	While the proposed Rural 1 deferred Light Industrial Zone is supported, Zone Map 80-53 also shows Schedule 17.5A. Retaining Schedule 17.5A is critical and so also supported.	Retain schedule 17.5A as shown on map 53.
OS25.3	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	1. Delete the section of Indicative Road within Schedule 17.5A located east, and immediately west, of Reed Andrews Drain. 2. Amend the section of Indicative Road within Lot 1 DP 20183 (52 Main Road Hope) to show an intersection with Main Road Hope.	Area Map 80-24 proposes a new Indicative Road within T-35a. This Indicative Road extends south-west from the end of Normal Andrews Place, through the NTL site before connecting again with the Main Road Hope opposite White Road. The alignment is, for some reason, irregular. This proposed section of Indicative Road immediately west and north-east of the Reed Andrews Drain is opposed (shaded in yellow below), while the section of proposed Indicative Road within Lot 1 DP 20183 (52 Main Road Hope) should be redrawn to show an intersection fronting Main Road Hope (also shown diagrammatically below). A more accurate drawing can also be provided. This change is required as the new stormwater upgrade required through Lot 1 DP 20183 will involve the removal of the existing bridge, and so sever the NTL land to the north-east of the drain from the balance of T-35a to the south-west. In addition, the proposed Indicative Road passes through the existing electricity substation at the northern end of Schedule 17.5A, with that substation planned to be upgraded in the near future. Refer to original submission for further information including diagram showing amendments.	Oppose in part. Amend indicative road so that it coincides with the image below. .
OS25.4	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Retain indicative walkway.	PC81 also proposes an indicate walkway which is intended to provide for a linkage between Richmond South (south of Main Road Hope) to the Railway Reserve and a future linkage to (and from Richmond West). This walkway linkage is supported as it would serve to provide for alternative modes of transport to and from Schedule 17.5A. The final alignment of this	Support indicative walkway that provides a linkage between Richmond South (south of Main Road Hope) to the Railway Reserve and a future linkage to (and from Richmond West).

				walkway/cycleway is being discussed with TDC as a part of the wider Reed Andrews Drain upgrade.	
OS25.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Support	Retain changes as proposed.	The proposed change to Objective 5.2.2 is considered to be appropriate, and will ensure that this objective is consistent with the NPS-UD	Support changes proposed.
OS25.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Amend policy to take account of the enabling provision for development in accordance with Schedule 17.5A.	In conjunction with Objective 6.3.2.3, this proposed new policy is an 'avoidance' policy that imposes a high hurdle for the development of deferred land until such time as all transport and servicing infrastructure is provided in accordance with the NTLDM. This approach does not adequately recognise that Schedule 17.5A contains a bespoke set of provisions that provide for further development as a controlled activity.	Oppose in Part. Policy that imposes a high hurdle for the development of deferred land until such time as all transport and servicing infrastructure is provided in accordance with the NTLDM. This approach does not adequately recognise that Schedule 17.5A contains a bespoke set of provisions that provide for further development as a controlled activity. Amend so that Schedule 17.5A is taken into account.
OS25.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond > 6.8.3 Policies	Amend	Amend Policy 6.8.3.10 to ensure the planned extension of the urban boundary along Main Road Hope is acknowledged as a part of urban growth. This should also include a new policy under the 'Industry' heading (following 6.8.3.23A), and with additional Explanation provided in 6.8.30 (addressed below).	This change to Policy 6.8.3.10 does not adequately address the proposed extension to the urban boundary by the provision for additional Light Industrial and Mixed Business land in Richmond South (Man Road Hope).	Support in part. Amend Policy 6.8.3.10 to acknowledge the planned extension of the urban boundary along Main Road Hope as a part of urban growth.
OS25.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond > 6.8.30 Principal Reasons and Explanation	Amend	Provide additional Explanation in 6.8.30 to acknowledge the additional Light Industrial and Mixed Business land in Richmond South	This change to Policy 6.8.30 does not adequately address the proposed extension to the urban boundary by the provision for additional Light Industrial and Mixed Business land in Richmond South (Main Road Hope).	Support in part. Provide additional Explanation in 6.8.30 to acknowledge the additional Light Industrial and Mixed Business land in Richmond South
OS25.9	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.4 Business and Industrial Zones > 16.3.4.1 Controlled Subdivision (Business and Industrial Zones)	Amend	Change the subheading to include Richmond South.	The subheading to this set of rules refers to Richmond West and Motueka, yet this change to rule (i) also relates to Main Road Hope (Richmond South).	Support in part. Amend 16.3.4.1(i) wording to include Main Road Hope (Richmond South).
OS25.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.20 Principal Reasons for Rules	Amend	Include updated principal reasons in 16.3.20.	No changes to the principal reasons in 16.3.20 are proposed to take account of the new Light Industrial and Mixed Business zones planned within Richmond South.	Support in part. Amend 16.3.20 so that it takes into account the new Light Industrial and Mixed Business zones planned within Richmond South.
OS25.11	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Include reference to 16.3D in criterion 4C.	This criterion should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are located.	Support in part. Include reference to 16.3D in criterion 4C, being where the Outline Spatial Plans are located.
OS25.12	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Include reference to 16.3D in criterion 42.	This criterion should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are located.	Support in part. Amend to include reference to 16.3D in criterion 42, being where the Outline Spatial Plans are located.
OS25.13	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.4 Industrial Zone Rules > 17.4.2 Land Use > 17.4.2.1 Permitted Activities (Land Use)	Oppose	Delete rule 17.4.2.1(oa).	This new rule entitled 'Vehicle Access (Main Road Hope)' has originated from Schedule 17.5A, with PC81 proposing to reimpose the same vehicle access limitations despite also proposing an Indicative Road, as a part of providing for safe and efficient land transport outcomes. Once the new	Oppose 17.4.2.1(oa), Schedule 17.5A to remain in place and delete 17.4.2.1(oa).

				intersection with Main Road Hope is formed at the front of No 52 Main Road Hope, with access to gained from that new road alignment, there should be no need for this rule. In the meantime, Schedule 17.5A needs to remain in place.	
OS25.14	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.2 Land Use > 17.5.2.3 Controlled Activities (Land Use) - Site Specific Activity (Hope Depot)	Oppose	Retain 17.5.2.3.	Removal of 17.5.2.3 would remove current operative opportunities available under Schedule 17.5A of the TRMP. This would not only impact negatively on the opportunity to develop vacant land within Schedule 17.5A,but also lead to inefficient outcomes when it comes to any changes to the existing legally established light industrial development. These impacts have not been assessed or addressed within the section 32 assessment supporting PC81 and do not result in the sustainable management of natural and physical resources.	Oppose deletion of 17.5.2.3, retain 17.5.2.3 instead.
OS25.15	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.3 Building Construction, Alteration, or Use > 17.5.3.1 Permitted Activities (Building Construction, Alteration, or Use)	Oppose	Retain 17.5.3.1(f)(iv).	This rule currently provides the necessary reference to Schedule 17.5A and so needs to be retained.	Oppose deletion of 17.5.3.1(f)(iv). Retain 17.5.3.1(f)(iv) instead.
OS25.16	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.3 Building Construction, Alteration, or Use > 17.5.3.1 Permitted Activities (Building Construction, Alteration, or Use)	Oppose	Retain reference to Schedule 17.5A in 17.5.3.1(h)(i).	This rule provides the necessary reference to Schedule 17.5A and so needs to be retained.	Retain reference to Schedule 17.5A in 17.5.3.1(h)(i).
OS25.17	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.3 Building Construction, Alteration, or Use > 17.5.3.1 Permitted Activities (Building Construction, Alteration, or Use)	Oppose	Retain exemption to Schedule 17.5A in 17.5.3.1(l).	The existing rule contains an exception to the building coverage rule for land within Schedule 17.5A. This exemption needs to be retained.	Retain exemption to Schedule 17.5A in 17.5.3.1(l).
OS25.18	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.20 Principal Reasons for Rules	Oppose	Retain the Principal Reasons associated with the Scheduled Network Tasman Site (17.5A).	The paragraphs explaining the function and purpose of Schedule 17.5A are proposed to be deleted by PC81. See page 353 of Appendix 2 (PC81). Until such time as the deferment is uplifted and the Light Industrial Zoning becomes available, this explanation is part of the planning framework that needs to be retained.	Retain the Principal Reasons associated with the Scheduled Network Tasman Site (17.5A).
OS25.19	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > Schedules > Schedule 17.5A: Activities on Network Tasman Ltd Site at Main Road, Hope	Oppose	Retain Schedule 17.5A.	PC81 proposes to delete Schedule 17.5A which would remove the currently opportunity to develop this land for the Light Industrial activities provided for as a controlled activity. The costs associated with removing this Schedule from the TRMP as a part of PC81 have not been addressed nor assessed in the Section 32 report supporting PC81, nor has the option of keeping this Schedule.	Retain Schedule 17.5A as deletion would remove the current opportunity to develop this land for the Light Industrial activities provided for as a controlled activity.

				As set out within 17.14.1 of PC81 (addressed below), the deferred zones are “used to enable the efficient and streamlined transition of undeveloped land with insufficient servicing to developable land”. This does not apply to the land within Schedule 17.5A which is predominantly developed with a range of Light Industrial Activities. The removal of Schedule 17.5A will not lead to a streamlined transition, but will lead to inefficient outcomes that are not necessary not appropriate	
OS25.20	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.14 Deferred Zone Rules	Amend	Amend 17.14.1 to acknowledge that Schedule 17.5A is largely developed and so those provisions will continue to apply / be retained until the deferment is uplifted.	17.14.1 of PC81 states: “Deferred zones are used to enable the efficient and streamlined transition of undeveloped land with insufficient servicing to developable land”. (emphasis added) This does not apply to the land within Schedule 17.5A which is predominantly developed with a range of Light Industrial Activities. The removal of Schedule 17.5A will not lead to a streamlined transition, but will lead to inefficient outcomes that are not necessary nor appropriate. Not all deferred zones are undeveloped, and this statement in 17.14.1 needs to be corrected to take account of Schedule 17.5A.	Oppose in part. Amend 17.14.1 to acknowledge that Schedule 17.5A is largely developed and so those provisions will continue to apply / be retained until the deferment is uplifted.
OS25.21	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Amend Schedule 17.14A so that the transport constraint in T-35a does not apply north-east from 68 Main Road Hope.	As set out above, Schedule 17.5A already has an appropriate standard of vehicle access, with a change currently being discussed with TDC as a part of enabling the upgrade of the Reed Andrews Drain. Schedule 17.14A identifies the following Transport constraint that is required before the deferment is uplifted and the Light Industrial zone becomes available: Transport White Road / SH6 intersection upgrade It is considered that this proposed intersection upgrade is not required for the land currently contained within Schedule 17.5A as there are two other existing accessways formed to SH6 that meet the appropriate standard. In addition, even if this intersection was upgraded as a part of sequential development at the southern end of T-35a, a practical roading connection may not be made for many years, thereby causing a significant delay to the uplift of the deferment even once water, wastewater and stormwater services are available. A full and complete connection / linkage is highly unlikely to occur in a short period of time. Further development on the northern side of T-35a (within Schedule 17.5A), with an appropriate standard of access to SH6, should be encouraged as a part of achieving the objectives of PC81.	Oppose in part. Amend Schedule 17.14A so that the transport constraint in T-35a does not apply north-east from 68 Main Road Hope.

Dave Baker

Submitter 26

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS26.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Oppose	Would like to see the area remain unchanged and stay as Rural 1 deferred Rural Residential.	Like many of the residents that own property on the Rural Residenal land that border area T-42a, we bought our property because we enjoyed the open space and reduced number of near neighbours that the section and surrounding area gave us. This is what we bought into and attracted us to this location. It seems very unfair and inconsiderate that TDC is proposing to change the zoning bordering these properties to Rural 1 Residenal Deferred. I believe there is no reason to change the zoning of the area T-42a from what it is now.	Opposes the decision to the zoning changes to area T-42a due to impact on residents including loss of open space.
OS26.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Amend	This buffer zone should be kept as Rural Residential. There are a number of benefits to doing this: □ Once this area is developed, the existing residents would still have neighbouring properties of a similar size to their own. This for many, may be considered an acceptable solution and allow them to live the same lifestyle that they moved to this location for. □ The future development of the area would have Rural Residential sized properties available for those that want them. □ Anyone considering a new Rural Residential section, once it's developed, would know exactly what they're buying into and that in front of them could potentially be Residential sections that would be of a higher density. □ These Rural Residential sections could be designed in such a way that they don't require water or sewage reticulation, instead relying on water tanks and septic tank systems. This would cut costs on infrastructure. □ The area would have more green space and plantings which would benefit wildlife. □ There would be less hardscaping and hard surfacing, reducing, the ever increasing, stormwater issues in the region. □ The number of vehicles coming and going would likely be less, reducing carbon emissions and wear and tear on roads.	Like many of the residents that own property on the Rural Residential land that border area T-42a, we bought our property because we enjoyed the open space and reduced number of near neighbors that the section and surrounding area gave us. This is what we bought into and attracted us to this location.	My preference would be to keep the zoning in area T-42a as it is, but an alternatve solution, that would likely meet everyones requirements, would be to retain a "buffer zone" that borders all of the existing Rural Residential properties of area T-42a.

Julia O'Connell

Submitter 27

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS27.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 43 - Proposed PC81 - Zone - Murchison	Oppose	Decline the proposed Commercial zoning of 50 Waller Street, Murchison. Retain the existing Residential zoning. Ensure that future commercial expansion is directed to locations that do not comprise established residential neighbourhoods or place unnecessary pressure on historic home.	In my view, the proposed zoning does not adequately recognise the importance of: • protecting the character and amenity of established residential neighbourhoods. • recognising the contribution that older homes make to local identity and sense of place. • ensuring that commercial growth occurs in locations where adverse effects on existing residential communities can be avoided - namely large undeveloped areas south of property in and around Fairfax Street. • achieving sustainable urban growth while respecting the qualities of existing neighbourhoods. I am concerned that the proposed rezoning would create uncertainty regarding the future of this century-old home and diminish the qualities that make this area of Waller Street an attractive residential area. I feel commercial growth should be directed towards locations where infrastructure, transport and surrounding land uses are already suited to business activities rather than requiring established residential properties to transition into commercial use.	Opposition to the proposed rezoning of land from Residential to Commercial as it affects 50 Waller Street, Murchison and request that the property remains zoned Residential.

Matthew Cropp

Submitter 28

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS28.1	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Oppose	Completely delete the Indicative Walkway overlay from the planning maps where it interfaces with, terminates at, or relies upon the driveway entrance and boundary of 25 Katania Heights (Title DP-452456).	I oppose the location and routing of the indicative walkway for the following reasons: • Total absence of public access rights • Dangerous conflict with private driveway access • Infrastructure security risk • Failure of urban design connectivity • Lack of direct consultation	The inclusion, alignment, and routing of the "Add Indicative Walkway" overlay within T-104a terminating at a privately owned driveway (title DP 452456 – 25 Katania Heights) / accessway serving this is (578543 (title for large water tank – Brightwater Reservoir), 578544 (#29 Katania Heights), 578557 (#33 Katania Heights), 578558, NL5A/868 (title for smaller water tank – Brightwater Reservoir).

				• Redundancy and surplus to requirements. Refer to original submission for more information.	
OS28.2	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Oppose	Remove the Brightwater Development Area overlay from T104a and T104b and return the grandfathered title to it's original Rural 1 low-density zoning which mitigates the adverse effects of reverse sensitivity, keeps the buffer zone currently existing between Residential and Rural zones and reduces the future natural hazard risks to council from the eastern erosion scarp of Katania Heights.	I oppose the 'Brightwater Development Area Overlay' of both T104a and T104b for the following reasons: • Ancillary outcome associated with Katania Heights and Coppermine Crescent Developments. • Geotechnical and Natural Hazard Risks. • Mitigation measures required. • Failure to maintain existing amenity values. • Inappropriate zoning intensity on the rural fringe. • Misplaced Urban Intensification. Refer to the original submission for more information.	Opposes the 'Brightwater Development Area Overlay' of both T104a and T104b.
OS28.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Amend	Regardless of zoning, enforce strict geotechnical setbacks and overlay protections that completely restrict intensive development from occurring on or directly beneath the steep hillsides / erosion scarp in the western portion of T104a, until comprehensive slope stability and catchment assessments are completed for the site and entranceway.	Regardless of zoning, enforce strict geotechnical setbacks and overlay protections that completely restrict intensive development from occurring on or directly beneath the steep hillsides / erosion scarp in the western portion of T104a, until comprehensive slope stability and catchment assessments are completed for the site and entranceway.	Enforce strict geotechnical setbacks and overlay protections that completely restrict intensive development from occurring on or directly beneath the steep hillsides / erosion scarp in the western portion of T104a
OS28.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Oppose	Relocate high-density residential overlays away from the rural fringe and focus intensification efforts strictly within the flat, established core of the Brightwater town centre.	Misplaced Urban Intensification: Intensive urban development is fundamentally better positioned within the flat, existing Brightwater town centre and urban core. Concentrating higher densities near existing commercial amenities, public transport, and central infrastructure aligns with sound planning principles, whereas placing it on the rural fringe increases car dependency, infrastructure inefficiencies and servicing risks.	Relocate high-density residential overlays away from the rural fringe and focus intensification efforts strictly within the flat, established core of the Brightwater town centre.

Kerry Fenton-Johns and Anthony Johns

Submitter 29

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS29.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Amend height limit in Medium Density Residential Zone to 8 metres in most areas.	None given	Oppose in part the 11 metres proposed in most Medium Density Residential areas. Seek amendment to 8m.

Karen Bingham

Submitter 30

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS30.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Strongly oppose 17.1A.3.2 for Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise and Washbourn Drive. I seek that the Council retains the existing Residential Zoning for these streets (as we are now).	Allowing up to 14m high multi-dwelling developments would seriously impact on the environment and residents' well-being. The reasons and significant adverse effects are: • Loss of daylight and sunshine hours • Loss of views and visual amenity • Severe traffic and parking congestion • Shared access provisions. Refer to original submission for more information.	Oppose the proposed section 17.1A.3.2 due serious impact it may have on existing residents, including: • Loss of daylight and sunshine hours • Loss of views and visual amenity • Severe traffic and parking congestion • Shared access provisions.
OS30.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Oppose	I seek that the Council retains the existing Residential Zoning for these streets (as we are now).	The reasons and significant adverse effects are: • Loss of daylight and sunshine hours • Loss of views and visual amenity • Severe traffic and parking congestion • There has not been provision for shared driveways in Plan Change 81. This raises concerns on access to sites, future maintenance, vehicle safety and legal clarity. Refer to original submission for more information.	I seek that the Council retains the existing Residential Zoning for Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise and Washbourn Drive.

Mark and Janet Adamson

Submitter 31

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS31.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Oppose	We OPPOSE any Intensive Development as proposed in Plan Change 81 in reference to 120 Wensley Road.	1. Falling house values and resell issues 2. Lack of privacy and views 3. Traffic – where are all the additional vehicles going to park and exit? As no requirement for every house to have vehicle access 4. Increased noise levels 6. I don't see the bolts and nuts on what developers can build or amenities let alone a requirement for them to consult with neighbors 7. Anti-social behavior and crime increase. Refer to the original submission for more information.	We oppose any Intensive Development as proposed in Plan Change 81 in reference to 120 Wensley Road.

Kathryn Fairbairn

Submitter 32

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS32.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Amend	• Remove or reduce the proposed Medium Density Residential zoning affecting Oxford Street near the Cambridge Street intersection. • Retain a lower-density residential zoning unless detailed evidence demonstrates that parking, traffic and infrastructure can adequately support increased development. • Undertake a location-specific traffic and parking assessment for the Oxford Street and Cambridge Street area before enabling higher-density development. • Require adequate off-street parking for all new medium-density developments. • Strengthen development standards to protect neighbouring properties from overshadowing, loss of sunlight, privacy loss and excessive building bulk. • Ensure infrastructure upgrades are completed before any significant increase in residential density is permitted.	• I do not believe the proposed level of intensification is appropriate for this established neighbourhood without further assessment and stronger protections for existing residents. • Parking is already a significant issue on Oxford Street, particularly around the Cambridge Street area. • Overshadowing and loss of residential amenity. • Neighbourhood Character • Infrastructure Refer to original submission for further details.	Oppose the proposed Medium Density Residential zoning applying to the Oxford Street area, particularly around the Cambridge Street intersection in Richmond. Reasons include parking, traffic and road safety concerns, loss of residential amenity, loss of neighbourhood character and strain on existing infrastructure.

Ewings Poultry

Submitter 33

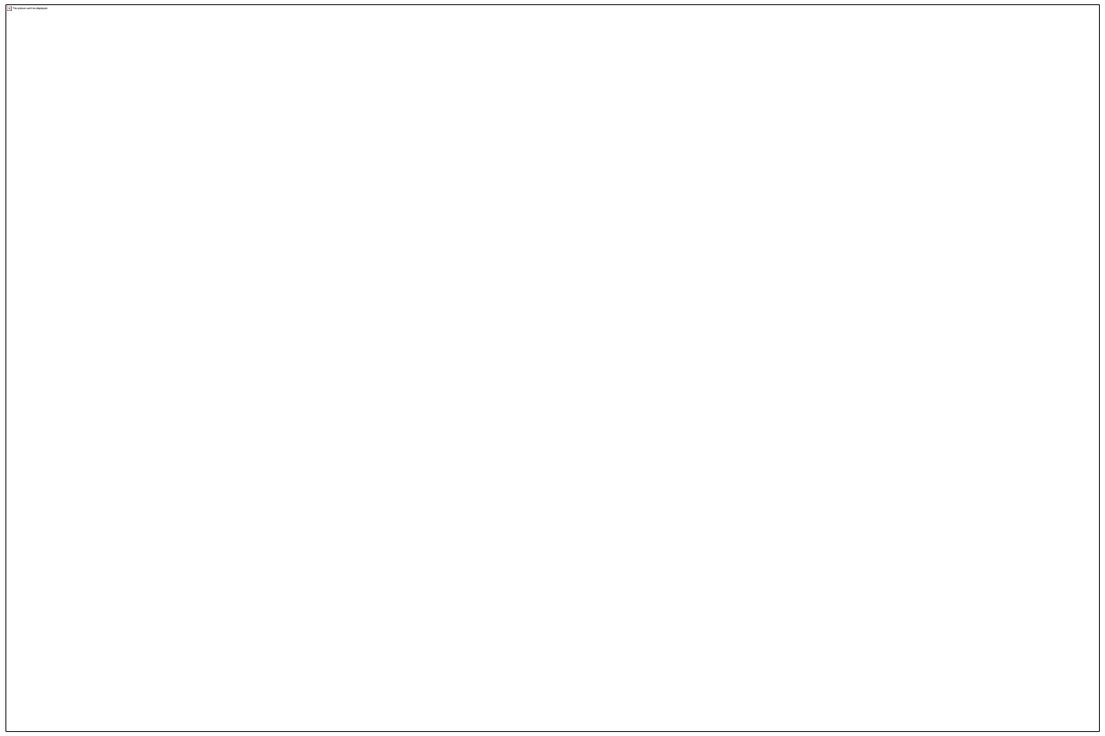
Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS33.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Retain the proposed Rural 1 deferred Mixed Business Zone.	This is because this site has not been used for rural (soil based) production for many years, and has been developed as a part of the Ewing Poultry operation.	Supports the proposed Rural 1 deferred Mixed Business Zone as shown on Zone Map 80-53 - T-122a.
OS33.2	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Retain the Indicative Road as shown between 83 and 65 Main Road Hope.	Hope Land Limited understands the purpose of this Indicative Road, being as a part of providing for a safe and efficient roading network to serve this new Mixed Business Zone. The position of the Indicative Road where it straddles the boundary will however require coordination with the owners/developers of these two sites in future. While this may provide some challenges, it also means the cost ($) would be shared (to some degree) and so provide some fairness to the costs of enabling the land on the south side of Main Road Hope to be used for Mixed Business development - should both parties be equally motivated to proceed.	Support for the Indicative Road as shown between 83 and 65 Main Road Hope (T-122a).
OS33.3	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Retain Indicative Walkway at 87 Main Road Hope.	PC81 also proposes a new Indicative Walkway to the south of the Hope Land Limited property (within 87 Main Road Hope). The location of this Indicative is generally supported, particularly as that land area is solely used for access purposes currently.	Supports the indicative walkway within 87 Main Road Hope (T-122a).
OS33.4	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Retain Indicative Reserve in the location shown.	This reserve is in a logical location and so also supported.	Supports indicative reserve identified to the south of the Hope Land Limited property (T-122a).
OS33.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Support	Retain changes to Objective 5.2.2 as proposed.	The proposed change to Objective 5.2.2 is considered to be appropriate, and will ensure that this objective is consistent with the NPS-UD.	The proposed change to Objective 5.2.2 is considered to be appropriate, and will ensure that this objective is consistent with the NPS-UD.
OS33.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Amend	Retain Policy 6.3.3.1C only if the Transport constraint is removed from the north-eastern side of T-122a.	In conjunction with Objective 6.3.2.3, this proposed new policy is an 'avoidance' policy that imposes a high hurdle for the development of deferred land until such time as all transport and servicing infrastructure is provided in accordance with the NTLDM. While this policy is generally supported, as set out in other parts of this submission, the inclusion of the Transport constraint is not supported, which has a direct bearing on how this policy will be administered. Hope Land Limited therefore only support this policy if the Transport constraint does not apply to the north-eastern end of T-122a. The north-eastern end of T-122a is to be serviced a new intersection at that end.	Retain Policy 6.3.3.1C only if the Transport constraint is removed from the north-eastern side of T-122a.
OS33.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Support	Retain policy 6.3.3.5A.	This new policy promotes a well-connected and efficient road and activity transport network.	Retain policy 6.3.3.5A.
OS33.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond	Amend	Amend Policy 6.8.3.10 to ensure the planned extension of the urban boundary along Main Road Hope is acknowledged as a part of urban growth.	This change to Policy 6.8.3.10 does not adequately address the proposed extension to the urban boundary by the provision for additional Light Industrial and Mixed Business land in Richmond South (Main Road Hope).	Amend Policy 6.8.3.10 to ensure the planned extension of the urban boundary along Main Road Hope is acknowledged as a part of urban growth.
OS33.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond	Amend	Provide additional Explanation in 6.8.30 to acknowledge the additional Light Industrial and Mixed Business land in Richmond South	This change to Policy 6.8.30 does not adequately address the proposed extension to the urban boundary by the provision for additional Light Industrial and Mixed Business land in Richmond South (Main Road Hope).	Provide additional Explanation in 6.8.30 to acknowledge the additional Light Industrial and Mixed Business land in Richmond South

OS33.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Amend	Change the subheading to include Richmond South.	The subheading to this set of rules refers to Richmond West and Motueka, yet this change to rule (i) also relates to Main Road Hope (Richmond South).	Change the subheading of Rule 16.3.4.1 (I) to include Richmond South.
OS33.11	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Amend	Include updated principal reasons in 16.3.20.	No changes to the principal reasons in 16.3.20 are proposed to take account of the new Light Industrial and Mixed Business zones planned within Richmond South.	No changes to the principal reasons in 16.3.20 are proposed to take account of the new Light Industrial and Mixed Business zones planned within Richmond South.
OS33.12	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Include reference to 16.3D in 4C.	This criterion should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are contained and so applied.	Schedule 16.3A (4C) criterion should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are contained and so applied.
OS33.13	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Include reference to 16.3D in criterion 42.	Schedule 16.3A (42) should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are contained and so applied.	Schedule 16.3A (42) should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are contained and so applied.
OS33.14	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.14 Deferred Zone Rules	Amend	Amend 17.14.1 to acknowledge that some of the deferred land is already developed.	17.14.1 of PC81 states: “Deferred zones are used to enable the efficient and streamlined transition of undeveloped land with insufficient servicing to developable land”. (emphasis added) This does not apply to the land within the subject site which is predominantly developed. Not all deferred zones / deferred sites are undeveloped, and this statement in 17.14.1 needs to be corrected to take account of these circumstances.	Amend 17.14.1 to acknowledge that some of the deferred land is already developed.
OS33.15	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.14 Deferred Zone Rules	Amend	Amend Schedule 17.14A so that this Transport Constraint does not apply to the north-eastern side of T-122a.	Schedule 17.14A identifies the following Transport constraint that is required before the deferment is uplifted and the Mixed Business zone becomes available: Transport White Road / SH6 intersection upgrade It is considered that this proposed intersection upgrade is not required for the development opportunity on the north-eastern side of T-122a to become available without a transport constraint. This is because of the planned intersection of the Indicative Road with Main Road Hope. In addition, even if this intersection with White Road was upgraded as a part of sequential development at the southern end of T-122a, a practical roading connection to the subject site may not be made for many years, or not at all. A full and complete connection / linkage is highly unlikely to occur in a short period time.	Amend Schedule 17.14A so that this Transport Constraint does not apply to the north-eastern side of T-122a.

Edward Brett Mytton

Submitter 34

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS34.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Retain the proposed Medium Density Zone over Sec 2 SO591289.	E.B. Mytton supports the proposed Medium Density Zone as shown on Zone Map 80-53. This is because this site immediately adjoins the residential zone and physical access constraints to the west. It is considered that this site is well suited to Medium Density Residential Development.	Supports Medium Density Zone in this location. 
OS34.2	Proposed Plan Change No. 81 > Maps > Area Maps > 20 - Proposed PC81 - Area - Richmond, Gladstone Rd	Support	Remove Indicative Road from 28 Appleby Highway (between Chertsey Road and the Appleby Highway)	PC81 proposes to delete the Indicative Road from the end of Chertsey Road to the Appleby Highway. This change is supported.	Supports removal of indicative road.

OS34.3	Proposed Plan Change No. 81 > Maps > Area Maps > 20 - Proposed PC81 - Area - Richmond, Gladstone Rd	Oppose	Remove the area of Traffic Noise Overlay from Sec 2 SO 591289 and from the immediately adjoining land that is not proposed for residential use or development.	Area Map 80-20 also proposes to add small areas of the Traffic Noise Overlay to the subject site. The located in the southern corner is with D127 and so serves no purpose. The portion also located outside of Sec 2 SO 591289, such as immediately north, also serves no purpose. Any remaining portion of the Traffic Road Noise is so narrow that this should not be included within this site. This is a concern as Rule 16.3.3A.2(j) triggers the requirement for an acoustic assessment for subdivision of land that is wholly or party with the Road Traffic Noise	Opposes Road Traffic noise overlay from this area. Any remaining portion of the Traffic Road Noise is so narrow that this should not be included within this site. To remove the Traffic Nosie Overlay from very small areas such as this, which have the potential to add significant consent processing costs.

				Overlay. The likely cost of such a report for the development of this OSP is not considered to be reasonable, with TDC / Consent Authority likely to identify NZTA as a stakeholder should the applicant seek a waiver of that requirement. It would therefore be better to remove the Traffic Nosie Overlay from very small areas such as this, which have the potential to add significant consent processing costs.	
OS34.4	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Support	Retain changes as proposed.	The proposed change to Objective 5.2.2 is considered to be appropriate, and will ensure that this objective is consistent with the NPS-UD.	The proposed change to Objective 5.2.2 is considered to be appropriate, and will ensure that this objective is consistent with the NPS-UD.
OS34.5	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Support	Retain 16.3.3A.2(a).	This rule requires that subdivision is in accordance with the relevant requirements specified in the relevant Outline Spatial Plan. With reference to the reasons set out under Schedule 16.3D below, this rule is accepted.	Support 16.3.3A.2(a) with reference to the reasons set out under Schedule 16.3D, this rule is accepted.
OS34.6	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density	Support	Retain 16.3.3A.2(b)	This rule sets out the minimum net density of 20 dwellings per hectares for the subject site. This is achievable for the Chertsey Road OSP.	Supports 16.3.3A.2(b) as this rule sets out the minimum net density of 20 dwellings per hectares for the subject site. This is achievable for the Chertsey Road OSP.

	Residential Zone - Vacant Allotment in Outline Spatial Plan area				
OS34.7	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	Amend 16.3.3A.2(f) to specifically provide for the development of the Chertsey Road OSP as a cul-de-sac.	This rule states that Every road roads must be through connected, unless it is a cul-de-sac of 80m or less. The Chertsey Road OSP only has one available access point, being to and from Chertsey Road, and so by default, this entire site cannot be through connected.	Support in part. Amend 16.3.3A.2(f) to specifically provide for the development of the Chertsey Road OSP as a cul-de-sac as there is only one available access point.
OS34.8	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Include reference to 16.3D in criterions 4C and 42.	This criterion should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are contained and so applied.	Support in part. Amend so that Schedule 16.3A(4C) and (42) also references Schedule 16.3D
OS34.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.5: Outline Spatial Plan - Chertsey Road	Amend	1. Remove the required 'Open Space, Recreation and Community Facilities' provisions. 2. Amend the requirement for dwellings to face open space, stormwater corridors, or roads, to ensure the amenity of future residents is appropriately provided for, and avoids	The Outline Spatial Plan – Chertsey Road (Schedule 16.3D.5) is located on pages 181-182 of Appendix 2 (PC81) with the relevant Diagram inserted below (Refer to original submission for more information). Of relevance to the 'Development Reequipments; listed within this Schedule: 1. The 'Community Open Space' areas (green) on this OSP are not contained within Record of Title 1230695. 2. The Indicative Activate Transport Link (Walk/Cycle) are	Oppose in part. Several amendments, refer to original submission for more information. • Remove the required 'Open Space, Recreation and Community Facilities' provisions. • Amend the requirement for dwellings to face open space, stormwater corridors, or roads, to ensure the amenity of future residents is appropriately provided for, and avoids inappropriate weighting in favour of passive surveillance on the south side of residential units. • Remove the restriction on single stored dwellings adjacent to the south-eastern boundary, but add the requirement for appropriate acoustic insulation requirements for two-storied dwellings.

			inappropriate weighting in favour of passive surveillance on the south side of residential units. 3. Remove the restriction on single stored dwellings adjacent to the south-eastern boundary, but add the requirement for appropriate acoustic insulation requirements for two-storied dwellings.	not within Record of Title 1230695. 3. The NZTA Designation is as per the current TRMP. 4. All of the proposed Medium Density Housing Area is within Record of Title 1230695. As a result of the above, the following 'Development Requitements' is not required as a part of this OSP. <u>*Open Space, Recreation and Community Facilities*</u> • A recreation reserve along the stream corridor must be provided, incorporating: o Public open space; o Pedestrian and cycle links; and o Stormwater management functions With this open space, recreation and stormwater management function already existing, there is nothing more that should be required to achieve these 'requirements'. Keeping these within OSP is therefore unnecessary and inappropriate, and doing so could lead to some potential additional requirement that is not part of this OSP. Under 'Land Use' heading, the OSP also requires: <u>*Land Use*</u> • A designation for the Hope Bypass runs along the southern edge of the site. Portions of the site within this designation are not	

				available for development. o The noise attenuation bund must be extended from the north-east across the site to mitigate traffic noise. o Consent notices must be imposed at subdivision stage to record any restrictions affecting further development within the designated area. • Single-storey dwellings are required in the south-eastern section of the site to reduce noise exposure from the potential State Highway 6 realignment. • Dwellings adjoining open space, stormwater corridors, or roads must: o Face public areas to provide passive surveillance. o Include fencing and landscaping that maintain visual connections Dealing first with the requirement for dwellings to open space, stormwater corridors, or roads, it is considered that this needs to be further clarified to ensure the amenity of future residents is not subservient to passive surveillance expectations. For example, the south-western edge of the proposed Medium Density Zone runs alongside an open space and stormwater corridor. Dwellings along that edge would be best to face north-east for the benefit of sunlight amenity, as well as away from the Light Industrial Zone located south-west and future State Highway to the south-east. It is critical that this Requirement is reworded to ensure there is clarity in	

				how this would be interpreted for this particular Medium Density Area. As shown on the OSP, the future State Highway Designation will see part of this site eventually taken (with compensation) for this public work. In addition, an earth bund will need to be formed within the proposed subdivision, consistent with that land vested in Council to the north. Furthermore, there are consent notices to be imposed to restrict further development, plus the requirement for single storied dwellings along the north-east side of the subdivision. While the above Hope Bypass related factors are reasonably commonplace and so expected, the restriction imposing single storied is opposed as this is considered to be an area that two-storied residential development could be accommodated. This form and density of residential development is commonplace in many parts of New Zealand, including adjacent to State Highway corridors, in conjunction with the provisions of acoustic barriers or bunds, and appropriate acoustic insulation.	

Tasman Bay Estates Ltd

Submitter 36

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS36.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	It is requested that the planning maps be amended, to include deferred urban (Residential, Medium Density Residential, Commercial, Open Space) zoning for the Tasman Bay Estate Ltd land located between Horton Road, Mamaku Road and Aporo Road.	Amendments to PC81 to include additional deferred urban zoned land at Tasman to enable greenfield urban growth. Refer to original submission for more information.	It is requested that the planning maps be amended, to include deferred urban (Residential, Medium Density Residential, Commercial, Open Space) zoning for the Tasman Bay Estate Ltd land located between Horton Road, Mamaku Road and Aporo Road.
OS36.2	Proposed Plan Change No. 81 > Chapter 16: General Rules	Amend	Amend provision so that Tasman has a role of Local Service Centre (rather than Local Convenience Centre), to meet the needs of an expanded urban population in this area.	Amendments to PC81 to include additional deferred urban zoned land at Tasman to enable greenfield urban growth. Refer to original submission for more information.	Amend provision so that Tasman has a role of Local Service Centre (rather than Local Convenience Centre), to meet the needs of an expanded urban population in this area.
OS36.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Amend	Amend provision (6.21 Tasman) to reflect growth at Tasman as part of urban redevelopment of Tasman Bay Estate Limited land.	Amendments to PC81 to include additional deferred urban zoned land at Tasman to enable greenfield urban growth. Refer to original submission for more information.	Amend provision (6.21 Tasman) to reflect growth at Tasman as part of urban redevelopment of Tasman Bay Estate Limited land.
OS36.4	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Amend	Amend Schedule 16.3D to include an Outline Spatial Plan for Tasman Village. Preliminary master planning work undertaken by the Submitter would form a basis for this.	Amendments to PC81 to include additional deferred urban zoned land at Tasman to enable greenfield urban growth. Refer to original submission for more information.	Amend Schedule 16.3D to include an Outline Spatial Plan for Tasman Village. Preliminary master planning work undertaken by the Submitter would form a basis for this.
OS36.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Amend Schedule 17.14A to include the necessary infrastructure upgrades to enable implementation of destination zone provisions for Tasman Village.	Amendments to PC81 to include additional deferred urban zoned land at Tasman to enable greenfield urban growth. Refer to original submission for more information.	Amend Schedule 17.14A to include the necessary infrastructure upgrades to enable implementation of destination zone provisions for Tasman Village.

Tasman District Council

Submitter 37

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS37.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 34 - Proposed PC81 - Zone - Mapua, Higgs Rd	Amend	The reserve on Jessie Street is currently proposed to be rezoned as Medium Density Residential Zone	This reserve serves an important function for the community and should be protected	The Parks and Reserves team at TDC request that the Jessie Street reserve be excluded from the proposed zone change and retain its current Open Space Zone classification.

			(MDRZ). We believe this is an error, and the reserve should remain zoned as Open Space Zone (OSZ). Requested Amendment: We request that the Jessie Street reserve be excluded from the proposed zone change and retain its current Open Space Zone classification.	from residential development.	

Andrew Bingham

Submitter 38

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS38.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Oppose	I seek the following decisions from the Tasman District Council: Retain Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise and Washbourn Drive in the Residential zone (as it is now).	Appendix 15.4 – MDR Design Matrices appears unclear, internally inconsistent and insufficient to manage adverse effects on neighbouring properties. Refer to original submission for more information.	Oppose Medium Density Residential Zone and Richmond Intensive Development Precinct, retain Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise and Washbourn Drive in the Residential zone (as it is now).
OS38.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Retain Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise and Washbourn Drive in the Residential zone (as it is now). For shared driveways, where one of the owners wishes to intensify the number of dwellings on their property they should require the consent of all owners of the shared driveway.	Appendix 15.4 – MDR Design Matrices appears unclear, internally inconsistent and insufficient to manage adverse effects on neighbouring properties. Allowing 14 m high multi-dwelling developments will introduce significant adverse effects: • Loss of daylight and sunlight – constructing up to 14 metre structures adjacent to existing single or double-storey homes will severely obstruct solar access. This creates prolonged winter shading, decreases natural indoor warmth, and drives up household energy costs. • Loss of views and visual amenity – high density, multi-dwelling blocks will create dominant, imposing building mass. This destroys the established suburban open space, visually smothers neighbouring properties, and compromises privacy through direct overlooking. This will create neighbourhood character imbalances. • Severe traffic and parking congestion – even if we are close to the town centre, it is likely that many of these dwellings are going to have at least 1 or 2 cars each and will not have enough off-street parking to accommodate these. Shearer Terrace is already congested with parking creating blind spots for pulling out of driveways. It can already be difficult to drive down the street with cars parked on both sides when you meet a vehicle coming the other way. The additional vehicle movements that these multi-dwelling developments will create will materially worsen existing traffic safety and access issues on Shearer Terrace. No provision has been made in Plan Change 81 for how shared driveways are handled.	I live in the proposed Richmond Intensive Development Precinct. I oppose the proposed section 17.1A.3.2. Allowing 14 m high multi-dwelling developments will introduce significant adverse effects including loss of daylight, loss of views and visual amenity, and severe traffic and parking congestion.

				Refer to original submission for more information	

Karla Breen Rickerby

Submitter 39

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS39.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 46 - Proposed PC81 - Zone - Richmond South	Oppose	I seek that Council: Delete the proposed Medium Density Residential zoning from the Chelsea Avenue/Wilkinson Place site. Retain the existing zoning until it can be demonstrated that development can occur without significant adverse effects on transport, infrastructure, stormwater management, residential amenity and landscape character. Alternatively, amend Plan Change 81 to exclude steeply sloping land with constrained road access from medium-density development unless comprehensive evidence demonstrates consistency with the objectives and policies of both Plan Change 81 and the Tasman Environment Plan.	Oppose. I oppose the rezoning of the land off Chelsea Avenue and behind Wilkinson Place to enable Medium Density Residential development. The proposed rezoning is inconsistent with the objectives of Plan Change 81 to provide well-planned urban growth that protects residential amenity, responds appropriately to site constraints, and ensures development is supported by suitable infrastructure and transport networks. The site is physically constrained by steep topography. The scale of earthworks, retaining structures and land modification required to accommodate multi-level housing is inconsistent with the TEP's objective of ensuring development responds appropriately to natural landforms and avoids or minimises adverse environmental effects. The proposal is inconsistent with the principle of good urban design, as the site's physical constraints prevent development that is sympathetic to the existing residential environment. The proposal is likely to set an undesirable precedent for further high-density development on similarly constrained hillside sites, contrary to the objectives of orderly and sustainable urban growth. These physical constraints make the site unsuitable for intensive multi-level residential development. Residential amenity will be significantly diminished. Multi-storey development on elevated land will result in overlooking, loss of privacy, overshadowing and visual dominance over adjoining properties. These effects are contrary to the TEP's direction to maintain and enhance residential amenity and ensure compatible built form within established neighbourhoods. The proposal will result in adverse effects that cannot be adequately avoided, remedied or mitigated, including increased traffic on roads not designed for higher-density development, reduced emergency vehicle access, increased	Oppose rezoning of the greenfield Chelsea Avenue/Wilkinson Place site, retain residential zoning for several reasons including unsuitable topography, proposal lacks good urban design, diminished amenity, loss of privacy, increased traffic, increased stormwater runoff, loss of neighbourhood character, and reduced emergency vehicle access. Refer to original submission for more information.

				stormwater runoff, loss of privacy through overlooking, overshadowing of neighbouring properties, visual dominance, and loss of neighbourhood character. The access road to the site is narrow and constrained, with limited capacity for additional traffic, construction vehicles and emergency services. The proposal does not represent well-functioning urban development. While Plan Change 81 seeks to increase housing supply, it also requires growth to occur in locations where infrastructure, access, environmental constraints and urban design outcomes support higher-density living. This site does not meet those expectations due to its topography, constrained access and the cumulative adverse effects on surrounding residents.	

Sharon Sorenson

Submitter 40

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS40.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Oppose	Oppose Medium Density Housing at the base of Katania Heights.	1. The piece of land is narrow and only able to be accessed of the Katania Heights which is already a busy road. 2. The access would be right beside the underpass access used by cyclists and pedestrians, making this busy access dangerous. 3. Medium Density housing would have a huge impact on the area above the proposed houses with excess noise pollution and light pollution. We chose to live here as it is quiet and has good views of the night sky. 4. The intersection with state highway 6 is already busy at peak times. medium density housing would hugely increase the traffic trying to get in and out of Roberston Road.	Oppose Medium Density Housing at the base of Katania Heights due to negative effects on transport infrastructure, increased light and noise pollution. The land is narrow, and access would be dangerous.

Fonterra Limited

Submitter 41

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS41.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 30 - Proposed PC81 - Zone - Brightwater, Factory Rd	Support	Retain the proposed Light Industrial Zone for Area T-171.	The proposed rezoning of Area T-171 from the Tourist Services Zone to the Light Industrial Zone will better reflect the site's existing industrial activities and provide a zoning framework that is more consistent with the adjoining industrially zoned land to the north along Factory Road. The rezoning will also support a more coherent and logical zoning pattern within the surrounding area.	Retain the proposed Light Industrial Zone for Area T-171.
OS41.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 30 - Proposed PC81 - Zone - Brightwater, Factory Rd	Support	Retain the proposed Light Industrial Zone for Area T-171a.	The proposed rezoning of Area T-171a (Fonterra's Brightwater Site) to Light Industrial Zone broadens the range of industrial activities that may establish as permitted activities compared with the existing Rural Industrial Zone. This provides greater flexibility for future use and development while ensuring the zoning more appropriately reflects the site's intended long term industrial function and its relationship with surrounding industrial land. The rezoning will also support a more coherent and logical zoning pattern within the surrounding area.	Retain the proposed Light Industrial Zone for Area T-171a.
OS41.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 55 - Proposed PC81 - Zone - Takaka Central East	Support	Retain the proposed Light Industrial Zone for Areas T-228, T-229, and T-230.	Areas T-228, T-229 and T-230 are grouped adjacent to one another within Tākaka and currently are zoned Rural 1 (T-228 and T-230) and Residential (T-229) and contain a mix of rural, industrial and residential activities. The proposed rezoning of these areas to the Light Industrial Zone is expected to facilitate a gradual transition toward industrial activities over time, providing greater certainty for the long-term land use pattern. Given their relative proximity to Fonterra's Tākaka Site, the proposed rezoning is considered to provide a more compatible land use and will assist in reducing the potential for reverse sensitivity effects over time. This approach supports the continued operation and future development of the existing industrial activity while providing greater clarity regarding the intended character and function of the surrounding area.	Retain the proposed Light Industrial Zone for Areas T-228, T-229, and T-230.

Warwick Johnston

Submitter 42

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS42.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	The Solution is to withdraw the current Plan Change as it now stands until all issues, effects, consequences and concerns have been addressed via TRMP changes and serious long term Historic Heritage Advice and Consultation not only with all Residents/Householders/Homeowners within the scheduled Wakefield Village Area but also, with the members of the Local Historical Society, namely the Waimea South Historical Society Inc., and other local Historians and Heritage Consultants. Refer to original submission for more information.	The overwhelming, suffocating planning verbiage, especially of Appendix One, cannot mask nor hide the historic, heritage, social, economic, cultural and architectural interconnectedness of the Wakefield Village area. One cannot simply extract one or two streets from the whole. By doing that you have effectively destroyed your own arguments concerning the whole Village area. Refer to original submission for more information.	My submission is based on the very serious lack of Heritage Protection that undermines Plan Change 81, especially regarding the Wakefield Village area.
OS42.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.17 Wakefield	Oppose	In Policy 6.17.1 there is no mention of the recognised historic heritage that is Wakefield – the first inland settlement in the South Island and the second in NZ. Refer to original submission for more information.	The overwhelming, suffocating planning verbiage, especially of Appendix One, cannot mask nor hide the historic, heritage, social, economic, cultural and architectural interconnectedness of the Wakefield Village area. One cannot simply extract one or two streets from the whole. By doing that you have effectively destroyed your own arguments concerning the whole Village area.	In Policy 6.17.1 there is no mention of the recognised historic heritage that is Wakefield – the first inland settlement in the South Island and the second in NZ.

				Refer to original submission for more information.	
OS42.3	Proposed Plan Change No. 81	Oppose	The Solution is to withdraw the current Plan Change as it now stands until all issues, effects, consequences and concerns have been addressed via TRMP changes and serious long term Historic Heritage Advice and Consultation not only with all Residents/Householders/Homeowners within the scheduled Wakefield Village Area but also, with the members of the Local Historical Society, namely the Waimea South Historical Society Inc., and other local Historians and Heritage Consultants. Refer to original submission for more information.	The overwhelming, suffocating planning verbiage, especially of Appendix One (Schedule of Amendments), cannot mask nor hide the historic, heritage, social, economic, cultural and architectural interconnectedness of the Wakefield Village area. One cannot simply extract one or two streets from the whole. By doing that you have effectively destroyed your own arguments concerning the whole Village area. Refer to original submission for more information.	My submission is based on the very serious lack of Heritage Protection that undermines Plan Change 81, especially regarding the Wakefield Village area. I oppose the whole plan as it stands as it is ill conceived, heritage neglectful, but above all else it contravenes Councils own regulations, not only in essence but in spirit, in the form of the TRMP Amenity Effects Section in particular Chapter 10.

Predator Free Rangihaeata

Submitter 43

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS43.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 58 - Proposed PC81 - Zone - Takaka, Puramahoi	Amend	In 6.1.2 your document states "site T140A contains a small number of tributary streams." We would like to be assured that any development occurring on T140A ensures soil disturbance does not result in contamination of waterways and that suitable native riparian plantings are established to protect the quality of freshwater entering waterways.	This proposal sits adjacent to the Little Onahau River. The Little Onahau River flows into the Onahau Wetland and then into the Onahau Estuary. There are freshwater mussels in the Little Onahau River. We are uncertain which species but a freshwater survey carried out by Tom Kroos on behalf of Tasman District Council identified their presence. Depending on the species the conservation status of these mussels would be either threatened or nationally vulnerable. Predator Free Rangihaeata manages the Onahau Sandspit which lies adjacent to the Onahau Estuary, an important foraging site for shorebirds and seabirds and fed by the Little Onahau River.	In 6.1.2 your document states "site T140A contains a small number of tributary streams." We would like to be assured that any development occurring on T140A ensures soil disturbance does not result in contamination of waterways and that suitable native riparian plantings are established to protect the quality of freshwater entering waterways.

Syd Hanna

Submitter 44

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS44.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	I partially support Proposed Plan Change 81, subject to amendments that: • Ensure sufficient on-site parking while investing in improved public transport and active transport infrastructure. • Protect privacy and residential amenity through appropriate setbacks, landscaping, building design and graduated height transitions. • Protect solar access for neighbouring homes, including safeguarding the effectiveness of existing rooftop solar installations wherever practicable. • Place responsibility on developers to appropriately avoid, remedy or mitigate the impacts created by their developments. • Strengthen minimum urban design standards to improve biodiversity, climate resilience, neighbourhood character and long-term liveability. • Encourage cohesive neighbourhood planning rather than fragmented or ad hoc development patterns. • Maintain meaningful opportunities for affected residents to participate in resource consent processes where developments may materially impact their properties. Refer to original submission for more information.	Richmond has the opportunity to become a more vibrant, sustainable and walkable town. Achieving that outcome will require planning that prioritises quality, thoughtful design and fairness for both existing and future residents, ensuring growth enhances the community rather than simply increasing housing numbers. Refer to original submission for more information.	I partially support Proposed Plan Change 81, subject to significant amendments that ensure urban intensification is carefully planned, appropriately designed and does not disproportionately impact existing residents.

Terry Byrne

Submitter 45

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS45.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Oppose	Move the southern boundary line (option 3) to the location shown in original submission. Refer to original submission for more information.	Several reasons including, presence of narrow streets, loss of privacy, negatively impact property values, and existing Urban Design Guide conflicts. Submission supported by several residents of Tollemach street. Refer to original submission for more information.	Move the southern boundary line of the Medium Density Zone to the location (option 3) shown in original submission. Refer to original submission for more information.

Peter David Hill Marian Frances Ayres Hill

Submitter 46

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS46.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support Papakāinga zone.	We support, without qualification, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome.	The rezoning of T-226 to the Papakāinga Zone. We support, without qualification, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome. The legitimate road-safety concern at the Maisey Road / State Highway 60 intersection. We accept this is a genuine issue worth addressing – and section 7 explains how it can be addressed more effectively than by the proposed connection. Refer to original submission for more information.
OS46.3	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	delete Stringer Road–Redmill indicative road connection	Oppose Stringer Road–Redmill indicative road connection. If connectivity required, then a walking and cycling path. Alternatively, a connection to Le Mer View. 6.1 Adverse effects on the existing community and environment - A through-connection would convert Redmill Road from a quiet no-exit road into a through-route - a potential "rat run" for properties on upper Redvale Road and the new development on La Mer View Road for traffic coming and going from the westerly direction. It would introduce adverse traffic, noise and safety effects on approximately 20 existing households for no benefit the network does not already have – a poor and inequitable distribution of effects. - Redmill Road is not formed or designed to carry through-traffic. It has private driveways, and is used informally by residents, children and pets for walking and leisure. Introducing through-traffic creates a real and unnecessary safety risk. - The change would erode the established rural-residential amenity and character of the area – directly relevant under RMA sections 7(c) and 7(f). 6.2 Inconsistency with the Council's own consent notice and objectives - The character of the Galeo Estate is not a private preference. It was imposed and registered by the Tasman District Council itself, through Consent Notice 11141705.5 (issued under section 221 of the RMA as a condition of subdivision consent RM 080969). That consent notice requires, among other things: outdoor lighting restricted to hooded or shrouded fittings directing light downwards and mounted no higher than 900 mm – a dark-sky regime (cl f); no fencing on any lot except low post-and-wire or visually-permeable safety fencing (cl g); landscape-integrated buildings in recessive colours (cls b–c); stormwater managed by gravity to natural gullies, with permeable surfaces and reduced runoff (cl k); and no further subdivision of the lots (cl m). - A lit, kerbed, signed vehicular through-road – with headlight sweep at night, traffic signage, and a large sealed surface shedding concentrated stormwater – is fundamentally inconsistent with the dark, open, low-light, landscape-led, low-density environment the Council itself required and registered against these titles. The Council cannot coherently require residents to mount lights below 900 mm and forgo fences "to protect amenity", while routing a lit connector road through the same community. - The Council's own reserve planning treats Redmill Road as a walking environment: the Moutere-	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffic for this area – duplicating a connection the highway already provides. Its only practical effect would be to divert traffic off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefit to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefit claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection (section 7). Refer to original submission for more information.

				Waimea Ward Reserve Management Plan establishes a Redmill Road Walkway Reserve (Map 21). Routing diverted through-traffic onto Redmill Road is fundamentally at odds with the pedestrian and recreational use the Council itself has designated here. - The connection is also inconsistent with Plan Change 81's own amended objective 11.1.2 (a fully integrated, multi-modal transport system). It serves private vehicles, not active modes, and degrades a currently safe and walkable local road. 6.3 Section 32 and value for money - A new sealed connector road of this kind – requiring earthworks on steep topography and, in all likelihood, land acquisition – would be significant expenditure for a connection that, as set out above, adds nothing the network does not already have. It is not the most appropriate method to achieve the relevant objectives (RMA section 32). The Council's section 32 alternatives evaluation assessed zoning options only; it did not evaluate alternative road alignments, so the connection has not been tested against the "most appropriate method / reasonably practicable options" standard. - The Council's own evaluation records that T-226 performs poorly against the wider growth strategy and is supported on cultural grounds. Significant roading investment to integrate this site into the wider network is therefore not strategy-driven, and is poor value for money at a time of acknowledged budget constraint – particularly where existing local infrastructure, including the area's own walking network, is itself under-maintained. - The Infrastructure Report classifies the site as infrastructure-neutral, with developer-led onsite servicing and "no reticulated network delivery dependency". There is accordingly no servicing need that requires this road. 6.4 Premature and unassessed - The connection is not an operative provision of Plan Change 81, and no site-specific assessment of its effects on Redmill Road has been undertaken. It should not be treated as an expected or default outcome of the rezoning or of any future subdivision. If the framework is not set now, the connection risks being treated at subdivision stage as already accepted, with the existing community's interests considered only as an afterthought. The plan change is the appropriate time to set that framework.	

Fulton Hogan Helen Caley

Submitter 47

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS47.1	Proposed Plan Change No. 81 > Chapter 7: Rural Environment Effects	Amend	Add an additional policy to section 7.1.3 - 7.1.3.X To provide for the aggregate requirements of infrastructure and urban development, recognising the critical role of aggregates for the sustainable management of communities.	Quarrying activities are primary production activities and are most appropriately located in the Rural Environment. This will have flow on benefits for the construction of infrastructure (as directed by the NPS-I), and help ensure that urban development is financially sustainable.	Fulton Hogan request that an additional policy be added to Chapter 7 (Rural Environment Effects) to recognise the importance of aggregate supplies, and support quarrying activities in this location.

				Refer to the original submission for more information.	
OS47.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.4 Industrial Zone Rules > 17.4.2 Land Use	Support	Retain as notified 17.4.2.1 Permitted Activities (Land Use)	As well as quarrying activities, Fulton Hogan undertakes contracting activities, including yard activities typically in industrial zones. Fulton Hogan undertakes activities on all days of the week as required by client and project requirements. Fulton Hogan supports this extension to the day-time noise limits, which will support these activities. Refer to original submission for more information.	Fulton Hogan supports this extension to the day-time noise limits, which will support activities.

Rebecca Patchett

Submitter 48

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS48.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	I ask that the Council amend Plan Change 81 to introduce the following safeguards for the Māpua settlement: 1 - Apply deferred zoning overlays for three waters 2 - Implement traffic growth triggers (staging 3 - Downward adjustments of infill targets 4 - Mandate active transport infrastructure prior to development 5 - Enforce a localized mapua parking management plan 6 - Retain stricter amenity controls Refer to the original submission for more detail.	While I support the principle of managed urban growth and the preservation of surrounding rural land as outlined in the Māpua Masterplan, the growth figures and development timelines proposed in PC81 are inaccurate and unsustainable due to critical, well documented deficits in core infrastructure, severe traffic congestion risks, and an unmitigated loss of coastal village amenity. Refer to original submission for more information.	The submitter opposes in part the urban intensification targets, dwelling yield forecasts, and immediate up-zoning provisions for Māpua under Plan Change 81. Reasons include wastewater capacity, reticulation network fragility, timing disconnect on infrastructure delivery, unmitigated traffic/road risks, parking deficits in commercial and wharf zones and lack of commercial centres for growth at Mapua.
OS48.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	I ask that the Council amend Plan Change 81 to introduce	While I support the principle of managed urban growth and the preservation of surrounding rural land as outlined in the Māpua	The submitter requests amendments to Plan Change 81 to protect Māpua by adding deferred zoning for three waters,

			the following safeguards for the Māpua settlement: 1 - Apply deferred zoning overlays for three waters 2 - Implement traffic growth triggers (staging 3 - Downward adjustments of infill targets 4 - Mandate active transport infrastructure prior to development 5 - Enforce a localized mapua parking management plan 6 - Retain stricter amenity controls Refer to the original submission for more detail.	Masterplan, the growth figures and development timelines proposed in PC81 are inaccurate and unsustainable due to critical, well documented deficits in core infrastructure, severe traffic congestion risks, and an unmitigated loss of coastal village amenity. Refer to original submission for more information.	traffic growth triggers, reducing infill targets, requiring active transport infrastructure before development, enforcing a local parking plan, and keeping strict amenity controls. They support managed growth but believe current growth figures and timelines are unrealistic due to infrastructure shortfalls, traffic risks, and loss of village character.

Mrs C.F McCallum

Submitter 49

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS49.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Oppose	Opposed to rezoning of property at 23b Croucher Street. Refer to original submission for more detail.	• Adverse effects of multi storey properties on small homes/sections. • Infrastructure constraints re: power, water and wastewater. • Increased traffic • Rate increases Refer to original submission for more detail.	Opposed to rezoning of property at 23b Croucher Street, for reasons including increased traffic/parking, possible rates increase, loss of winter sun and possible affect to value of property.

Dallas and Peter Geddes

Submitter 50

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS50.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.2 Objectives	Support	Confirm rezoning	We do not oppose papakāinga development on ancestral land.	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2.
OS50.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support Papakāinga zone.	We support, without qualification, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome.	The rezoning of T-226 to the Papakāinga Zone. We support, without qualification, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome. The legitimate road-safety concern at the Maisey Road / State Highway 60 intersection. We accept this is a genuine issue worth addressing – and section 7 explains how it can be addressed more effectively than by the proposed connection. Refer to original submission for more information.
OS50.3	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Oppose Stringer Road–Redmill indicative road connection. If connectivity required, then a walking and cycling path. Alternatively, a connection to Le Mer View.	**6.1 Adverse effects on the existing community and environment** - A through-connection would convert Redmill Road from a quiet no-exit road into a through-route - a potential “rat run” for properties on upper Redvale Road and the new development on La Mer View Road for traffic coming and going from the westerly direction. It would introduce adverse traffic, noise and safety effects on approximately 20 existing households for no benefit the network does not already have – a poor and inequitable distribution of effects. - Redmill Road is not formed or designed to carry through-traffic. It has private driveways, and is used informally by residents, children and pets for walking and leisure. Introducing through-traffic creates a real and unnecessary safety risk. - The change would erode the established rural-residential amenity and character of the area – directly relevant under RMA sections 7(c) and 7(f). **6.2 Inconsistency with the Council’s own consent notice and objectives** - The character of the Galeo Estate is not a private preference. It was imposed and registered by the Tasman District Council itself, through Consent Notice 11141705.5 (issued under section 221 of the RMA as a condition of subdivision consent RM 080969). That consent notice requires, among other things: outdoor lighting restricted to hooded or shrouded fittings directing light downwards and mounted no higher than 900 mm – a dark-sky regime (cl f); no fencing on any lot except low post-and-wire or visually-permeable safety fencing (cl g); landscape-integrated buildings in recessive colours (cls b–c); stormwater managed by gravity to natural gullies, with permeable surfaces and reduced runoff (cl k); and no further subdivision of the lots (cl m). - A lit, kerbed, signed vehicular through-road – with headlight sweep at night, traffic signage, and a large sealed surface shedding concentrated stormwater – is fundamentally inconsistent with the dark, open, low-light, landscape-led, low-density environment the Council itself required and registered against these titles. The Council cannot coherently require residents to mount lights below 900 mm and forgo fences “to protect amenity”, while routing a lit connector road through the same community. - The Council's own reserve planning treats Redmill Road as a walking environment: the Moutere-Waimea Ward Reserve Management Plan establishes a Redmill Road Walkway Reserve (Map 21). Routing diverted through-traffic onto Redmill Road is fundamentally at odds with the pedestrian and recreational use the Council itself has designated here. - The connection is also inconsistent with Plan Change 81’s own amended objective 11.1.2 (a fully integrated, multi-modal transport system). It serves private vehicles, not active modes, and degrades a currently safe and walkable local road. **6.3 Section 32 and value for money** - A new sealed connector road of this kind – requiring earthworks on steep topography and, in all likelihood, land acquisition – would be significant expenditure for a connection that, as set out above, adds nothing the network does not already have. It is not the most appropriate method to achieve the relevant objectives (RMA section 32). The Council's section 32 alternatives evaluation assessed zoning options only; it did not evaluate alternative road alignments, so	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-traffic for this area – duplicating a connection the highway already provides. Its only practical effect would be to divert traffic off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefit to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefit claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection (section 7). Refer to original submission for more information.

				the connection has not been tested against the “most appropriate method / reasonably practicable options” standard. - The Council’s own evaluation records that T-226 performs poorly against the wider growth strategy and is supported on cultural grounds. Significant roading investment to integrate this site into the wider network is therefore not strategy-driven, and is poor value for money at a time of acknowledged budget constraint – particularly where existing local infrastructure, including the area's own walking network, is itself under-maintained. - The Infrastructure Report classifies the site as infrastructure-neutral, with developer-led onsite servicing and “no reticulated network delivery dependency”. There is accordingly no servicing need that requires this road. **6.4 Premature and unassessed** - The connection is not an operative provision of Plan Change 81, and no site-specific assessment of its effects on Redmill Road has been undertaken. It should not be treated as an expected or default outcome of the rezoning or of any future subdivision. If the framework is not set now, the connection risks being treated at subdivision stage as already accepted, with the existing community’s interests considered only as an afterthought. The plan change is the appropriate time to set that framework.	

Tasman District Council

Submitter 51

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS51.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	The Board requests that Council: 1. Ensure medium-density development provides adequate onsite parking and does not simply transfer parking pressures onto surrounding streets. Parking also needs to considered in the creation of equity of accessibility for housing, for instance making sure that loading and unloading by means of tools like van hoists for wheelchairs, is accommodated for and that there is a reasonable amount of off-road access parking associated for these purposes with each area of housing. This could be accomplished by making a minimum number of off-road accessible parking spaces per ‘X’ number of housing units. 2. Encourage quality landscaping and street tree planting. 3. Ensure adequate outdoor living space. 4. Ensure new development contributes positively to Motueka's natural and built environments. 5. Encourage safe and convenient pedestrian and cycling connections.	The Board seeks further clarification to ensure that: 1. Development capacity is aligned with infrastructure capacity. 2. Transport infrastructure is upgraded in advance of or alongside significant growth. 3. Stormwater and flood risk are properly addressed. 4. The proposed zoning of specific Motueka sites is supported by appropriate transport and infrastructure assessments. 5. Green spaces and natural flood resilience are protected. 6. Productive horticultural land is protected where practicable. 7. Housing intensification is supported by appropriate parking, landscaping, privacy and amenity provisions. 8. Community facilities and recreational infrastructure keep	The Board's primary concern is not whether Motueka should grow, but how that growth occurs. The Board considers that Plan Change 81 provides an important opportunity to establish a coherent long-term framework for Motueka's growth. However, the plan change must ensure that growth is appropriately aligned with infrastructure, transport capacity, stormwater management, community facilities and environmental resilience.

			6. Monitor the cumulative effect of intensification on existing infrastructure. Refer to original submission for more information.	pace with population growth. Refer to original submission for more information.	
OS51.2	Proposed Plan Change No. 81	Amend	The Board requests that Council ensure the final urban form does not result in unnecessary fragmentation or inefficient infrastructure provision.	The Board considers that the sequencing of growth should prioritise: 1. Appropriate development within existing urban areas. 2. Areas where infrastructure can be efficiently extended. 3. Areas that create logical connections with existing neighbourhoods. 4. Protection of highly productive horticultural land wherever possible.	The Board's primary concern is not whether Motueka should grow, but how that growth occurs. The Board considers that Plan Change 81 provides an important opportunity to establish a coherent long-term framework for Motueka's growth. However, the plan change must ensure that growth is appropriately aligned with infrastructure, transport capacity, stormwater management, community facilities and environmental resilience.
OS51.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 40 - Proposed PC81 - Zone - Motueka, Cnr Motueka Valley Hwy - College St	Amend	The Board requests that the proposed zoning of this area be retained only if Council is satisfied that the required transport infrastructure and safe access arrangements can be delivered, or alternatively that appropriate provisions be included in PC81 requiring the necessary transport improvements before significant development proceeds. Also, any development areas would, preferably, have consideration of pedestrian walkways, cycle ways, cross walks, etc. accounted for in the initial planning and building stages.	The Board requests that Council specifically assess: □ the safety of the existing bends in the Mouteka Valley joining into College St., in particular the 35 kph corner, as well as intersection arrangements □ traffic generation from the proposed zoning □ site access □ visibility □ turning movements □ pedestrian safety □ cycling safety □ cumulative traffic effects. The Board considers that these matters should be resolved before significant development occurs, rather than relying on future subdivision or resource consent processes to address fundamental network issues. Refer to original submission for further information.	The Board has specific concerns about the transport implications of development in this location - Motueka Valley Highway/ College Street.
OS51.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 40 - Proposed PC81 - Zone - Motueka, Cnr Motueka Valley Hwy - College St	Amend	The Board requests that the Motueka Integrated Transport Assessment be considered alongside the specific growth areas identified in PC81 and that any	The Board considers that Council should assess: □ existing traffic capacity □ future traffic volumes	The Board is concerned about the cumulative effect of additional residential development on Motueka's existing transport network.

			identified infrastructure deficiencies are clearly linked to a delivery programme. The Board also requests that the intersection at Queen Victoria/ King Edward/ College Street be investigated for what improvements could be done to reduce traffic accidents and that those improvements be made, especially as increasing residential addresses along the Motueka Valley Highway would lead to an increase in traffic at this intersection. Consideration would also be worthwhile at the intersection at Chamberlain Street and College Street as to how increased traffic flows would interact at that intersection. Refer to original submission for more information.	□ intersection performance □ pedestrian safety □ cycling movements □ school-related traffic □ parking impacts □ speed management □ cumulative effects from multiple development areas. Refer to the original submission for more information.	
OS51.5	Proposed Plan Change No. 81	Amend	The Board requests that previous transport assessments relevant to Motueka be reviewed against: □ current population growth □ proposed PC81 zoning □ updated development capacity □ current traffic conditions □ future transport requirements. Refer to original submission for more information.	The Board considers that historic transport assessments should not be relied upon without checking that their assumptions remain valid.	The Board requests that Council provide the Motueka Community Board with an updated summary of how previous transport recommendations align with the infrastructure requirements identified through PC81.
OS51.6	Proposed Plan Change No. 81	Amend	The Board requests that Council clarify: □ what infrastructure constraints currently affect development □ whether there are planning barriers □ whether funding is a constraint □ whether transport infrastructure is a constraint □ what Council's intended pathway is for the area.	The Board's meeting discussions identified concerns about the progress of development at Seaview Heights.	The Board considers that existing areas identified for growth (Seaview Heights) should be progressed where practicable, particularly where infrastructure can be efficiently provided, before creating additional pressures through further urban expansion. The Board requests that Council engage with relevant landowners and infrastructure stakeholders to establish a clear pathway forward. The Board requests to be regularly updated on these issues.
OS51.7	Proposed Plan Change No. 81	Amend	The Board asks Council to investigate whether developments with a high percentage of impermeable surface should be required to provide additional onsite stormwater storage or retention capacity. The Board also asks Council to investigate incentives for rainwater harvesting and reuse, potentially reducing pressure on reticulated water infrastructure as well as development growth aligned with the concept of ‘sponge cities’. The Board requests	As development increases the area of impermeable surfaces, stormwater runoff can increase and existing drainage networks may come under additional pressure. The Board requests that the Plan Change specifically address the cumulative impact of increased development on Motueka's stormwater network.	The Board requests that the Plan Change specifically address the cumulative impact of increased development on Motueka's stormwater network.

			to be consulted with and updated on these issues for the Motueka Ward. Refer to original submission for more information.		
OS51.8	Proposed Plan Change No. 81	Amend	New development should incorporate sufficient: □ parks □ reserves □ public open space □ landscaped areas □ street trees □ natural drainage areas. Refer to original submission for more information.	The Board considers that appropriately designed green spaces can provide both recreational value and natural flood resilience. Refer to original submission for more information.	The Board requests that green space be recognised as an important component of urban infrastructure.
OS51.9	Proposed Plan Change No. 81	Amend	The Board requests that Council engage with NZTA / Waka Kotahi regarding the transport implications of Motueka's future growth.	The Board considers that future strategic transport connections should be considered proactively, including any potential requirement for new or improved bridge infrastructure, and that future transport requirements are appropriately recognised and that the plan change does not unintentionally constrain future strategic transport options.	The Board requests that Council engage with NZTA / Waka Kotahi regarding the transport implications of Motueka's future growth.
OS51.10	Proposed Plan Change No. 81	Amend	The Board considers that significant additional development should not proceed where wastewater capacity is inadequate unless there is a clear, funded and deliverable upgrade programme. The Board requests to be consulted with and updated on these issues for the Motueka Ward.	The Board supports growth where there is a clear and funded pathway for wastewater infrastructure. The Board requests that Council identify the relationship between: □ proposed zoning □ projected population □ wastewater capacity □ planned upgrades □ infrastructure funding □ development staging.	The Board considers that significant additional development should not proceed where wastewater capacity is inadequate unless there is a clear, funded and deliverable upgrade programme. The Board requests to be consulted with and updated on these issues for the Motueka Ward.
OS51.11	Proposed Plan Change No. 81	Amend	The Board specifically requests that the implications of Plan Change 81 growth projections be considered in the ongoing planning for the Motueka Community Pool. The Board considers that a growing population strengthens the case for ensuring that the community has appropriate aquatic and recreation facilities. The Board	The Board considers that population growth must be accompanied by appropriate investment in community infrastructure. This includes: □ parks □ schools □ medical facilities	The Board specifically requests that the implications of Plan Change 81 growth projections be considered in the ongoing planning for the Motueka Community Pool. The Board considers that a growing population strengthens the case for ensuring that the community has appropriate aquatic and recreation facilities.

			requests to be consulted with and updated on these issues for the Motueka Ward.	? sports facilities ? recreation ? libraries ? community facilities ? swimming facilities.	
OS51.12	Proposed Plan Change No. 81	Amend	The Board requests that active transport connections be incorporated into new development areas from the beginning. Refer to original submission for more information.	The Board considers that creating disconnected residential areas would increase reliance on private vehicles and place additional pressure on Motueka's existing road network. Refer to original submission for more information.	The Board requests that active transport connections be incorporated into new development areas from the beginning.
OS51.13	Proposed Plan Change No. 81	Amend	The Board supports appropriate housing intensification but requests that Council carefully consider parking impacts. The Board requests that parking provisions for higher-density development be reviewed in the context of Motueka's particular transport environment.	The Board is concerned that insufficient onsite parking could result in: ? increased on-street parking ? reduced pedestrian safety ? congestion ? reduced accessibility ? pressure on existing neighbourhoods.	The Board requests that parking provisions for higher-density development be reviewed in the context of Motueka's particular transport environment.
OS51.14	Proposed Plan Change No. 81	Amend	The Board requests that Council ensure that Plan Change 81 supports the ongoing vitality of the High Street commercial area and does not inadvertently encourage development patterns that undermine the role of the town centre.	The Board requests that Council ensure that Plan Change 81 supports the ongoing vitality of the High Street commercial area and does not inadvertently encourage development patterns that undermine the role of the town centre. Refer to original submission for more information.	The Board requests that Council ensure that Plan Change 81 supports the ongoing vitality of the High Street commercial area and does not inadvertently encourage development patterns that undermine the role of the town centre.

Paula Louise Cottle and Christopher Lowdon

Submitter 52

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS52.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules >	Amend	Amend the Wakefield MDRZ height rules to mirror the restrictions applied to Mapua, placing a strict maximum building cap of 8 metres (two storeys) across all residential zones in Wakefield (including	To safeguard the existing village character, sunshine access, and visual amenity. Refer to original submission for more information.	Amend the Wakefield MDRZ height rules to mirror the restrictions applied to Mapua, placing a strict maximum building cap of 8 metres (two storeys) across all residential

	17.1A.3 Building Construction or Alteration		Higgins Road and Bird Road parcels T-194a and T-194c)		zones in Wakefield (including Higgins Road and Bird Road parcels T-194a and T-194c).
OS52.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Impose a strict infrastructure staging rule that legally prevents the activation of development of any MDRZ, or Rural-Residential units (including parcel T-198a) in Wakefield until NZTA has fully completed and opened Stage 2 of the SH6 Hope Bypass.	Ensuring the highway network has actual capacity to absorb local growth. Refer to original submission for more information	Impose a strict infrastructure staging rule that legally prevents the activation of development of any MDRZ, or Rural-Residential units (including parcel T-198a) in Wakefield until NZTA has fully completed and opened Stage 2 of the SH6 Hope Bypass.
OS52.3	Proposed Plan Change No. 81 > Maps > Area Maps > 28 - Proposed PC81 - Area - Wakefield, Bird Ln	Oppose	Delete or defer the indicative road connection linking the Pitfure development area to Higgins road until Higgins road, Brid road, and Lord Rutherford road south are structurally capable of safely absorbing multi-subdivision traffic alongside existing active cycle trail users.	Until Higgins road, Brid road, and Lord Rutherford road south are structurally capable of safely absorbing multi-subdivision traffic alongside existing active cycle trail users. Refer to original submission for more information	Oppose indicative road connection linking the Pitfure Development to Higgins Road.
OS52.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 62 - Proposed PC81 - Zone - Wakefield, Bird Ln	Oppose	Decline or defer the MDRZ and Rural-Residential up-zoning status on Higgins Road. Refer to original submission for more information.	until the Tasman District Council allocated direct, upfront public funding to fully raise and widen the road, construct dedicated protected cycle lanes, implement heavy vehicle traffic calming measures, structurally raise and widen all single-lane bridges across Higgins Road and Lord Rutherford Road South.	Decline or defer the MDRZ and Rural-Residential up-zoning status on Higgins Road until the Tasman District Council allocated direct, upfront public funding to fully raise and widen the road, construct dedicated protected cycle lanes, implement heavy vehicle traffic calming measures, structurally raise and widen all single-lane bridges across Higgins Road and Lord Rutherford Road South.
OS52.5	Proposed Plan Change No. 81 > Maps > Zone Maps > 31 - Proposed PC81 - Zone - Brightwater, Higgins Rd	Oppose	Decline or defer the MDRZ and Rural-Residential up-zoning status on Higgins Road until the Tasman District Council allocated direct, upfront public funding to fully raise and widen the road, construct dedicated protected cycle lanes, implement heavy vehicle traffic calming measures, structurally raise and widen all single-lane bridges across Higgins Road and Lord Rutherford Road South.	Until the Tasman District Council allocated direct, upfront public funding to fully raise and widen the road, construct dedicated protected cycle lanes, implement heavy vehicle traffic calming measures, structurally raise and widen all single-lane bridges across Higgins Road and Lord Rutherford Road South. Refer to original submission for more information	Decline or defer the Rural- residential up-zoning status on Higgins Road until transport infrastructure improvements are made to the surrounding roads.
OS52.6	Proposed Plan Change No. 81 > Maps > Zone Maps > 62 - Proposed PC81 - Zone - Wakefield, Bird Ln	Oppose	Remove or defer the MDRZ and deferred MDRZ status on Higgins Road and Bird Road	Remove or defer the MDRZ and deferred MDRZ status on Higgins Road and Bird Road until the Inundation Overlay restrictions are cleared and the council implements a fully funded urban stormwater solution capable of handling 1-in-100-year storm events without increasing runoff risk to adjoining properties. Refer to original submission for more information.	Remove or defer the MDRZ and deferred MDRZ status on Higgins Road and Bird Road until stormwater upgrades are made so that 1-in-100-year storm events without increasing runoff risk to adjoining properties.
OS52.7	Proposed Plan Change No. 81 > Maps > Zone Maps > 63 - Proposed PC81 - Zone - Wakefield, Pitfure Rd	Oppose	Remove or defer the MDRZ and deferred MDRZ status on Higgins Road and Bird Road	Remove or defer the MDRZ and deferred MDRZ status on Higgins Road and Bird Road until the Inundation Overlay restrictions are cleared and the council implements a fully funded urban stormwater solution capable of handling 1-in-100-year storm events without increasing runoff risk to adjoining properties.	Remove or defer the MDRZ and deferred MDRZ status on Higgins Road and Bird Road until stormwater upgrades are made so that 1-in-100-year storm events without increasing runoff risk to adjoining properties.

				Refer to original submission for more information.	
OS52.8	Proposed Plan Change No. 81 > Maps > Zone Maps > 62 - Proposed PC81 - Zone - Wakefield, Bird Ln	Oppose	Oppose rezoning T-108.	Retain the strict Rural 1 zoning buffers throughout Spring Grove to permanently prevent the physical and visual merger of Wakefield, Spring Grove and Brightwater. Remove or significantly scale back the Light Industrial Zone overlay at the Higgins/Bird Road intersection to protect the residential and semi-rural boundary line. Refer to original submission for more information	Oppose rezoning T-108. Retain the strict Rural 1 zoning buffers throughout Spring Grove to permanently prevent the physical and visual merger of Wakefield, Spring Grove and Brightwater. Remove or significantly scale back the Light Industrial Zone overlay at the Higgins/Bird Road intersection.
OS52.9	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Oppose	Oppose uplifting of deferred zoning in Wakefield.	Place a strict legal block on activating any deferred zones in Wakefield until explicitly capacity expansion agreements are secured with local social infrastructure providers, specifically including primary healthcare capacity at the Wakefield Medical Centre to ensure existing and new residents can access medical treatment indies the own village. Refer to original submission for more information	Oppose uplifting deferred zoning in Wakefield until there is capacity in social infrastructure eg Wakefield medical centre.
OS52.10	Proposed Plan Change No. 81 > Maps > Zone Maps > 63 - Proposed PC81 - Zone - Wakefield, Pitfure Rd	Oppose	Decline all up-zoning frameworks across the Pitfure Stream catchment.	Decline all up-zoning frameworks across the Pitfure Stream catchment boundaries until independent hydraulic modelling proves that structural modifications to the Wai-iti River systems can successfully eliminate tailwater back-pressure risks on the urban stormwater grid. Refer to original submission for more information	Decline all up-zoning frameworks across the Pitfure Stream catchment boundaries until independent hydraulic modelling proves that structural modifications to the Wai-iti River systems can successfully eliminate tailwater back-pressure risks on the urban stormwater grid.
OS52.11	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Impose a binding moratorium on activating the Wakefield MDRZ footprint	Until capital founding for the replacement Wakefield Community Hub is fully reinstated and locked into the Councils active Annual/Long-term Plan budgets. Refer to original submission for more information	Impose a binding moratorium on activating the Wakefield MDRZ footprint until capital founding for the replacement Wakefield Community Hub is fully reinstated and locked into the Councils active Annual/Long-term Plan budgets.

Michael and Vicky Gargiulo

Submitter 53

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS53.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Support the plan change - Zone Map attached		Support the plan change.
OS53.2	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Support Plan Change 81 - Area Map attached		Support Plan Change 81

Gillian Brewer

Submitter 54

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS54.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Oppose	Loss of all morning sunlight and therefore warmth. Loss of 50% of privacy due to height of buildings. In ability to see to my right when exiting driveway and Wilkes Street is avenue to all all schools and day care facilities in area. Loss of views to Tahunanui and Monaco and surrounding areas. Depressing buildings - black, grey and white - slums of next century if last that long.	Adverse effects to amenity - loss of sunlight, privacy, access concerns and views.

Joanne and Gary O'Reilly

Submitter 55

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS55.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Oppose	Medium density does not meet needs of elderly and will lead to investment in weekend retreats and holiday homes so not meet housing need of people wanting to live in Māpua	There is a disconnect between the push for high-density, multi-storey housing and the actual physical needs of aging residents. Focus on land scarcity and economic efficiency, completely overlooking the human reality of aging; two storey homes are not a viable option for the elderly. Because of the desirability of Mapua as a destination, our concerns are that denser infill housing may favour outside investors looking for weekend retreats and/or holiday homes; possibly left to sit empty for parts of the year.
OS55.2	Proposed Plan Change No. 81	Oppose	Oppose	Housing density in Māpua already adequate	The existing housing density in Māpua is already more than adequate to meet local needs without compromising community's identity. Intensification to medium-density is far more appropriate for established, well-serviced urban centres which possess the commercial scale and infrastructure to support it.
OS55.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Oppose	Village already walkable and bikeable. Local streets have limiting capacity especially in holiday seasons. Concerns re congestion and safety issues for pedestrians and cyclists.	For those who live here the village is already walkable/bikeable. Residents still need to travel further afield and for those working, or attending medical appointments, travelling to the airport etc; a car has become a basic necessity. We have chosen to live in Mapua Village, and we accept that travel is inevitable. In Mapua, local streets feature limited capacity, (especially in the holiday season) raising concerns over both congestion and safety for pedestrians and cyclists.
OS55.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Oppose	Increase pressure on stormwater infrastructure, flood risks and impact on village ambience	Proposed medium intensity will have secondary impacts on stormwater management, flood risks and cause loss of the village ambience.

Judith Mary Mitchell

Submitter 56

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS56.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Zoning changes under this plan should be set aside and reconsidered. Should be a limit to the number of houses that can be built in the main village area of Mapua ie bordered by Higgs Road, Aranui Drive and the coast, and that no building should be more than two storeys high. Development along Seaton Valley that is on greenfield or productive land should be limited to allow retention of that land for growing food.	1. No explanation in report that states why so many more houses needed evidenced by drop in Māpua school numbers because young families can't afford to live in Māpua. 2. Can not trust developers to build more affordable homes. 3. Should be a limit to the number of houses that can be built in the main village area of Mapua ie bordered by Higgs Road, Aranui Drive and the coast, and that no building should be more than two storeys high. 4. Allow retention of that land for growing food 5. There is no provision for new schools, medical facilities, or anything other than vague 'commercial' designations. 6. Under the old Rural 3, designs for housing estates meant building with the land rather than reshaping it. 7. Too many unresolved challenges for zoning to continue in its current form.	Reconsider zoning under the headings - sustainability, including traffic predictions, climate change predictions, protection of productive land, and fundamentally, the vision of a future Mapua
OS56.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Oppose	Oppose development along Seaton Valley	1. Need to protect our productive land, green field places and water tables to grow our own food for the next generations. 2. The Waimea Plains and flat land Motueka are already having housing creep. Do not want to end up in the unenviable position of Queenstown and land outside Christchurch which is rapidly growing only houses.	Oppose development along Seaton Valley that is on greenfield or productive land as this land should be retained for growing food
OS56.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 32 - Proposed PC81 - Zone - Mapua, Aranui Rd	Oppose	Reconsider zoning to take into account the character of Māpua for the benefit of those who live and visit there.	Development will make Māpua much busier with traffic, will make access to foreshore more challenging and will not resolve current ecological, infrastructure and affordable housing issues.	Oppose development that diminishes character of Māpua as a destination for its size, waterfront, estuary, access to cycle trail, and overall peace and tranquility in a district with rapid development.
OS56.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Oppose	Zoning to consider climate change and sea level rise.	1. Little account seems to be taken of sea level rise which is predicted to flood most of lowland Mapua as it did years ago. 2. Mapua Wetland swamp, part of our property, borders land that is all stones, as it was once where a stream met the seashore. Sea rise is happening faster than first predicted, like temperature rise, exponential rather than gradual.	Zoning changes should be reconsidered in light of climate change, flooding and sea level rise predictions

				3. More frequent rain and flooding events, already experienced, will overwhelm our ground water systems.	
OS56.5	2-Out of Scope	Amend	TDC to lead removal of contaminated soils.	1. Mt Hope subdivision development was on a HAIL site from which the toxic ex-orchard soils should have been removed, but with no local sites prepared to accept them, and the cost, the soil was buried on site in plastic next to Aranui park boundary 2. This HAIL site will become someone else's problem in the future. The issue of HAIL sites needs to be more council led. 3. It remains to be seen if the runoff from the site will be coped with sufficiently by the existing structures or overflow into the reserve and wetland.	Reconsideration of development impacting HAIL sites and removal of contaminated soils.
OS56.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	1. Stronger requirements similar to Rural 3 zoning that require developments to protect existing wetlands, plantings, mature trees and scenic reserves in the area 2. Consult with neighbouring landowners if destruction planned of existing plantings or vegetation	1. Mt Hope subdivision supported some good planning decisions by reducing number of houses and supporting landscape design that make the subdivision more attractive and suitable to Māpua. 2. No consultation when fenceline between development and wetland in Aranui Park was destroyed and overhanging trees were cut back.	Zoning should support plantings that are extensive and support scenic reserves and wetland restoration in the area
OS56.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Reconsider zoning based on growth forecasts	1. Māpua school numbers declining because young families can't afford housing in the area 2. Don't believe developers will build affordable houses	No evidence provided to support growth demand
OS56.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Reconsider zoning to address unresolved infrastructure challenges	1. The method of piping under the Mapua Channel needs to be re investigated after the hearings on the proposed Mapua Ramp reminded everyone that the soil on Waterfront Park especially that nearest the channel, must not be disturbed due to the invisible toxicity that remains permanently beneath the cap. 2. There is no provision for new schools, medical facilities, or anything other than vague 'commercial' designations.	1. The infrastructure needed for such a large increase in houses is not yet there and will be a big burden on ratepayers.
OS56.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Reconsider zoning because of traffic impacts	1. None of the roads in the Mapua Ruby Bay area can cope with extra traffic of the numbers estimated. 2. The intersection with Mapua Drive is a known hazard. There is currently parking near the wharf but getting to or from there will become gridlocked in summer. If the estimated over 70 vehicles towing boats per day along the roads bordering Mapua to reach the ramp. 3. Crossing Aranui Road on foot in summer is a challenge, helped now by a few crossings.	1. To turn character of Māpua into a town like any other and crowd the roads with so much traffic makes it no longer an appealing place to visit or live. 2. Roads needed for such a large increase in houses is not yet there and will be a big burden on ratepayers.

				4. The lead into Mapua Drive from the coastal highway is inadequate at certain times of the day, especially for vehicles with boats.	3. While the number of extra car movements and noise has been estimated, how those issues are to be solved is not clear.

Steven Judge and Tracey Judge and Dr Lauren Judge and Adam Todd

Submitter 57

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS57.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support rezoning	No issues with rezoning	Support and have no issues with the proposed rezoning of site T-226 from Rural 3 zone to Papakāinga zone
OS57.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	1. Remove the proposed through-road connecting Redmill Road (Galeo estate) to the Papakāinga zone as detailed in Appendix 3 Infrastructure Report June 2026 section 11.6 2. Consider instead a walking track/biking track of simple gravel construction to allow the flow of people and bikes between the areas but avoiding all other forms of traffic.; OR 3. Alternatively allow no transit between Galeo Estate and Papakāinga estate allowing them to remain self-contained estates. 4. Consideration of safety issues at Maisey Road intersection with SH60 and the potential for increased volumes of traffic especially during commuting and school times.	1. Opening a transit through-road will immediately impact the quiet, tranquil rural, residential cul-de-sac status of Redmill Road which has been enjoyed by its residents since the estate's development. 2. No need for Galeo Estate or Papakāinga estate to become transit estates as the Papakāinga estate can function adequately as a cul de sac estate similar to Galeo, Ridgway Estates and the estates off Stringer Road. 3. Residents will have to endure increase in traffic volumes and associated traffic noise undermining the reason for originally purchasing a property in the Galeo estate because of its quite, tranquil, low traffic volume values. 4. Safety of residents especially young families, dog walkers, walkers and cyclists will be compromised because of increase in traffic volumes including in transit road construction phase in Galeo estate but equally once Papakāinga estate established there will likely be safety issues for its residents. 5. Through-road potentially opens up an additional traffic route for every other housing domain currently off Stringers Road and in the future e.g. Eban Road, Martin Conway Road and other sections at top of Stringer Road. 6. Construction activities will involve a considerable amount of earthworks, drainage works, electrical works, landscaping, road seal work, road lighting, pathway construction, noise, dust, mud	1. Oppose the formation of a through road between Redmill Road and the Papakāinga zone because residents of Galeo Estate have not been consulted and no cost benefit analysis including geotechnical, engineering road transport analysis reports and impact studies have been used to assess the benefit, it appears to be a nice to have rather than being necessary and will have further impacts and consequences on the residents due to earthworks, noise, dust, heavy vehicle traffic and all other infrastructure works related to roading, telecommunications, electricity supply, pathway construction. 2. The current cul de sac function of Galeo Estate has served residents well as a quiet and safe residential area. Galeo estate is a self-contained estate responsible for its own communal assets. Each lot owner is a member of the Management Company established to manage the communal assets and utilities. The through road devolves and degrades the estate's ability to operate and function as a self-contained entity managing impacts from road users. 3. Increase in traffic volumes is in area where known accident black spot i.e. Maisey Road junction to access SH60.

				and heavy traffic which will create disturbance for many months for the residents. 7. Wear and tear on Galeo estate roads will increase as a result of through-road traffic. 8. No benefits only risks when increasing traffic into areas known as accident hot spots. Maisey Road/Westdale Road junctions with SH 60 from 2000 to 2022 has had 3 fatalities, 5 severe injuries, 9 minor injury accidents. Stringers Road junction with SH60 from 2000 to 2022 has had 0 fatalities, 0 severe injuries and 2 minor injury accidents.	

Friedrich Holer and Gerlinde Holer and Phil Holer and Simon Holer

Submitter 58

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS58.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	Retain update map as drafted in relation to the location of land to be rezoned for Mixed Business at Main Road Hope, and in particular the Submitters property. Delete the deferral over the zoning of 65 Main Road Hope and upzone it to Mixed Business immediately under PC81, and remove it from Schedule 17.14A; or If this submission is not accepted, retain the update map as drafted (refer to original submission for more information).	Support their land being rezoned to mixed business because their front property is already used for commercial or business purposes, location good for mixed business in terms of frontage to state highway, land adjacent and on opposite side of Main Road Hope also used for business purposes, drainage corridor already designated under TRMP will form a physical and spatial barrier to residential development, land is resilient, supports economic well being, consistent with the FDS and NPS UD. Oppose the use of the deferred zoning framework for their property because there is the potential to access and service the site independent of the wider service upgrades noted in the deferred schedule 17.14A, the deferred zoning adds uncertainty to the future development of a site, there is uncertainty to the deferred zoning framework due to Plan Change 79. Refer to original Submission for more information.	Submitters support the identification of their land (within T-122a) for future mixed business growth, but seeks that the deferral is removed from their property at 65 Main Road Hope. So seeks that 65 Main Road Hope is rezoned from Rural 1 to Mixed Business.
OS58.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	Amend zone map in relation to the balance of land at 65 Main Road Hope, rezoning it from Rural 1 to Residential (or deferred Residential if not able to be fully serviced with connection to existing urban services) in accordance with	Oppose land to the rear of their property (and site T-122a) remaining Rural 1 because:	Oppose land at 65 Main Road Hope, to the rear of the T-122a, being Rural 1. Amend to rezone land to Residential (or deferred Residential if services are not fully available).

			Plan A in the submission. Refer to original Submission for more information. Delete the Richmond South Development Area annotation as it relates to 65 Main Road Hope on the update map; or If the submission above is accepted (rezone the remaining land at 65 Main Road Hope from Rural 1 to Residential), delete the Richmond South Development Area annotation as it relates to the Mixed Business Zone on 65 Main Road Hope.	- The land is within the Richmond South Development Area and identified as part of a wider residential development area T-38 under the FDS - The land will be surrounded by urban land - Rural 1 zoning is not allowing for efficient development use - PC81 and the Pukerua Subdivision envisages future road access to the site - On-site stormwater management will be enabled from existing planned upgrades - Rezoning the land to Residential is consistent with the FDS and NPS UD. Oppose the Richmond South Development Area annotation as it relates to that part of 65 Main Road Hope in the deferred Mixed Business Zone. Reasons: The RSDA and related rules and guidelines in the TRMP apply to residential areas only. The RSDA annotation has not been extended to include other properties in the deferred Mixed Business Zone. The rear of 65 Main Road Hope is outside the existing or proposed urban boundary of Richmond under PC81. Refer to original Submission for more information.	
OS58.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.6 Land for Commercial Activities > 6.6.3 Policies	Support	Retain Policy 6.6.2.3 as drafted.	Support Policy 6.6.2.3 for Commercial Land (of which the Mixed Business is one zone): A supply of suitably located commercial land to provide for the medium to long-term needs of the Tasman and Nelson region. Reason: This is consistent with changes to the TRPS, and the intention of Plan Change 81 to ensure sufficient and well-located business land to support economic growth and employment.	Retain and support Policy 6.6.2.3 as drafted.
OS58.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Oppose	Oppose the deferred status of the Mixed Business Zone in T-122a. Delete the deferral over the zoning of 65 Main Road Hope and upzone it to Mixed Business immediately under PC81, and remove it from Schedule 17.14A; or If this submission is not accepted, retain the update map as drafted. Oppose the White Road/SH 6 intersection upgrade being a deferment uplift trigger as it relates to 65 and 83 Main Road Hope. Amend the infrastructure requirement in Schedule 17.14A for T-122a to read: Transport: White Road / SH6 intersection upgrade, except for 65 and 83 Main Road Hope.	The Submitters oppose the use of the deferred zoning framework for the subject land under Plan Change 81, for reasons that: • there is potential to access and service the site independent of the wider service upgrades noted in Schedule 17.14A, including via on-site solutions to stormwater management; • a deferred zoning adds uncertainty and complexities to the future development of a site; and	Oppose the deferred status of T-122a. Rezone to Mixed Business without deferral. Deferred zoning adds uncertainty and complexities.

			Refer to original Submission for more information	• due to Plan Change 79, the deferred zoning framework and the mechanism to uplift the deferral is currently uncertain and open to further change. if other service needs are met, then there is no reason why the northern end of the zone could not have its deferral uplifted to allow development to proceed as that does not rely on or place pressure on the White Road/SH 6 intersection. Refer to original Submission for more information	
OS58.5	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Retain the indicative road on the update map as drafted.	Support the location of the Indicative Road within the Main Road Hope Mixed Business Zone. Reasons: A new road connection is necessary if new development cannot access direct onto Main Road Hope. NZTA and Council have plans to bridge the adjoining drainage reserve to facilitate upgrading the Borcks Creek, which will necessitate relocation of the existing access to 65 Main Road Hope. The Indicative Road will enable the intersection to be formed in a location that provides for continued access to the Submitters' existing business while also supporting business growth of the wider area in T-122a. Being on the shared boundary with 83 Main Road Hope, it promotes the efficient use for both sites.	Retain and support the location of the Indicative Road within the Main Road Hope Mixed Business Zone (T-122a).
OS58.6	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	Partial support for the Indicative Reserve along the rear boundary of the deferred Mixed Business Zone in Main Road Hope. Delete the indicative reserve along the rear of the deferred Mixed Business Zone on the update map as drafted; or If our submission above is accepted (rezone the remaining land at 65 Main Road Hope from Rural 1 to Residential), retain the indicative reserve along the rear of the deferred Mixed Business Zone on the update map as drafted but clarify its purpose.	Supported on the understanding that this is to accommodate the re routed drain currently through the centre of land to the rear of the property (ie it is a drainage reserve, not an open space reserve), Delete the indicative reserve along the rear of the deferred Mixed Business Zone on the update map as drafted; or If our submission above is accepted (rezone the remaining land at 65 Main Road Hope from Rural 1 to Residential), retain the indicative reserve along the rear of the deferred Mixed Business Zone on the update map as drafted but clarify its purpose. 8 However, we question whether this should appropriately be part of PC81 as it would be formed and vested only when the land behind is developed for urban purposes.	Partial support for the Indicative Reserve along the rear boundary of the deferred Mixed Business Zone (T-122a) in Main Road Hope.
OS58.7	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Support the location of the Indicative Reserve (D247 – for Stormwater Drainage) where it is shown on the northwest boundary of the Submitters' property (within T-122a). Retain the Indicative Reserve (Drainage) and D247 on the update map as drafted.	PC 81 does not amend any existing designations. This, and the Indicative Reserve relating to it, aligns with where shown on the operative TRMP.	Support the location of the Indicative Reserve (D247 – for Stormwater Drainage) where it is shown on the northwest boundary of the Submitters' property (within T-122a).
OS58.8	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Support the location of the Indicative Walkway on the northeastern side (45 Main Road Hope) of the Indicative Reserve / D247. Retain the Indicative Walkway on the update map as drafted.	This is a logical extension to the Indicative Roads shown on that side of the Drainage Reserve, formed in conjunction with development of land already zoned for residential subdivision under the TRMP, it will have the higher amenity (where not adjoining business development) and is optimally placed for the adjoining residential community that it will serve.	Support the location of the Indicative Walkway on the northeastern side (45 Main Road Hope) of the Indicative Reserve / D247. Retain the Indicative Walkway on the update map as drafted.

OS58.9	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Support the location of the Indicative Road from Collins Road, and its extension across the Indicative Drainage Reserve. Retain the location of the Indicative Walkway from Collins Road, including as it extends across the Indicative Drainage Reserve to land on the south side of the Rural 1 Deferred Mixed Business Zone on 65 Main Road Hope.	In previous meetings between the Submitters and Council staff, the Submitters were advised that the Council will pay for and construct the bridge, as prior to any stormwater drainage network upgrade, this water way is only a narrow width The indicative road in its realigned position shows the intention that this is a 4-way intersection, not a T intersection, and its eventual connectivity to possible future residentially-zoned land in Richmond South and the existing Pukerua Subdivision. The future bridge crossing is in a more optimal position as a future road link than shown in the Operative TRMP, including as any future extension of the road can form a buffer to the adjoining Mixed Business Zone.	Support and retain the location of the Indicative Road from Collins Road, and its extension across the Indicative Drainage Reserve.
OS58.10	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Support the location of the Indicative Road from Collins Road, and its extension across the Indicative Drainage Reserve. Retain the location of the Indicative Walkway from Collins Road, including as it extends across the Indicative Drainage Reserve to land on the south side of the Rural 1 Deferred Mixed Business Zone on 65 Main Road Hope.	In previous meetings between the Submitters and Council staff, the Submitters were advised that the Council will pay for and construct the bridge, as prior to any stormwater drainage network upgrade, this water way is only a narrow width The indicative road in its realigned position shows the intention that this is a 4-way intersection, not a T intersection, and its eventual connectivity to possible future residentially-zoned land in Richmond South and the existing Pukerua Subdivision. The future bridge crossing is in a more optimal position as a future road link than shown in the Operative TRMP, including as any future extension of the road can form a buffer to the adjoining Mixed Business Zone.	Support and retain the location of the Indicative Road from Collins Road, and its extension across the Indicative Drainage Reserve.
OS58.11	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	Support further Indicative Roads being shown on the Area Map on the land to the rear of 65 Main Road Hope is zoned Residential. If the land is rezoned Residential. amend update map in relation to the balance of land at 65 Main Road Hope, showing Indicative Roads in accordance with Plan B in the submission. Refer to original Submission for more information.	If this land is zoned Residential, the indicative roads provide for connectivity to and/or from adjoining development in the RSDA and, by ensuring land has appropriate road access, will facilitate future greenfield development of T-38 under the FDS.	Support further Indicative Roads being shown on the Area Map on the land to the rear of 65 Main Road Hope (near T-122a) is zoned Residential.
OS58.12	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	Support further Indicative Roads being shown on the Area Map on the land to the rear of 65 Main Road Hope (near T-122a) if zoned Residential. If the land is rezoned Residential. amend update map in relation to the balance of land at 65 Main Road Hope, showing Indicative Roads in accordance with Plan B in the submission. Refer to original Submission for more information.	If this land is zoned Residential, the indicative roads provide for connectivity to and/or from adjoining development in the RSDA and, by ensuring land has appropriate road access, will facilitate future greenfield development of T-38 under the FDS.	Support further Indicative Roads being shown on the Area Map on the land to the rear of 65 Main Road Hope (near T-122a) if zoned Residential.
OS58.13	Proposed Plan Change No. 81	Support	Support the general intent of the Plan Changes as a whole	Support the general intent on the grounds that it is generally consistent with the outcomes sought in the TRSP	Support the general intent of the Plan Changes as a whole

James Edward Leader

Submitter 59

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS59.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	I seek that Council amends the specific Plan Change provision 17.1A.3.1(j), as follows: All buildings are setback 3.0.metres from an internal boundary to an adjoining site.	I wish to have amended the setback of 1.5 metres from side and rear internal boundaries - to 3.0 metres, because of the loss of privacy and visual impact of a multistorey building. Footnote :: I have had the experience in Christchurch of a 2 storey townhouse development next door, and the 3.0 metres setback made a big difference to the loss of privacy and visual impact.	Oppose in part. I wish to have amended the setback of 1.5 metres from side and rear internal boundaries - to 3.0 metres, because of the loss of privacy and visual impact of a multistorey building.
OS59.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	I seek that Council amends the specific Plan Change provision 17.1A.3.1.(m), as follows: Buildings are setback at least 3.0 metres from internal boundaries (sides and rear), except:	I wish to have amended the setback of at least 1.5 metres from side and rear boundaries - to 3.0 metres, because of the loss of privacy and visual impact of a multistorey building. Footnote :: I have had the experience in Christchurch of a 2 storey townhouse development next door, and the 3.0 metres setback made a big difference to the loss of privacy and visual impact.	Oppose in part. I wish to have amended the setback of at least 1.5 metres from side and rear boundaries - to 3.0 metres, because of the loss of privacy and visual impact of a multistorey building.
OS59.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	I seek that Council amends the specific Plan Change provision 17.1A.3.1(o). as follows: Accessory buildings are setback at least 3.0 metres from side and rear boundaries, but less than 3.0 metres if:	I wish to have amended the setback of at least 1.5 metres from side and rear boundaries - to 3.0 metres, because of the loss of privacy and visual impact of a high accessory building. Footnote :: I have had the experience in Christchurch of a 2 storey townhouse development next door, and the 3.0 metres setback made a big difference to the loss of privacy and visual impact.	Oppose in part. I wish to have amended the setback of at least 1.5 metres from side and rear boundaries - to 3.0 metres, because of the loss of privacy and visual impact of a high accessory building.

Ryan and Kylie O'Connell

Submitter 60

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS60.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Amend	We do not oppose Plan Change 81 or the introduction of the Medium Density Residential Zone in Brightwater. We submit that our property at 41A Ellis Street (Lot 2 DP 529041, Title Identifier 856663) should be included within the proposed zone, and that the current boundary as drawn is incorrectly defined.	1. Driveway ownership and infrastructure control: Our property holds fee-simple ownership of the shared access driveway serving both 41A and 41 Ellis Street (confirmed by Record of Title, Identifier 856663). The front property at 41 Ellis Street holds only a right of way under Easement Instrument 11314325.2. Any medium-density development at 41 Ellis Street would depend on access infrastructure we own. Rezoning the front property while excluding the infrastructure owner creates a direct conflict between the zoning intent and the legal reality of land ownership. 2. Fragmented zoning contrary to good planning: Rezoning the front 812m2 section to MDRZ while leaving our larger 984m2 rear section at standard residential density produces a fragmented outcome contrary to PC81's own	Support in part and oppose in part Amend the Plan Change 81 MDRZ boundary map for Brightwater to include 41A Ellis Street (Lot 2 Deposited Plan 529041, Title Identifier 856663) within the Medium Density Residential Zone, extending the zone boundary to encompass both the front and rear sites at 41 and 41A Ellis Street. This would resolve the infrastructure ownership

				objectives. Our section is well-suited to medium-density development. Excluding it reduces intensification capacity and creates a boundary with no logical basis in the physical characteristics of the land. 3. Prejudice to rear title holder: If PC81 proceeds as notified, our property will be directly and materially prejudiced through loss of amenity, solar access, visual outlook, and reduced market value, despite our ownership of infrastructure upon which any neighbouring development depends. 4. Reservation of rights: If the Council proceeds without including our property, we put the Council on notice of direct and material prejudice to our property rights and reserve all rights to seek further relief, including through a subsequent plan change request or appeal to the Environment Court under the Resource Management Act 1991.	conflict, deliver a logical and integrated zoning boundary, and better achieve the Council's objectives for coordinated urban intensification in Brightwater.

Homes for Wakefield

Submitter 61

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS61.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Regulate the area as medium density only so that only a maximum number of houses can be built.	N/A	Whilst the Pearless Flat area, where there are 7 social housing flats for elderly residents, has been earmarked as medium density our group would like to see the 3,500 m2 land (of which 1,750m2 bare land) be regulated as medium density only, so that in future a maximum number of smaller houses can be built on this site. Refer to original submission for more information
OS61.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	Relieve financial burden for medium density through development contributions, additional dwelling consent, and building consent	We feel the cumulative effects will discourage landowners particularly in a village like Wakefield and stifle Councils long term objectives.	We have some concerns regarding the financial burden Council is imposing on an applicant who wishes to engage within these areas designated for Medium Intensity as set in Plan change 81
OS61.3	2-Out of Scope	Amend	I encourage Council to revise its public-facing information so this relationship between building height and boundary setbacks is explained more clearly.	Doing so would help address community concerns and improve confidence and support for the plan.	Submitter is concerned that the public-facing information regarding setbacks, sunlight access, and visual dominance is not conveying the whole message to the community.
OS61.4	Proposed Plan Change No. 81	Amend	We recommend that we include regulations requiring downward-directed outdoor lighting and the use of warmer colour temperatures where appropriate.	These measures are increasingly common internationally and offer full functionality while protecting our ability to enjoy the night sky.	As residential density increases, cumulative light pollution has the potential to diminish the quality of the night sky.
OS61.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	We encourage Council to strengthen the plan's messaging and implementation so that it actively supports a greater proportion of smaller units	To better reflect Wakefield's demographics and identified housing demand.	Provide for smaller units in Wakefield

OS61.6	Proposed Plan Change No. 81	Support	More homes within the existing township is a sensible approach that makes better use of existing infrastructure while helping to reduce urban sprawl onto surrounding productive land. While increasing housing supply is important, it is equally important that the types of housing delivered reflect local need.	While increasing housing supply is important, it is equally important that the types of housing delivered reflect local need.	We support Plan Change 81 and the overall direction of enabling housing intensification within Wakefield.

AD and JI Johnston Family Trust

Submitter 62

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS62.1	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	We support the deletion of all the indicative road shown in black cross hatched on this map (80-23)	it would allow the implementation of property development that better utilises the land for housing. Refer also our "oppose in part" in this submission.	We support the deletion of all the indicative road shown in black cross hatched on this map (80-23). Refer to original submission for more information.
OS62.2	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	Replace with an Indicative Road Extension of Collins Road as shown in red shading on the attached JFT Map A. Road is entirely on current 28 Collins Road (JFT) land. Refer to original submission for more information.	because it does not allow the implementation of property development that better utilises the land for housing. • Alignment of Collins Road extension has for decades been along the boundary of 28 Collins Road (Johnston Family Trust (JFT)) and 45 Main Road Hope (Suttons). This has influenced JFT future development plans. • Suttons and developer Modus Group (MG) are concluding negotiations to acquire the JFT land along the boundary and install the extension as per JFT Map A. • TDC planners have agreed in principle – refer MG email attached. • Alignment better preserves the privacy of 28 Collins Road prior to development. • JFT Map A implementation results in a single, contiguous development parcel for the JFT. • JFT Map A implementation, provides efficient and appropriately located access to enable the development of 45 Main Road Hope, without compromising the layout or yield of that development. • JFT Map A implementation allows MG to take ownership of the land required for the Collins Road extension without breaking the JFT land into several parcels. • JFT Map A implementation allows cost sharing between JFT and MG to implement the Collins Road Extension in a timely manner.	Oppose all the indicative road shown in dashed blue on this map (80-23). Delete and replace with an Indicative Road Extension of Collins Road as shown in red shading on the attached JFT Map A. Road is entirely on current 28 Collins Road (JFT) land.

Rosalie and Pat Conneely

Submitter 63

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS63.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Remove the extent of MDRZ in Māpua.	Loss of character, concern around infrastructure capabilities and need to protect open space and amenity values in Māpua.	Oppose. Opposes the extent of the proposed MDRZ in Māpua, notably loss of village character and concern around infrastructure capacity to serve additional development. There is a need to protect the coastal village character, open space, mature trees and amenity values that distinguish Māpua from larger urban settlements.

Debbie Dale and Bernie County

Submitter 64

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS64.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Oppose	No amendment specified in submission.	No amendment specified in submission.	Oppose. Noise impact resulting from unpredictable noise generated by high impact commercial operations which may result from the rezoning. Older houses and properties will be impacted the most, including the submitter's residential address.
OS64.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Oppose	No amendment is recommended in the submission.	No amendment is recommended in the submission.	Reclassifying residential land to commercial causes a risk for neighbouring residents, as it could allow operations with severe environmental and detrimental social impacts. Disturbances may include commercial signage, exterior lighting, noise generated by volume of vehicles, loss of privacy and visual intrusion.
OS64.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Oppose	Look for alternative development along Seaton Valley.	The rezoning is incompatible with the surrounding residential context and will negatively impact on the quality of life of residents.	The surrounding area is overwhelmingly residential, characterised by quiet living conditions and family homes. Converting the land from proposed residential to commercial use will disrupt the established character and residential amenity of the neighbourhood, setting a harmful precedent for commercial encroachment into residential zones.

Peter and Sally Jansen van Vuuren

Submitter 65

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS65.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support rezoning to Papakāinga.	Support development on ancestral land. Refer to original submission for more information.	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone and support development on ancestral land.
OS65.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed	Oppose	we ask the Council to keep Redmill Road as a cul-de-sac, to provide any connectivity to the new development as a walking/cycling path rather than a road, to require a full site-specific assessment of effects before any vehicle connection	The proposed Stringer Road–Redmill Road connection provides no connectivity that the roading network does not already have. It would run broadly parallel to State Highway 60 (the Coastal Highway) – the purpose-built arterial that already carries through-	We oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road and Redmill Road being treated as an

	PC81 - Area - Moutere, Stringer Rd		to Redmill Road could be relied upon, and to support instead a direct Stringer Road–La Mer View connection. Our detailed relief is set out in section 8. Refer to original submission for more information	traffic for this area – duplicating a connection the highway already provides. Its only practical effect would be to divert traffic off that purpose-built State Highway onto a quiet residential cul-de-sac never designed for it. That is not a benefit to the network – it is a transfer of harm onto approximately 20 existing households. Any "resilience" or "additional access" benefit claimed is largely illusory, and in any event delivered better, shorter and cheaper, and without harm to existing residents, by a direct Stringer Road–La Mer View connection. Further reasons include: • Adverse effects on the existing community and environment • Inconsistency with the Council's own consent notice and objectives • Section 32 and value for money • Premature and unassessed Refer to original submission for more information.	expected or default outcome of the rezoning or of subdivision.
OS65.3	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.2 Objectives	Support	support objectives 10A.2.1 and 10A.2.2	The rezoning of T-226 to the Papakāinga Zone. We support, without qualification, the ability of whānau to live on their ancestral land (objectives 10A.2.1 and 10A.2.2). Nothing in this submission should be read as opposing that outcome. Refer to original submission for more information	Genuine support for papakāinga and the principles of Te Tiriti o Waitangi (RMA sections 6(e), 7(a) and 8; objectives 10A.2.1 and 10A.2.2). We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2.

Mt Hope Holdings

Submitter 66

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS66.1	Proposed Plan Change No. 81	Support			The Submitter supports the general intent of Plan Change 81
OS66.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	The submitter seeks that the OSP and MDRZ provisions be amended to remove a minimum density requirement.	Tasman District Council are not a specified territorial authority, and are not obligated to impose minimum density requirements. TRPS Change 1 includes provision to enable intensification to achieve growth targets but, appropriately, does not include minimum development densities as a method of implementation. The Plan Change 81 provisions should also enable but not mandate higher development densities, in line with this.	The submitter supports the existing Māpua urban area identified through Plan Change 81 for strategic growth through implementation of the Medium Density Residential Zone (MDRZ). PC81 also introduces an Outline Spatial Plan (OSP) that will apply to the Higgs Road area. WITH amendments

OS66.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	The Submitter opposes these changes	it places unnecessary cost onto applicants to address low-level risks of reverse sensitivity effects for Council, on low-speed roads; is inequitable as these roads are already located within existing residential areas that are not subject to the same requirements, and; that there appears to be little evidence to demonstrate that there are existing reverse sensitivity effects that require management.	Plan Change 81 seeks to introduce a new Road Traffic Noise Overlay. This is reflected in the planning maps, and new objectives, policies and rules are proposed which relate to this overlay.
OS66.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Support	Retain update map as drafted	Rezoning is consistent with changes to the TRPS, and the intention of Plan Change 81 to ensure sufficient and well-located residential land for housing growth.	Support rezoning of site from Rural 1 deferred Residential to Medium Density Residential
OS66.5	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Support	Remove indicative road from the map	Existing indicative road linking to neighbouring land is inappropriate given proposed adjacent commercial zoning, so removal is appropriate.	Support removal of indicative road from the map
OS66.6	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Oppose	Delete Road Traffic Noise Overlay from update map.	Provisions related to Road Traffic Noise overlay place unnecessary cost onto applicants to address low-level risks of reverse sensitivity effects for Council, on low speed roads.	Road Traffic Noise Overlay from update map
OS66.7	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects	Oppose	Delete provision	This provision places unnecessary cost onto applicants to address low-level risks of reverse sensitivity effects for Council, on low-speed roads	Submitter opposes introduction of the policy relating to road noise Policy 5.2.3.8A
OS66.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	Retain part (a) of the policy, delete parts (b) to (d) of the policy	The TRMP provisions should enable the higher densities sought, but should not mandate them, as to do so could result in planning blight in circumstances where there is no market for the housing densities required. The information requirements proposed at 19.2.2.7A include a requirement to provide an assessment of the market demand for the size of lots or houses being proposed. This acknowledges that there are market forces that will determine the viability of a given development. It is unnecessary and inappropriate for Council to have a role in determining whether the density proposed is appropriate. The NPS-UD directs local authorities to assess demand, for the purpose of ensuring there is sufficient development capacity, by preparing and publishing an HBA (clauses 3.10 and 3.20-3.27 NPS-UD) not by requiring this information from applicants on a consent-by-consent basis.	Support part (a) of the policy. Opposes parts (b) to (d) of the policy.
OS66.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Delete parts (a) and (b)(iii).	As detailed above, mandating a minimum density may result in planning blight. Where a market exists, enabling higher densities is sufficient.	Oppose parts (a) and (b)(iii) which specify minimum densities.
OS66.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Oppose	Delete provision and any associated matters for discretion	As detailed above, mandating a minimum density may result in planning blight. Where a market exists, enabling higher densities is sufficient.	Opposes introduction of conditions requiring that subdivision achieves a certain net density
OS66.11	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.4 Restricted Discretionary Activity Subdivision (Medium Density Residential Zone - Vacant Allotment not in Outline Spatial Plan area)	Oppose	Delete provision and any associated matters for discretion.	As detailed above, mandating a minimum density may result in planning blight. Where a market exists, enabling higher densities is sufficient.	Oppose introduction of conditions requiring that subdivision achieves a certain net density.

OS66.12	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Oppose	Delete provision and any associated matters for discretion.	This provision places unnecessary cost onto applicants to address low level risks of reverse sensitivity effects for Council, on low-speed roads.	Oppose introduction of condition requiring acoustic assessment to accompany application for subdivision in the MDRZ where within the Road Traffic Noise Overlay.
OS66.13	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Oppose	Delete reference to minimum densities	As detailed above	Oppose inclusion of minimum densities
OS66.14	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Delete provision and any associated matters for discretion.	As detailed above, mandating a minimum density may result in planning blight. Where a market exists, enabling higher densities is sufficient.	Oppose introduction of conditions requiring that development achieves a certain net density.
OS66.15	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Delete provision and any associated matters for discretion	This provision places unnecessary cost onto applicants to address low level risks of reverse sensitivity effects for Council, on low-speed roads.	Oppose introduction of Restricted Discretionary condition requiring acoustic assessment to accompany application for Comprehensive Development in the MDRZ where within the Road Traffic Noise Overlay.
OS66.16	Proposed Plan Change No. 81 > Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications > 19.2 Information Required for Land Use or Subdivision Consent Applications > 19.2.2.7A	Oppose	Delete parts (b) – (d).	As detailed above – this is not an appropriate assessment matter for Council's. An applicant will have made an assessment as to the market viability of a development of a particular density before designing it. Council does not have a role in assessing this.	Oppose parts (b) – (d) relating to information requirements for proposals that do not meet minimum density requirements.

Natural Hazards Commission Toka Tū Ake

Submitter 67

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS67.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain provision. Support Medium Density Residential Zone in the following locations T-22b, T-22c, T-178a, T-232a, T-232b, T-29a, T-29c, T-194a, T-194c, T-33a, T-33b, T-002.	We support medium density residential development in areas of low flood risk. The mitigation options identified in the assessment against the NPS-NH are plausible ways to reduce flood risk and the impacts on people and property.	Support Medium Density Residential Zone in the following areas: T-22b, T-22c, T-178a, T-232a, T-232b, T-29a, T-29c, T-194a, T-194c, T-33a, T-33b, T-002, T-103 which are areas of low flood risk.
OS67.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.	We support medium density residential development where there is low flood risk and medium tsunami risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where appropriate mitigation is in place. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two or more unrelated natural hazard events have the potential to affect human life	Support Medium Density Residential Zone in the following locations; T-22a, T-237a, T-237g, where there is low flood risk and medium tsunami risk, after mitigations have been applied. Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.

				and/or property1, while compounding hazards are where one hazard amplifies or makes the effects of another hazard worse. Although a site may be suitable for development when individual hazards are considered in isolation, the combined effect of multiple hazards can result in a higher overall level of risk. These sites are exposed to both flood and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development. The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as part of 6.2.3 Land Effects from Urban Growth could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology2 could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. References: • 1Auckland Council, 2014. Natural hazard risk communication toolbox. • 2NHC, 2025. Risk Tolerance Methodology. Refer to original submission for more information including reference links.	
OS67.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain the provision.	We support medium density residential development where there is medium tsunami risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where appropriate mitigation is in place. Evacuation can be an appropriate way to manage tsunami risk where safe and practical routes are identified, maintained, and incorporated into development planning.	Support Medium Density Residential Zone in these locations T-246a and T-246b where there is medium tsunami risk, after mitigations have been applied.
OS67.4	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.	We support medium density residential development where there is low flood risk, low liquefaction risk, and medium tsunami risk after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where appropriate mitigation is in place. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two	Support Medium Density Residential Zone in the following locations T-11a, T-112a, T-112b, T-115a, T-138a where there is low flood risk, low liquefaction risk, and medium tsunami risk after mitigations have been applied. Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.

				or more unrelated natural hazard events have the potential to affect human life and/or property1, while compounding hazards are where one hazard amplifies or makes the effects of another hazard worse. Although a site may be suitable for development when individual hazards are considered in isolation, the combined effect of multiple hazards can result in a higher overall level of risk. These sites are exposed to flood, liquefaction, and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development. The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as part of 6.2.3 Land Effects from Urban Growth could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology2 could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. References: • 1Auckland Council, 2014. Natural hazard risk communication toolbox. • 2NHC, 2025. Risk Tolerance Methodology. Refer to original submission for more information including reference links.	
OS67.5	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.	We support medium density residential development where there is medium flood risk, low liquefaction risk, medium tsunami risk, and medium coastal inundation risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where risk can be appropriately managed. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two or more unrelated natural hazard events have the potential to affect human life and/or property1, while compounding hazards are where one hazard amplifies or makes the effects of another hazard worse. Although a site may be suitable	Support Medium Density Residential Zone in the following locations T-190a, T-190b, T-190c, T-190d, where there is medium flood risk, low liquefaction risk, medium tsunami risk, and medium coastal inundation risk, after mitigations have been applied.

				for development when individual hazards are considered in isolation, the combined effect of multiple hazards can result in a higher overall level of risk. These sites are exposed to flood, liquefaction, coastal inundation, and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development. The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as part of 6.2.3 Land Effects from Urban Growth could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology2 could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. References: 1Auckland Council, 2014. Natural hazard risk communication toolbox. 2NHC, 2025. Risk Tolerance Methodology. Refer to original submission for more information including reference links.	
OS67.6	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.	We support medium density residential development where there is low flood risk, low liquefaction risk, low coastal inundation risk, and medium tsunami risk, after mitigations have been applied. This aligns with the NPS-NH, which enables development in medium risk areas where appropriate mitigation is in place. We also recommend that Council considers the cumulative and compounding effects of natural hazards. Cumulative hazards occur where two or more unrelated natural hazard events have the potential to affect human life and/or property1, while compounding hazards are where one hazard amplifies or makes the effects of another hazard worse. Although a site may be suitable for development when individual hazards are considered in isolation, the combined effect	Support Medium Density Residential Zone in the following locations T-11b, T237b, T-240a, T-240b, where there is low flood risk, low liquefaction risk, low coastal inundation risk, and medium tsunami risk, after mitigations have been applied. Retain the provision, provided cumulative and compounding natural hazard risk is considered and managed.

				of multiple hazards can result in a higher overall level of risk. These sites are exposed to flood, liquefaction, coastal inundation, and tsunami risk, and the cumulative and compounding effects of these hazards should be considered when determining their suitability for development. The effect of cumulative and compounding hazards could be considered when assessing areas for urban growth. For example, an additional policy as part of 6.2.3 Land Effects from Urban Growth could be added; avoid development expanding into areas where the risk from cumulative and compounding natural hazards is unacceptable. NHC's Risk Tolerance Methodology2 could assist Council to determine what level of risk is acceptable. Accounting for these types of hazards ensures that risk remains at acceptable levels and can help to reduce the impacts on people and property. References: 1Auckland Council, 2014. Natural hazard risk communication toolbox. 2NHC, 2025. Risk Tolerance Methodology. Refer to original submission for more information including reference links.	
OS67.7	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > N	Support	Retain provision. Supports definition of Net density.	We support the definition of net density excluding land that is constrained by natural hazards. This helps avoid creating expectations for intensification in areas where future development may increase exposure of people and property to natural hazards.	We support the definition of net density excluding land that is constrained by natural hazards. This helps avoid creating expectations for intensification in areas where future development may increase exposure of people and property to natural hazards
OS67.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.10 TAkaka > 6.10.3 Policies	Amend	The following amendment is made: Include a definition, policy direction or assessment criteria that clarifies what 'appropriately mitigated' means for flood risk. This could include acceptable levels of residual risk, finished floor levels, requirements for safe access and egress routes, and preventing flooding on neighbouring properties.	Without a clear threshold or definition, there may be uncertainty about the level of mitigation that is required, which could lead to inconsistent decision-making. This is important because inconsistent interpretation and application of flood risk management requirements could result in development occurring in locations where risk remains high, potentially increasing exposure to flooding hazards over time.	Support with amendments. We support residential activities being enabled only where flood risks are appropriately mitigated. However, the term 'appropriately mitigated' should be clearly defined or supported by measurable assessment criteria. The following amendment is made: Include a definition, policy direction or assessment criteria that clarifies what 'appropriately mitigated' means for flood risk. This could include acceptable levels of residual risk, finished floor levels, requirements for safe access and egress routes, and preventing flooding on neighbouring properties.
OS67.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment	Support	Retain the provision.	We support the identification of the potential dam break hazard risk from the dam off Seaton Valley Road. Dam break flooding can be difficult to manage because	We support the identification of the potential dam break hazard risk from the dam off Seaton Valley Road. Dam break flooding can be difficult

	Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues			it is often rapid onset with limited warning time. Including this issue in the plan supports risk-based planning and can help reduce impacts on people and property.	to manage because it is often rapid onset with limited warning time. Including this issue in the plan supports risk-based planning and can help reduce impacts on people and property.
OS67.10	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Amend	The following amendment is made: Outline the requirements for assessing dam break risk and include a definition, policy direction or assessment criteria that clarifies what 'appropriately mitigated' means for dam break risk. This could include consideration of flood depth and velocity, warning time, safe access and egress, evacuation routes, residual risk, and any effects on neighbouring sites and downstream areas.	We recommend that the Policy is more specific about appropriate management and the matters that must be addressed through assessment and mitigation. This will improve clarity and ensure that risk assessments are applied consistently.	Support with amendments. We support requiring dam break risk assessments for residential development located downstream of the dam at 75 Seaton Valley Road. Assessing risk for residential property supports a risk-based planning approach and can reduce the impact of natural hazards on people and property. However, we recommend that the Policy is more specific about appropriate management and the matters that must be addressed through assessment and mitigation. This will improve clarity and ensure that risk assessments are applied consistently. The following amendment is made: Outline the requirements for assessing dam break risk and include a definition, policy direction or assessment criteria that clarifies what 'appropriately mitigated' means for dam break risk. This could include consideration of flood depth and velocity, warning time, safe access and egress, evacuation routes, residual risk, and any effects on neighbouring sites and downstream areas.
OS67.11	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.20 Methods of Implementation	Support	Retain the provision.	Requiring applications to demonstrate how the risk has been assessed and managed helps give effect to the related issue and policy direction for the Seaton Valley Outline Spatial Plan area. It also supports consistent decision-making and can help to reduce the impact of natural hazards on people and property.	We support this regulatory method because it provides a clear mechanism for ensuring dam break hazard risk is assessed and managed. Requiring applications to demonstrate how the risk has been assessed and managed helps give effect to the related issue and policy direction for the Seaton Valley Outline Spatial Plan area. It also supports consistent decision-making and can help to reduce the impact of natural hazards on people and property.
OS67.12	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.1 Issues	Support	Retain the provision.	While dam break flooding is often rapid onset with limited warning time. Identifying these hazards as part of the issues in the plan is important because it provides the basis for policies and rules to reduce the impact of natural hazards on people and property.	Support 6.16.1.1. We support the recognition of flood hazard risk and possible dam break hazard in the Brightwater Development Area. Flooding can damage property and cause significant disruptions to communities. While dam break flooding is often rapid onset with limited warning time. Identifying these hazards as part of the issues in the plan is important because it provides the basis for policies and rules to reduce the impact of natural hazards on people and property.
OS67.13	Proposed Plan Change No. 81 > Chapter 6: Urban Environment	Amend	The following amendments are made: A definition for significant flood hazard risks is provided. For example, this could align with	We support this policy because it seeks to manage subdivision and development to avoid flood hazard risks and dam break flood hazard. We recommend that a	Support with amendments. We support this policy because it seeks to manage subdivision and development to avoid flood hazard risks and dam

	Effects > 6.16 Brightwater > 6.16.3 Policies		the NPS-NH – "natural hazard risk being defined as 'medium', 'high', and 'very high' using the risk matrix." Increased clarity about whether dam break hazard should be avoided or mitigated. For example, providing guidance about how dam break hazard could be managed, or identifying an area where no residential development is permitted to avoid the dam break flood hazard.	definition for 'significant flood hazard risks' is provided. This would increase clarity and ensure consistent decision-making. We also recommend providing more guidance on what is required to avoid the dam break flood hazard. The current wording of this policy does not make it clear whether the hazard should be managed (i.e. measures put in place to mitigate the hazard) or avoided (i.e. no development is allowed in areas exposed to the hazard). Providing more explanation would increase clarity and ensure consistent decision-making to reduce impacts to people and property.	break flood hazard. We recommend that a definition for 'significant flood hazard risks' is provided. This would increase clarity and ensure consistent decision-making. We also recommend providing more guidance on what is required to avoid the dam break flood hazard. The current wording of this policy does not make it clear whether the hazard should be managed (i.e. measures put in place to mitigate the hazard) or avoided (i.e. no development is allowed in areas exposed to the hazard). Providing more explanation would increase clarity and ensure consistent decision-making to reduce impacts to people and property.
OS67.14	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	The following amendment is made: (36) the effects of a 1 percent Annual Exceedance Probability flood event are mitigated so that any identified building location, including access ways, is not subject to inundation;	We recommend being more specific about what aspects of a building location are required to be free from inundation. For example, does this include access ways and other land? Providing more detail can increase clarity and ensure more consistent decision-making.	Support with amendments. We support these provisions because they require flood risk to be considered at subdivision stage. Protecting flood flow paths, ensuring building locations are not subject to inundation in a 1% Annual Exceedance Probability flood event, and considering the effects of mitigation on other properties are all useful ways to manage flood risk. We recommend being more specific about what aspects of a building location are required to be free from inundation. For example, does this include access ways and other land? Providing more detail can increase clarity and ensure more consistent decision-making.
OS67.15	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	The following amendment is made: Require subdivision applications to demonstrate that dam break hazard risk is managed to a clearly stated Council-adopted threshold. The assessment could include consideration of building platform location, safe access and egress, evacuation routes, warning time, residual risk, and any potential effects on neighbouring or downstream properties.	We support this provision for subdivision in the Seaton Valley Outline Spatial Plan area. Considering this hazard at subdivision stage is important to prevent increased exposure to dam break flooding and to reduce impacts to people and property. We recommend that the provision is clearer about what 'management' of dam break hazard risk requires. More specific wording would help ensure that subdivision applications demonstrate how risk has been reduced to an agreed threshold and that any residual risk is understood and manageable.	Support with amendments. We support this provision for subdivision in the Seaton Valley Outline Spatial Plan area. Considering this hazard at subdivision stage is important to prevent increased exposure to dam break flooding and to reduce impacts to people and property. We recommend that the provision is clearer about what 'management' of dam break hazard risk requires. More specific wording would help ensure that subdivision applications demonstrate how risk has been reduced to an agreed threshold and that any residual risk is understood and manageable. The following amendment is made: Require subdivision applications to demonstrate that dam break hazard risk is managed to a clearly stated Council-adopted threshold. The assessment could include consideration of building platform location, safe access and egress, evacuation routes, warning

					time, residual risk, and any potential effects on neighbouring or downstream properties.
OS67.16	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.14 Papakainga development > 16.14.2 All Zones > 16.14.2.2 Restricted Discretionary Activities (Residential, Medium Density Residential, Rural 1, Rural 2, Rural 3, or Rural Residential Zones)	Support	Retain the provision.	Building close to waterbodies can increase exposure to flooding, erosion and other hazards. Including this as a matter of discretion supports risk-informed planning and can help reduce impacts on people and property in natural hazard events.	Support 16.14.2.2(8). We support the Council restricting its discretion to consider whether the location of buildings near waterbodies may increase exposure to natural hazards or impede hazard mitigation. Building close to waterbodies can increase exposure to flooding, erosion and other hazards. Including this as a matter of discretion supports risk-informed planning and can help reduce impacts on people and property in natural hazard events.
OS67.17	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	The following amendment is made: Clarify the purpose of these setbacks. Where setbacks are for flood exposure management; require building setbacks from rivers to be informed by flood modelling and site-specific hazard information, including the 1% Annual Exceedance Probability flood event, climate change effects, erosion risk, flood flow paths, and effects on neighbouring properties.	We recommend making it clear in the plan what the purpose of these setbacks are. For example, are they for managing bank erosion, riparian planting margins, or reducing exposure to flood hazard. We support the intent of using setbacks to reduce exposure to hazards associated with rivers. However, setbacks for reducing flood exposure should be informed by flood modelling and the expected flood behaviour of the relevant rivers, rather than relying only on riverbed width. Riverbed width may not accurately reflect flood depth, velocity, erosion risk, floodplain storage, overland flow paths, or the potential effects of climate change. A modelling-based approach would better support risk-based planning and help ensure that building locations are appropriate for the actual level of hazard.	Amend 17.1A.3.1(q). We recommend making it clear in the plan what the purpose of these setbacks are. We recommend the following amendment is made: Clarify the purpose of these setbacks. Where setbacks are for flood exposure management; require building setbacks from rivers to be informed by flood modelling and site-specific hazard information, including the 1% Annual Exceedance Probability flood event, climate change effects, erosion risk, flood flow paths, and effects on neighbouring properties.
OS67.18	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	The following amendment is made: (4) The risks to persons and property from ~~flood~~ natural hazards and measures to avoid, or mitigate effects, including the matters specified in Section 106A RMA.	We support flood hazard risk being included as a matter of discretion for comprehensive development. Development can increase the number of people and buildings exposed to hazards and can also influence stormwater, overland flow paths. Tasman District is exposed to a range of natural hazards, and limiting this matter of discretion to flood hazards may not provide sufficient scope to assess and manage other relevant natural hazard risks. Expanding this to include all relevant natural hazards would better support risk-based planning and reduce the impacts of natural hazards on people and property.	Support with amendments 17.1A.3.2(4). Matters of discretion that apply to all proposals. Tasman District is exposed to a range of natural hazards, and limiting this matter of discretion to flood hazards may not provide sufficient scope to assess and manage other relevant natural hazard risks. Expanding this to include all relevant natural hazards would better support risk-based planning and reduce the impacts of natural hazards on people and property. The following amendment is made: (4) The risks to persons and property from ~~flood~~ natural hazards and measures to avoid, or mitigate effects, including the matters specified in Section 106A RMA.
OS67.19	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration >	Support	Retain the provision.	We support natural hazards being recognised as a factor that may constrain available development area or intensification opportunities. While we don't want to prevent needed development, site-specific constraints must still be considered. Development expectations	Support 17.1A.3.2 Minimum Density. We support natural hazards being recognised as a factor that may constrain available development area or intensification opportunities. While we don't want to prevent needed development, site-specific

	17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)			should not override factors that may make development unsafe, unsuitable, or difficult to manage over the long term. Recognising natural hazards as a constraint supports more risk-informed decisions.	constraints must still be considered. Development expectations should not override factors that may make development unsafe, unsuitable, or difficult to manage over the long term. Recognising natural hazards as a constraint supports more risk-informed decisions.
OS67.20	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Support	Retain the provision.	We support this matter of discretion because it recognises that encroaching into waterbody setbacks can increase the likelihood of damage to buildings, increase risk to occupants, and affect flood flows. Setbacks are a useful tool for reducing exposure to erosion and flood hazards. Considering these matters where setbacks are not met can help reduce impacts on people and property in natural hazard events.	Support 17.1A.3.2 Other setbacks. We support this matter of discretion because it recognises that encroaching into waterbody setbacks can increase the likelihood of damage to buildings, increase risk to occupants, and affect flood flows. Setbacks are a useful tool for reducing exposure to erosion and flood hazards. Considering these matters where setbacks are not met can help reduce impacts on people and property in natural hazard events.

Modus Group Limited

Submitter 68

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS68.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Support growth in Hope		Generally support the intent of PC81 to enable well-located, well-serviced residential growth in Hope
OS68.2	Proposed Plan Change No. 81 > Maps > Area Maps > 23 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	The submitters seek that Council: • Amend the PC81 planning maps and any associated structure plan, precinct, or roading pattern provisions for this area so that the indicative Collins Road extension is shown running along the shared boundary between 28 Collins Road and 45 Main Road Hope, Hope, connecting perpendicular to the 45 Main Road Hope boundary, generally in accordance with the alignment shown on the attached Subdivision Masterplan (Attachment A) and the indicative cross section at Attachment B. • Make any consequential amendments to the PC81 provisions, maps, or structure plan necessary to give effect to the relocated Collins Road extension, including as they relate to the layout, staging, or servicing of 45 Main Road Hope and 28 Collins Road.	Modus has engaged with Council regarding the future roading pattern required to service the growth area at Hope, including the proposed extension of Collins Road. Council has confirmed in writing that it sees no issue with the alternative alignment described in this submission, provided that the extension connects perpendicular to the 45 Main Road Hope boundary. Through that engagement, and through direct agreement between the submitters and the Johnston Family Trust, an alternative alignment has been identified which relocates the Collins Road extension so that it instead runs along the shared boundary between 28 Collins Road and 45 Main Road Hope, rather than through 45 Main Road Hope as currently shown. This alternative alignment is shown on the attached concept plan prepared by Surround Landscape Architects (Attachment A – Subdivision Masterplan), which illustrates a residential subdivision of 45 Main Road Hope (comprising 34 residential	The submitters oppose, in part, the current indicative alignment of the Collins Road extension shown on the PC81 planning maps, to the extent that it does not provide for the alternative alignment described in this submission.

			• Make any other consequential amendments, or grant any other relief, necessary to give effect to the intent of this submission.	lots and a block of 32 terraced dwellings, together with a reserve) served by an internal road network connecting to the relocated Collins Road extension. The reasons the submitters consider this alternative alignment should be adopted through PC81 are as follows: • **Access to 28 Collins Road:** the Johnston Family Trust, as owner of 28 Collins Road, has agreed in principle to the relocated alignment on the basis that it will create the roading access necessary to enable the future development of both 28 Collins Road and 45 Main Road Hope. • **Continued occupation by an elderly resident:** 28 Collins Road is currently the home of Mr Alex Johnston, who is elderly. The relocated alignment has been designed, with the agreement in principle of the Johnston Family Trust, so that it will allow Mr Johnston to remain living in his home for the foreseeable future, while still enabling the wider roading network to be put in place ahead of any future development of 28 Collins Road. • **Access to 45 Main Road Hope:** the relocated alignment, running along the boundary between the two properties, provides efficient and appropriately located access to enable the development of 45 Main Road Hope as shown in the attached concept masterplan, without compromising the layout or yield of that development. • **Landowner and developer agreement:** Modus, as the contracted developer of 45 Main Road Hope, has reviewed the proposed relocation of the Collins Road extension and confirms it can see no issue with the road being moved to the alternative alignment along the western boundary of 28 Collins Road. • **Council engagement and written confirmation:** Council officers have confirmed in writing that they see no issue (in theory) with the relocated alignment, subject to the extension connecting perpendicular to the 45 Main Road Hope boundary and to seeing a finalised plan. This confirms that the alternative alignment sought in this submission is achievable from an engineering and roading design perspective, and is consistent with Council's own assessment of the roading pattern required to service this growth area.	

				• **Efficient use of infrastructure and coordinated development:** aligning the road along the shared boundary allows both properties to be developed in a coordinated manner and avoids the need for the road to bisect 45 Main Road Hope, which would otherwise constrain the efficient subdivision of that site. • **Cost-sharing arrangement supporting the Johnston Family Trust's consent:** in return for the Johnston Family Trust's agreement in principle to the road being repositioned onto land associated with 28 Collins Road, the Sutton family has agreed to meet the cost of constructing the relocated Collins Road extension and of providing services (including water, wastewater, and stormwater connections as required) to those lots of 28 Collins Road that will front the extension. This arrangement removes what would otherwise be a significant cost barrier to the Johnston Family Trust enabling the relocated alignment, and reflects the collaborative approach the submitters have taken to achieving an efficient roading outcome for the wider area. • **Long-standing expectation as to alignment:** the alignment of the Collins Road extension along the boundary between the Johnston Family Trust's land and the Sutton family's land reflects an alignment that has, for decades, been understood by the Johnston Family Trust to be the likely location of any future road extension. This long-standing expectation has informed the Johnston Family Trust's own future development planning for 28 Collins Road, and the relief sought in this submission is consistent with, rather than a departure from, that longstanding position. • **Land acquisition to give effect to the alignment:** Modus is currently concluding negotiations to acquire from the Johnston Family Trust the strip of land along the boundary required to construct the relocated Collins Road extension. This will place the land required for the extension directly in Modus' ownership, providing certainty that the alignment sought in this submission can be constructed and vested without reliance on a third party. • **Preservation of privacy and amenity at 28 Collins Road:** locating the extension along the boundary, rather than through the middle of 45 Main Road Hope, better preserves the privacy and amenity currently enjoyed at	

				28 Collins Road in the period prior to that property being developed, by keeping the new road and any associated traffic, lighting, and activity away from the immediate vicinity of the existing dwelling occupied by Mr Johnston. • **Avoiding premature fragmentation of the Johnston Family Trust's land:** acquisition of the boundary strip by Modus enables both the construction of the Collins Road extension and the development of 45 Main Road Hope to proceed, without requiring the balance of the Johnston Family Trust's land at 28 Collins Road to be broken up into multiple parcels in the short term. This allows the Johnston Family Trust to retain the remainder of its land intact and to make its own decisions about the timing and form of any future development, rather than having that land fragmented as a consequence of the roading pattern chosen for the wider area. The submitters consider that adopting the alternative alignment better achieves the purpose of PC81 to enable well-located residential growth that is supported by the affected landowners, and results in a more efficient roading and subdivision pattern than the alignment currently shown on the notified planning maps.	

Karen Mackey

Submitter 69

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS69.1	Proposed Plan Change No. 81 > Maps	Oppose	To delete and completely remove the requirement of the “Road Traffic Noise Overlay” provisions in Plan Change 81 and as shown on Map 80-15 19 June 2026 (and other maps) for Richmond’. See original submission for more details. Karen has a lot of questions about how the overlay was developed.	My submission detailed below related to the Noise Overlay Provisions proposed for Richmond includes consideration of: • Electric Vehicles • Low Noise or Silent Tyres • Road Construction • Vehicle Gas and Emission Levels • Notification and Impact on Affected Land Owners • Road Noise Mitigation • Benefits of New Noise Overlay • Hill St Overlay • NZS 6806 and Road Noise Measurement	Oppose requirement of 'Road Traffic Noise Overlay' provisions in Plan Change 81 and as shown on Map 80-15 and other maps for Richmond

Susan McEnroe

Submitter 70

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS70.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 41 - Proposed PC81 - Zone - Motueka, McBrydie Rd	Amend	At present the extension falls short of the land at 479 Motueka Valley Highway. I believe we would be better served in extending the zone to include this property.	The land is Separation Granite and was previously forestry. It was never replanted and is now covered in wildling pines. The ground is unsuitable for production and therefore ideal for rural residential purpose. As such it would help eliminate the spread of wildling pine and provide much sort after land for lifestyles within 10 minutes of Motueka.	Proposed extension of rural residential zoning in the lower Motueka Valley to include 479 Motueka Valley Highway.

Mick Toll

Submitter 71

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS71.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 34 - Proposed PC81 - Zone - Mapua, Higgs Rd	Support	Retain update zone map 80-32 as drafted.	Rezoning is consistent with changes to the TRPS, and the intention of Plan Change 81 to ensure sufficient and well-located residential land for housing growth.	Support rezoning of 119 and 109 Aranui Road from Rural Residential deferred Residential to Medium Density Residential.
OS71.2	Proposed Plan Change No. 81 > Maps > Area Maps > 03 - Proposed PC81 - Area - Mapua, Aranui Rd	Oppose	Delete Road Traffic Noise Overlay from update Area Map 80-03.	Provisions related to this overlay place unnecessary cost onto applicants to address low-level risks of reverse sensitivity effects for Council, on low-speed roads.	Oppose introduction of the Road Traffic Noise Overlay to Update Area Map 80-03
OS71.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Oppose	Delete provision 16.3.3A.2 (j) and any associated matters for discretion.	This provision places unnecessary cost onto applicants to address lowlevel risks of reverse sensitivity effects for Council, on low-speed roads.	Oppose introduction of Controlled subdivision condition (16.3.3A.2 (j)) requiring acoustic assessment to accompany application for subdivision in the MDRZ where within the Road Traffic Noise Overlay.
OS71.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	This provision (17.1A.3.2 (t)) places unnecessary cost onto applicants to address lowlevel risks of reverse sensitivity effects for Council, on low-speed roads.	Delete provision 17.1A.3.2 (t) and any associated matters for discretion	Oppose introduction of Restricted Discretionary condition (17.1A.3.2 (t) requiring acoustic assessment to accompany application for Comprehensive Development in the MDRZ where within the Road Traffic Noise Overlay.
OS71.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Oppose	Delete provision 5.2.3.8A.	This provision (5.2.3.8A) places unnecessary cost onto applicants to address lowlevel risks of reverse sensitivity effects for Council, on low-speed roads.	Oppose introduction of the policy 5.2.3.8A relating to road noise.

Stanley Wayne Mackey

Submitter 72

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS72.1	Proposed Plan Change No. 81 > Maps	Oppose	Reject in total the proposed amendments to introduce a Noise Overlay as proposed by Plan Change 81	The proposal appears to adopt the philosophy that residents should simply "build around" increasing traffic noise through insulation, specialised glazing and mechanical ventilation. This approach represents a significant shift away from preventing environmental effects at their source. Rather than reducing noise generated by transport infrastructure, the proposal effectively accepts increased external noise levels and transfers responsibility for mitigation onto existing individual landowners and homeowners. This is inconsistent with the principles of sustainable management and unnecessarily diminishes residential amenity. The proposed provisions effectively transfer the financial burden of managing traffic noise from those generating the effects to existing individual property owners. See original submission for furhter details. Wayne has provided a lot of background information.	Opposes the proposed noise overlay in Richmond

Julie Aitken Brett Harraway

Submitter 74

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS74.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga. Refer to original submission for more information	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga. Support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga.
OS74.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision. we ask the Council to keep Redmill Road as a cul-de-sac, to provide any connectivity to the new development as a walking/cycling path rather than a road, to require a full site-specific assessment of effects before any vehicle connection to Redmill Road could be relied upon, and to support instead a direct Stringer Road–La Mer View connection. Detailed relief is set out in section 8 of the submission. Refer to original Submission for more information	Adverse effects on the existing community and environment - A through-connection would convert Redmill Road from a quiet no-exit road into a through-route – a potential "rat run" for properties on upper Redvale Road and the new development on La Mer View Road for traffic coming and going from the westerly direction. It would introduce adverse traffic, noise and safety effects on approximately 20 existing households for no benefit the network does not already have – a poor and inequitable distribution of effects. - Redmill Road is not formed or designed to carry through-traffic. It has private driveways, and is used informally by residents, children and pets for walking and leisure. Introducing through-traffic creates a real and unnecessary safety risk. - The change would erode the established rural-residential amenity and character of the area – directly relevant under RMA sections 7(c) and 7(f). Inconsistency with the Council's own consent notice and objectives - The character of the Galeo Estate is not a private preference. It was imposed and registered by the Tasman District Council itself, through Consent Notice 11141705.5 (issued under section 221 of the RMA as a condition of subdivision consent RM 080969). That consent notice requires, among other things: outdoor lighting restricted to hooded or shrouded fittings directing light downwards and mounted no higher than 900 mm – a dark-sky regime (cl f); no fencing on any lot except low post-and-wire or visually-permeable safety fencing (cl g); landscape-integrated buildings in recessive colours (cls b–c); stormwater managed by gravity to natural gullies, with permeable surfaces and reduced runoff (cl k); and no further subdivision of the	Oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road (site T-226) and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision. Remove indicative road. If connectivity required then a walking and cycling path. Alternatively a connection to Le Mer View. Refer to original Submission for more information

				lots (cl m). - A lit, kerbed, signed vehicular through-road – with headlight sweep at night, traffic signage, and a large sealed surface shedding concentrated stormwater – is fundamentally inconsistent with the dark, open, low-light, landscape-led, low-density environment the Council itself required and registered against these titles. The Council cannot coherently require residents to mount lights below 900 mm and forgo fences “to protect amenity”, while routing a lit connector road through the same community. - The Council's own reserve planning treats Redmill Road as a walking environment: the Moutere-Waimea Ward Reserve Management Plan establishes a Redmill Road Walkway Reserve (Map 21). Routing diverted through-traffic onto Redmill Road is fundamentally at odds with the pedestrian and recreational use the Council itself has designated here. - The connection is also inconsistent with Plan Change 81’s own amended objective 11.1.2 (a fully integrated, multi-modal transport system). It serves private vehicles, not active modes, and degrades a currently safe and walkable local road. Section 32 and value for money - A new sealed connector road of this kind – requiring earthworks on steep topography and, in all likelihood, land acquisition – would be significant expenditure for a connection that, as set out above, adds nothing the network does not already have. It is not the most appropriate method to achieve the relevant objectives (RMA section 32). The Council's section 32 alternatives evaluation assessed zoning options only; it did not evaluate alternative road alignments, so the connection has not been tested against the “most appropriate method / reasonably practicable options” standard. - The Council’s own evaluation records that T-226 performs poorly against the wider growth strategy and is supported on cultural grounds. Significant roading investment to integrate this site into the wider network is therefore not strategy-driven, and is poor value for money at a time of acknowledged budget constraint – particularly where existing local infrastructure, including the area's own walking network, is itself under-maintained. - The Infrastructure Report classifies the site as infrastructure-neutral, with developer-led onsite servicing and “no reticulated network delivery dependency”. There is accordingly no servicing need that requires this road. Refer to original Submission for more information	
OS74.3	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.2 Objectives	Support	Support rezoning of T-226 and support aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information	We do not oppose papakāinga development on ancestral land. Refer to original submission for more information	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information

Will Rickerby

Submitter 75

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS75.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 46 - Proposed PC81 - Zone - Richmond South	Oppose	Delete the proposed Medium Density Residential zoning from the Chelsea Avenue/Wilkinson Place site. Retain the existing zoning until it can be demonstrated that development can occur without significant adverse effects on transport, infrastructure, stormwater management, residential amenity and landscape character.	oppose the proposed rezoning of the Chelsea Avenue/Wilkinson Place site because it is inconsistent with the planning outcomes sought through both Plan Change 81 and the emerging Tasman Environment Plan (TEP). The TEP promotes development that is responsive to the natural characteristics and constraints of a site, protects residential amenity, is supported by appropriate infrastructure, and contributes to well-functioning urban environments. The Chelsea Avenue/Wilkinson Place site does not satisfy these outcomes. Specifically, the proposal is inconsistent with the TEP's planning direction because: The site is physically constrained by steep topography. The scale of earthworks, retaining structures and land modification required to accommodate multi-level housing is inconsistent with the TEP's objective of ensuring development responds appropriately to natural landforms and avoids or minimises adverse environmental effects. Infrastructure and transport capacity are inadequate. The TEP promotes urban growth that is integrated with transport infrastructure and servicing. Access to this site is via constrained local roads that were designed for low-density residential development. Intensification at this location will place unacceptable pressure on the transport network, increase traffic movements, a one way street with parked cars on either side of Chelsea Avenue, so increases road safety and compromises emergency vehicle access. Residential amenity will be significantly diminished. Multi-storey development on elevated land will result in overlooking, loss of privacy, loss of morning sunlight, overshadowing and visual dominance over adjoining properties. These effects are contrary to the TEP's direction to maintain and enhance residential amenity and ensure compatible built form within established neighbourhoods. Stormwater and natural hazard risks have not been adequately addressed. Increased building coverage and extensive earthworks on steep land will increase stormwater runoff and place greater pressure on existing drainage infrastructure. The TEP seeks development that manages natural hazards and avoids transferring adverse effects to	Opposes the proposed Medium Density Residential zoning of the Chelsea Avenue/Wilkinson Place site and seeks retention of the existing zoning.

Susie and John Wendelborn

Submitter 76

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS76.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Reject development changes proposed under Plan Change 81 that would alter the character of Mapua.	1. Māpua is an iconic coastal village which will completely lose its character under Plan Change 81, as submissions opposing the Māpua Masterplan highlighted. 2. The developments proposed by developers, which are aimed at providing expensive-to-buy, low-cost material homes with no character, will only provide Council with a small economic return compared to the significant ongoing infrastructure costs to ratepayers. There is no shortage of existing homes for sale in Māpua and the surrounding area. 3. These development proposals have parallels to the Arrowtown housing development, which the community claims will choke roads, harm local tourism, and ultimately be a folly of history. 4. The Future Development Strategy includes restrictions on zoning changes to productive farmland. These restrictions should remain to allow New Zealand's red meat markets, including recently secured export markets, to be supplied from productive farmland rather than having that land converted to housing. Loss of productive farmland may also affect the affordability of red meat for consumers. 5. Continuing urban sprawl into rural productive farmland reduces the incentive and requirement to make better use of existing urban areas through intensification. 6. The movement of subdivisions onto hills compounds these issues. Brightwater experienced significant damage during the 2025 flooding event, and subdivisions have been developed across highly productive former dairy farmland. While Brightwater is bounded by two rivers and Māpua has a coastal setting, there are similarities between the situations. 7. At the 13 July 2026 Māpua & Districts Community Association meeting, a local traffic engineer and transportation planner stated: "We do not want another Berryfields." 8. There are real concerns about accessibility for traffic to move out of affected areas in the event of an emergency. This also includes fire risk where there are no exit roads and where pine trees remain. Recent fires in France and Spain have demonstrated the intensity of fires involving pine forests.	Opposes Plan Change 81 on the basis that it will change the character of Mapua.

Phil Smith

Submitter 77

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS77.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 43 - Proposed PC81 - Zone - Murchison	Amend	Oppose the proposed re-zoning of T-234 and T-150. Amend the boundaries of the proposed sites as shown on map attached to submission. Refer to original Submission for more information.	Concerned that permitted activities and or developments associated with the proposed zonings would compromise the value and visual amenity of existing adjacent Residential properties located on the boundaries of the proposed sites. Refer to original Submission for more information.	Oppose the proposed re-zoning of T-234 and T-150 (currently zoned residential) to either/or commercial/light industrial. Concerned that permitted activities and or developments associated with the proposed zonings would compromise the value and visual amenity of existing adjacent Residential properties located on the boundaries of the proposed sites. Seeks that Council amends the boundaries of the proposed sites as shown on map attached to submission. Refer to original Submission for more information.

Waimea South Historical Society Inc

Submitter 78

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS78.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 61 - Proposed PC81 - Zone - Wakefield Central	Oppose	Recommend that TDC recognises the central area of Wakefield bounded by Edward St, Whitby Way, Arrow St and the Western side of Pitfure Road as an Historic precinct and should be set aside from Plan Change 81. Refer to original submission for more information including photos.	We do not agree with the overall concept which looks to change the "Village of Wakefield" into just a more efficient use of land with different housing types. Concern re: Village character and atmosphere and infrastructure (drainage, sewage and water connections). Refer to original submission for more information including photos.	The change from Residential to the new Medium Density Residental Zone proposed for Wakefield in Map T-29a and T-30 - Recommend that TDC recognises the central area of Wakefield bounded by Edward St, Whitby Way, Arrow St and the Western side of Pitfure Road as an Historic precinct and should be set aside from Plan Change 81.
OS78.2	2-Out of Scope	Amend	Seek a process for property owners to be able to protect their heritage property at a district level. The Heritage Advisor role is essential. And updating District Plan. Refer to original submission for more information including photos.	There is one at National level which some of our buildings in this area are part of. But more is needed in the way of advice, documentation and help for these local homeowners. The Heritage Advisor role is essential. Refer to original submission for more information including photos.	Seek a process for property owners to be able to protect their heritage property at a district level.
OS78.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	On-section Parking is essential for our residents. The streets cannot accommodate the number of vehicles requiring the ability to park that this Plan Change 81is recommending. Refer to original submission for more information and photos.	Wakefield is above the national average of those using their vehicles to get to work. Refer to original submission for more information and photos.	Plan Change 81 has the potential to change the local character and historical value of the VILLAGE of Wakefield, damage community connections and cohesion and alter its family friendly, safe environment. ANY developer is not required to provide parking on the section (Plan Change 76), or required to notify interested parties of the development and already street parking is at a maximum.
OS78.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.17 Wakefield > 6.17.1 Issues	Amend	Issue 6.17.1 does not mention the recognised historic heritage that is Wakefield – the first inland settlement in the South Island and the second in NZ.	Historical heritage values of Wakefield. Refer to original submission for more information.	Issue 6.17.1 does not mention the recognised historic heritage that is Wakefield – the first inland settlement in the South Island and the second in NZ.
OS78.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.17 Wakefield > 6.17.1 Issues	Oppose	Unspecified. Refer to original submission for more information.	Wakefield has the only lowland native forest in the region surrounding the township, which is another tourist attraction.	Great Taste Trail Cycle - This also ties in with the Historic and Heritage value of the township of Wakefield. It's history attracts visitors from around NZ and the world.
OS78.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.17 Wakefield	Amend	Incorrect statement in integrated traffic assessment regarding bridges and concern regarding simplification of statement regarding flooding. Comments relevant to sections 5.5.1.1, 5.5, 11.1.3.3, 11.1.3.12, 11.1.3.13. Refer to original submission for more information.	There is a one lane bridge on Higgins Road across the Pitfure Stream. This is an incorrect statement (reference 5.5.1.1). There are 4 one lane bridges on Higgins Road Statement 5.5 of the Integrated Transport Assessment really simplifies the reality of the situation, there are 10 –12 plus houses that could be flooded and would	Comments regarding the Wakefield Higgins Road Integrated Traffic Assessment specifically sections 5.5.1.1, 5.5, 11.1.3.3, 11.1.3.12, and 11.1.3.13.

				also need to be raised to accommodate the raising of Higgins Road to avoid the flooding. Statements also relevant to11.1.3.3, 11.1.3.12, 11.1.3.13. Refer original submission for more information.	

Brad Watts

Submitter 79

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS79.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Delete or prohibit any proposed, indicative, or future road connection that would join onto Redmill Road or convert Redmill Road (or the streets that feed into it) into a through-road.	The submitter states that Redmill Road is currently a quiet residential street with no through-traffic and that a new connection would increase traffic, reduce safety and change the existing character of the street.	Opposes any road connection between the proposed development area and Redmill Road.

Barry Dowler

Submitter 80

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS80.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 38 - Proposed PC81 - Zone - Motueka Central	Amend	Delete "deferred Residential with compact density residential area" T-190a.	I oppose the possible change of area T-190a from Zoned Tourist Services deferred residential with compact density residential area. For those who follow what has happened in Motueka, it must be a concern to see the dwindling amount of Motels available due to being sold to others for employee accommodation. Used for RSE workers Horticulture and factory staff in the fishing industry. Just before Christmas 2025 we lost the major motel complex on King Edwards Street, the only one which could properly cater for tourist buses. We need area T-190a and possibly T-190b to be zoned Tourist Services for future developers or they will have to go through the major expense of purchasing house sites, demolishing and clearing the sites then hopefully getting the sites rezoned to Tourist Services. Refer to original submission for more information.	Oppose in part. I oppose the possible change of area T-190a from Zoned Tourist Services deferred residential with compact density residential area. Delete "deferred Residential with compact density residential area" T-190a.

Katie-Jane Willloughby

Submitter 81

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS81.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Decline the proposed high-density and medium-density residential provisions affecting our village.	The submitter states that increased residential density would fundamentally change the village character and identity and may result in increased traffic congestion, pressure on infrastructure and services, reduced privacy, loss of green space, and decline in village atmosphere.	The submitter opposes the proposed high-density and medium-density residential development provisions and seeks retention of a low-density village environment.
OS81.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	Retain planning provisions that protect the existing village character and low-density environment.	The submitter states that people choose to live in the village because of its open space, established character and strong sense of community, and does not support planning provisions that encourage high-density or medium-density housing.	The submitter seeks retention of planning provisions that protect Māpua's village character, identity and low-density environment.
OS81.3	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Amend	Give greater weight to maintaining amenity values, open space, heritage values, and the distinctive village character when considering future urban growth.	The submitter considers that increased density would reduce privacy, reduce green space and diminish the village atmosphere valued by residents.	The submitter seeks greater protection of amenity values, open space, privacy and village atmosphere when considering future growth.
OS81.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Amend	Ensure any future growth is supported by adequate infrastructure and occurs at a scale that preserves the community's identity.	The submitter states that infrastructure, transport, water, wastewater, stormwater and community facilities should be planned and delivered before significant increases in housing density are enabled.	The submitter seeks to ensure future growth is supported by infrastructure and occurs at a scale that preserves community identity.
OS81.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	Future planning should prioritise low-density development that is consistent with the existing built environment and protects the qualities that make the community an attractive place to live.	The submitter considers development should respect the existing scale and character of the community and avoid transforming the village into a town or urban centre.	The submitter seeks future growth to occur gradually and at a scale that preserves Māpua's community identity.

Martin Keefe

Submitter 82

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS82.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 34 - Proposed PC81 - Zone - Mapua, Higgs Rd	Oppose	I oppose the development of medium density housing in Mapua and specifically on the land between Aranui Road, Higgs Road and Jessie Street.	To expand Mapua with medium density housing, and dwellings up to 8m high on small sections, would impose a significant change to the character of a village that the current residents have either been born into or bought into, expecting in good faith that the lifestyle and the ambience they have sought was not going to be taken away. The hillside location between Jessie Street and Higgs Road is	I oppose the development of medium density housing in Mapua and specifically on the land between Aranui Road, Higgs Road and Jessie Street. Refer to original submission for more information.

				particularly unsuitable for such development. Due to the sloping ground apartment blocks will tower rather more than 8m above properties in front. Single story houses behind them will get little sunlight or view. Refer to original submission for more information.	
OS82.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	Oppose the development of medium density housing in Mapua and specifically on the land between Aranui Road, Higgs Road and Jessie Street. I can see the need for medium density housing in the district but I don't think Mapua is suitable.	To expand Mapua with medium density housing, and dwellings up to 8m high on small sections, would impose a significant change to the character of a village that the current residents have either been born into or bought into, expecting in good faith that the lifestyle and the ambience they have sought was not going to be taken away. The hillside location between Jessie Street and Higgs Road is particularly unsuitable for such development. Due to the sloping ground apartment blocks will tower rather more than 8m above properties in front. Single story houses behind them will get little sunlight or view. If there has to be development there the hillside is much better suited to larger sections and single story properties aimed at families. The area is within easy walking or cycling distance of the school and not far from the playing fields for recreation. Jessie Street on the other hand, is quite unsuitable as a thoroughfare due to blind bends with parked cars and a difficult exit onto Higgs Road. It is particularly difficult for cyclists to negotiate because of the steep ramp into the Higgs Road junction - it is hard to get uphill, and downhill it is very fast around the aforementioned blind bends, and parked cars and across driveways. Pedestrians only have a narrow pavement on one side and have to cross Higgs Road at the top to access the pavement to the village, then cross back again half way down. I can see the need for medium density housing in the district but I don't think Mapua is suitable. Medium density housing, aimed at people wanting small 1-2 bedroom units, should ideally be on flat land close to adequate local services, allowing access by walking or cycling, or indeed mobility scooters. By adequate local services I mean schools, medical services, a range of utilitarian local shops (not just tourist shops), a post office, banking, local jobs, sports and entertainment facilities. Unfortunately, Mapua does not have adequate services, unlike Richmond or Motueka for example, or adequate public transport links to those centres, making regular car driving a necessary evil. However, I can understand why people want to join us living in Mapua, or be enabled to continue living here as their	Oppose in part. I oppose the development of medium density housing in Mapua and specifically on the land between Aranui Road, Higgs Road and Jessie Street. I can see the need for medium density housing in the district but I don't think Mapua is suitable. Reasons listed below, refer to original submission for more information • Loss of village character • Lack of easy walking and cycling access (particularly around the Higgs road / Jessie street section). • Inadequate local services eg schools, medical services, a range of utilitarian local shops (not just tourist shops), a post office, banking, local jobs, sports and entertainment facilities.

				circumstances change. I'm not against that per se. However there has to be careful consideration of the impact on the village of medium density housing, how it will be affected by changing demographics, and the facilities required to enable everyone to live comfortably and harmoniously. Expanding Mapua with inappropriate development will change the village for the worse and mean those who live here now will lose what they have and the new residents will not find what they expected to find. Refer to original submission for more information.	
OS82.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Oppose medium density housing up to 8m In Māpua particularly the hillside location between Jessie Street and Higgs Road.	The Jessie Street and Higgs Road area is particularly unsuitable due to the sloping ground apartment blocks will tower rather more than 8m above properties in front. Single story houses behind them will get little sunlight or view. Refer to original submission for more information.	Oppose in part. Oppose in Māpua Medium Density Residential development up to 8m. To expand Mapua with medium density housing, and dwellings up to 8m high on small sections, would impose a significant change to the character of a village that the current residents have either been born into or bought into, expecting in good faith that the lifestyle and the ambience they have sought was not going to be taken away. Refer to original submission for more information.

Elspeth Collier and Kim Bowie

Submitter 83

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS83.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	1. That Policy 6.15.3.18 be refused as notified, and the words 'including where capacity is constrained' be deleted; and 2. That the Mapua Integrated Transport Assessment be redone to: (a) separately model local-destination and service trips to the wharf, medical centre, fire station, grocery store and school, including trips by residents outside the village perimeter; and (b) model the effect of a Stafford Drive closure scenario on Mapua Drive and the SH60/Mapua Drive intersection; and 3.That a funded plan for preserving safe, efficient access to the Mapua Wharf, medical centre, fire station, and grocery store via Aranui Road, including adequate cycle infrastructure, be required before further development is permitted; and	The submitter considers the wording unacceptable because it permits development despite constrained infrastructure capacity. They state the SH60/Mapua Drive intersection is already high-risk, Mapua's role as a service town has not been assessed, traffic modelling is incomplete, the risk of Stafford Drive closure has not been tested, and access to essential services via Aranui Road is not protected. They also state they are personally affected due to living near the intersection and operating a tourist accommodation business reliant on safe access to Mapua Wharf.	The submitter opposes Policy 6.15.3.18 because it allows residential development to proceed even when wastewater, water supply, stormwater, and transport infrastructure capacity is constrained, particularly the transport network.

			4.That no further residential development relying on the SH60/Mapua Drive intersection or Aranui Road be permitted to proceed until points 2 and 3 above are addressed and any resulting safety and capacity upgrades have been completed		
OS83.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	1. That a cumulative traffic and infrastructure assessment be undertaken, combining Plan Change 81's approximately 1,300 dwellings with the approved and applied-for developments listed above, before the Council can conclude that Policy 6.15.3.18's threshold of avoiding 'significant adverse effects' will be met; and 2.That no further residential development relying on the SH60/Mapua Drive intersection or Aranui Road be permitted to proceed until that cumulative assessment has been completed and any resulting safety and capacity upgrades have been implemented and completed	The submitter states that more than 200 additional dwellings outside the Masterplan area rely on the same constrained road network, yet these are not included in the modelling. They consider that without cumulative assessment, the true scale of future traffic cannot be understood. They also state they are personally affected due to proximity to SH60/Mapua Drive and reliance on Aranui Road for essential services and business operations.	The submitter opposes Policy 6.15.3.18 in part because the traffic and infrastructure assessments do not include cumulative effects from multiple approved or proposed developments outside the Mapua Masterplan area.

Sandie Hutchinson

Submitter 84

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS84.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 54 - Proposed PC81 - Zone - Korere-Tophouse Rd	Oppose	No subdivision of Korere-Tophouse Road sites	We bought our property to live rurally and not be directly opposite multiple houses. This may impact our standard of living noise impacts, rubbish impacts, smoke from outdoor fires, and devalue our property. We chose to live rurally - having moved from cities.	Oppose the intensification of Korere-Tophouse Road
OS84.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules	Oppose	Impose covenants on any subdivided properties in the area e.g. building must be completed within a short period of time to a certain standard, with limited number of buildings, on each site.	This is to ensure we do not live opposite 'shacks' or 'caravan type living with potential multiple families/persons living on one site. We have not been notified of how many potential sites there will be within the undesired subdivision.	Oppose dense living situations in rural areas
OS84.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules	Oppose	Avoid creating additional strain on Kikiwa Substation	there is currently an issue with limited power availability from Kikiwa Substation - with more potential houses this may very well impact our ability to access power (never mind those further up the road).	Oppose creating additional need for power supply in rural areas
OS84.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 54 - Proposed PC81 - Zone - Korere-Tophouse Rd	Oppose	Avoid potential subdivided sites accessing their driveways from a 100km road	off Korere Tophouse Road which is a 100km zone - causing potential accidents to occur due to increased number of driveways. There is already a high number of vehicle accidents at this location.	Oppose creating multiple driveways into a 100km road
OS84.5	2-Out of Scope	Oppose	Avoid subdivision without the right infrastructure	There is no water supply or wastewater available at this site - what infrastructure will be put in place for this?	Opposes creating additional pressure on water and wastewater services in the area
OS84.6	Proposed Plan Change No. 81 > Chapter 7: Rural Environment Effects	Oppose	We are completely opposed to this land being subdivided	there are houses for sale in St Arnaud, and rentals, which have been available for some time so there is ample opportunity for families/people to move into the village without creating additional sites located 7km out of St Arnaud village.	We see no benefit to the local community of this subdivision being approved

Chip Felton and Michelle Lang

Submitter 85

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS85.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	DELETE the Māpua rezoning provisions.	The stated reason for preferring Option 4 (Appendix 28 of Section 32 Report) is strategic rather than infrastructural. Option 3 (Future Urban Zone) would have protected the same land for future urban use without conferring immediate development rights, and was rejected only because it "relies on downzoning and is unlikely to be implemented in practice. Refer to original submission (reference lodgement) for more information.	OPPOSE — the scale of rezoning is not supported by demand or capacity.
OS85.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	• AMEND to insert an express infrastructure-trigger rule for Māpua, making subdivision and land use consent conditional on written confirmation from Council that network capacity exists for the proposed yield. • AMEND to apply deferred zoning to all Māpua Category B1 and B2 sites, including T-237a, T-237b, T-237d, T-238a, T-238b, T-240a, T-240b and T-246b, which presently carry none. • AMEND so that deferrals are not lifted until Long Term Plan projects 96013 and 86027 are delivered and commissioned.	The Infrastructure Report concludes at page 136 that "growth in Māpua should be managed through sequencing, infrastructure triggers, and confirmation of capacity before development proceeds at scale". PC81 contains no such triggers. Deferred zoning is applied to only 8 of the 17 Māpua residential sites listed in Table 28.1. Refer to original submission (reference lodgement) for more information.	OPPOSE — All Māpua Category B1 and B2 sites; proposed TRMP Chapter 6.15; the deferred zoning framework as applied in Māpua. PC81 omits the sequencing controls the Councils own evidence calls for.
OS85.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	• AMEND so that the Māpua provisions do not take effect until the commissioned SH60 / Māpua Drive traffic assessment is completed and publicly reported, and NZTA Waka Kotahi has confirmed a funded intersection upgrade. • AMEND to incorporate as rules the trigger-point assessments the Infrastructure Report recommends for pedestrian and cycle facilities and for intersection upgrades. • AMEND to require a cumulative transport and wastewater assessment that includes	Appendix 28, PDF page 269, records that the Council's Transportation Planner "has advised that there may be a limit to how much further development can be accommodated in Mapua", that accidents have increased in recent months, and that a detailed intersection assessment was still being commissioned when PC81 was notified. Refer to original submission (4 and lodgement) for more information.	Māpua transport network; the SH60 / Māpua Drive intersection; the Seaton Valley Outline Spatial Plan - OPPOSE — traffic effects are severe and the Council has flagged a possible development ceiling.

			consented development outside the Māpua Masterplan boundary.		
OS85.5	Proposed Plan Change No. 81 > Maps	Oppose	• DELETE the Commercial zoning at T-242 and T-248 and the Light Industrial zoning at T-244, and REPLACE with Open Space, Recreation or Rural 1 zoning. • AMEND so that all Māpua coastal-plain sites are reassessed under the 2024 Ministry for the Environment Coastal Hazards and Climate Change Guidance, and the Council's adaptive planning strategy is completed, before further coastal upzoning is confirmed.	Appendix 17 finds relative sea-level rise at Māpua of 1.95 m by 2130, and that "the majority of the coastal plain east of Stafford Drive and Aranui Road will be at or below the level of the high tide". Refer to original submission (5 and lodgement) for more information.	T-242 (150 Māpua Drive); T-248 (5 Seaton Valley Road); T-244 (18 and 34 Stafford Drive) - OPPOSE — urban zoning is proposed on land the Council maps as below high tide.
OS85.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	DELETE the Māpua provisions. In the alternative, • AMEND so that PC81 is assessed against the Waimea Inlet Management Strategy 2050 under section 74(2)(b)(i) of the Act — including whether the proposed zoning forecloses the landward migration of salt marsh contemplated by Objective 5.1 — with the assessment reported before the Māpua provisions are confirmed. • AMEND to require a catchment-scale ecological assessment of the cumulative sediment, stormwater and wastewater effects of PC81 on Waimea Inlet.	The Council endorsed that Strategy on 24 August 2023 and states that it "guides decision-making across Council, influencing statutory resource management". Section 74(2)(b)(i) of the Act requires the Council to have regard to it. The section 32 report relies on that same provision to bring the Māpua Masterplan into PC81. Refer to original submission (6 and lodgement) for more information.	OPPOSE — PC81 conflicts with the Council's own Waimea Inlet Management Strategy and never mentions it.
OS85.7	Proposed Plan Change No. 81	Oppose	• AMEND to include enforceable indigenous revegetation and restoration provisions in the Māpua development areas, namely: (a) that the 20-metre esplanade reserve PC81 already requires along Seaton Valley Stream be planted in locally sourced indigenous species, with an equivalent margin on its tributaries and the Stafford Drive Drain; (b) minimum indigenous planting standards in the Medium Density Residential Zone and in all Outline Spatial Plan open space and reserve areas; (c) retention and protection of the mature vegetation identified at T-238, T-239, T-247 and T-250 and along Māpua Drive; (d) fish passage and sediment control standards for all works in the Seaton Valley catchment;	Neither the National Policy Statement for Indigenous Biodiversity nor section 6(c) of the Act appears anywhere in the section 32 report, the Site Assessment Report or the Infrastructure Report. The three-year suspension of significant natural area identification under section 78 of the Act does not extend to those obligations. Refer to original submission (7 and lodgement) for more information.	OPPOSE — PC81 forgoes an irreplaceable opportunity to improve a degraded environment - Seaton Valley Stream, protection of mature vegetation at T-238, T-239, T-247 and T-250 and Seaton Valley Catchment.

			(e) amendment of Method 5.2.20.3(c) to specify locally sourced indigenous species and to extend beyond street corridors to riparian margins and reserves. • AMEND to bring the ecological restoration commitments of the Māpua Masterplan within the scope of PC81.		
OS85.8	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Amend	• AMEND Objective 5.2.2 to indicate how its two limbs are to be reconciled where an established low-density settlement is also an area planned for intensification, or insert a Māpua-specific amenity objective to that effect. • AMEND to require a qualified landscape and visual effects assessment for the Māpua Medium Density Residential areas, in particular the Seaton Valley slopes (T-33) and the Higgs Road ridge. • AMEND to defer the Māpua provisions until Plan Changes 82 and 83 are notified. • AMEND to require public notification of Medium Density Residential applications on ridgeline and coastal-margin sites in Māpua.	Amended Objective 5.2.2 retains the maintenance and enhancement of amenity values while also recognising that amenity values in areas planned for intensification develop and change over time. It gives no direction as to which limb prevails where they conflict. Māpua is both an established low-density settlement and, under PC81, an area planned for intensification. Refer to original submission (8 and lodgement) for more information.	Amended Objective 5.2.2 retains the maintenance and enhancement of amenity values while also recognising that amenity values in areas planned for intensification develop and change over time. It gives no direction as to which limb prevails where they conflict. Māpua is both an established low-density settlement and, under PC81, an area planned for intensification.
OS85.9	Proposed Plan Change No. 81 > Maps	Support	RETAIN these provisions as notified.	These provisions reduce development pressure on Māpua's most vulnerable land and should be retained. Refer to original submission (9 and lodgement) for more information.	We support the rezoning of Kite Park (T-235a andT-235b) to Recreation, T-241 to Open Space, T-249to Rural 1, T-237e and T-237f to Open Space, and the Rural 1 component of T-238c; the retention of existing zoning at T-247; and the 8-metre height limit applied in Māpua to maintain village character.

John Emanuel

Submitter 86

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS86.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 50 - Proposed PC81 - Zone - Richmond, Eyles Rd	Support	I live adjacent to block T114A (across the road from Silvan Place)which has been scheduled to change plan from Rural 2 to Rural Residential in the change I support that change, but I would be grateful if my property(zoned rural2) which is much less in area (4.8 Ha) could also have its zoning change to Rural residential	I have previously used the property for runoff stock grazing when we owned farm land in Marlborough, and then at Thorpe So now I regard the land as uneconomic ,and I would be most grateful if consideration could be made for this change Lot 2 DP7880BLKV11WAIMEA SD -WiTH INT IN EASEMENT DP 18136	Rezone request for 220 champion rd

Ray Hellyer

Submitter 87

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS87.1	Proposed Plan Change No. 81	Oppose	I call for the this Plan Change process to be halted, for it to be left to lie until the option of Tinyhomes is included in the Plan Change.	That as the chance to address the issue of Tinyhomes was in this Plan Change 81 process and the Council has failed.	Update plan change to include tiny homes

Ian and Mary-Jane Reade

Submitter 88

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS88.1	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects	Oppose	Before any great expansion in population of Mapua occurs the roading network including Appleby straight, Whakatu Drive and Bishopdale / Port Nelson road has to be assessed while including all the other growth plans for the region and if needed the road corridors upgraded to safely meet forecast growth expansion.	Each assessment has been done looking at a small localised area. It may be the fragmented way the plan change proposal is put together but I cannot see an analysis or assessment of the roading corridors through Nelson City. The Appleby straight is a high crash rate stretch of road. It has several high crash rates intersections, Landsdowne, Swamp and Rabbit Island roads. There is nothing in the plans around mitigating an at least doubling of traffic on these roads. It is nothing more than reckless if the current plan changes go ahead without a sound plan to address the region's transport issues in place and acted upon before building commences.	I oppose the use of the transport assessment due to its narrow and monocular view of the transport system
OS88.2	2-Out of Scope	Oppose	Provision of boat launching facilities and access to Tasman Bay have to be included in any expansion plans for the region. Existing regional ramps are well over capacity during the summer months. I suggest the possibility of a regional ramp at the end of Bullivant road, Rabbit Island, in conjunction with the Ferry crossing site	With the Mapua boat ramp application being declined there is no inclusion in the Mapua expansion plan for the provision of boat launching capabilities for the region. The existing launch ramp of Grossis point can expect greater than doubling of users in the summer with the increase of Mapua, Brightwater, Wakefield and Richmond areas.	Concerns about provision of boat launching capabilities for the region

Garry Higgins

Submitter 89

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS89.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Oppose	Decline Plan Change 81.	I consider Plan Change 81 would result in the permanent loss of productive Rural 1 horticultural land before a clear and current case has been made that this loss is necessary, justified and in the long-term public interest. I consider the proposal should not proceed unless the need for development outweighs the loss of productive land, risks to regional resilience and emergency access, traffic impacts on Main Road Hope and the availability of alternative sites.	I oppose Plan Change 81 and consider it should not proceed unless Council can demonstrate that the need for development outweighs the loss of productive land, resilience risks, transport effects and available alternatives.

OS89.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Oppose	Retain productive Rural 1 horticultural land and do not convert it to urban development.	I consider the land is a productive food-growing resource that supports local food production, employment, economic activity and regional self-reliance. Once converted to other uses, the productive value of the land may be permanently lost.	I oppose the conversion of productive Rural 1 horticultural land and consider it should be protected from development.
OS89.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Oppose	Give greater consideration to regional resilience and emergency access risks before proceeding with Plan Change 81.	I consider a major fault rupture or disruption to regional transport connections could isolate communities including Nelson, Richmond, Motueka and Golden Bay. Productive food-growing land should be recognised as a strategic resource because access to food and supplies may become more difficult during major disruption events.	I consider Plan Change 81 does not adequately account for emergency resilience and potential future disruption to transport connections.
OS89.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Amend	Reassess the growth assumptions and supporting evidence used for Plan Change 81 before any decision is made.	I consider the proposal relies on growth assumptions that may reflect historical circumstances rather than current conditions. Population growth, employment trends, housing demand, economic conditions, energy costs and wider risks should be reassessed using current information before permanent land-use change is approved.	I consider the growth assumptions supporting Plan Change 81 should be reassessed using current economic, employment, infrastructure and demographic information.
OS89.5	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	Fully assess alternative industrial and commercial land options before approving development of productive horticultural land.	I consider there are alternative sites that may be suitable for industrial or commercial development and that productive horticultural land should only be converted once alternative options have been thoroughly assessed.	I consider alternative industrial and commercial land options should be fully evaluated before productive horticultural land is converted.
OS89.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Amend	Address traffic impacts on Main Road Hope before any decision is made and defer Plan Change 81 if necessary to allow further assessment.	I consider the decision not to proceed with the Hope Bypass increases concerns about traffic effects on Main Road Hope. I also note the petition opposing Plan Change 81 and attendance at a community meeting as evidence of community concern regarding the proposal.	I consider Plan Change 81 may increase traffic congestion on Main Road Hope and note substantial community opposition to the proposal.

Lettie Ormandy Wenn

Submitter 90

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS90.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	That Council does not proceed with further subdivisions or urban development in the Tasman region.	The submitter states that development would change the character of Tasman and Mapua, which people chose for its rural and seaside qualities.	The submitter opposes proposed subdivisions and urban development, stating that residents value the rural and seaside character, open space, peace, and tranquillity of the area.
OS90.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	That Council does not approve new developments where infrastructure capacity is constrained.	The submitter notes Mapua has summer water restrictions and questions how new subdivisions can be serviced using already-limited infrastructure.	The submitter is concerned that existing infrastructure - particularly water supply, power, roading, and amenities - is already at capacity and cannot support additional development.
OS90.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	That Council protects farmland and prevents rural land from being developed for housing. That Council stops approving developments that involve significant land disturbance or increase natural hazard risks.	The submitter believes development contributes to flooding, erosion, and costly repairs after natural disasters. The submitter states farming is essential to New Zealand and that development harms productive land and benefits developers rather than the community.	The submitter is concerned that subdivision and land disturbance increase environmental damage and worsen impacts from extreme weather events. The submitter opposes farmland being converted into subdivisions and wants rural land protected.

Jan Kininmonth

Submitter 91

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS91.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Support	That Council ensures any changes under Plan Change 81 do not result in adverse effects on neighbouring properties, including shading/privacy/noise.	The submitter states that privacy, peace, and access to sunlight are important and should not be compromised.	The submission states support for PC81, but has a few concerns around the building design effects, notably building height, set back and privacy both visual and audio.

Lisa McGregor

Submitter 92

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS92.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Oppose	I don't agree with the papakainga zones. I want the council to stop doing projects of any kind until they get the basics right.	Infrastructure - clean drinking water for a start. the infrastructure is extremely poor in this region. the neglect of our region (waterways) over the years has created problems which we now have to pay extra for. its wrong. You are public servants. please serve us and stop the nonsense projects.	Oppose proposed papakāinga zones

Waimea Inlet Forum Working Group

Submitter 93

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS93.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	That PC81 be amended to require a catchment-scale ecological assessment of cumulative sediment, stormwater, and wastewater effects on the Waimea Inlet, prepared with regard to the Waimea Inlet Management Strategy 2050, before further residential development in the Mapua/Seaton Valley catchment is enabled.	The submitter states that the Inlet is the receiving environment for Mapua/Seaton Valley stormwater and wastewater, and that PC81 does not demonstrate alignment with Council's adopted strategy for the Inlet's health.	The submitter states that Plan Change 81 does not reference or engage with the Waimea Inlet Management Strategy 2050, despite enabling approximately 1,300 dwellings within the Inlet's catchment.
OS93.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	That construction-phase erosion and sediment control requirements be specified for all Mapua and Seaton Valley sites, including construction of the Seaton Valley Detention-Wetland, before any earthworks commence.	The submitter states that earthworks for approximately 1,300 dwellings and the detention-wetland pose a risk of sediment discharge to the Inlet, which PC81 does not address.	The submitter states that PC81 contains no requirement for construction-phase erosion and sediment control for Mapua and Seaton Valley sites, despite significant earthworks draining toward the Waimea Inlet.
OS93.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15	Oppose	That outstanding design matters for the Seaton Valley Detention-Wetland - including salinity impacts on wetland vegetation and the need, timing, and functioning of tide gates - be	The submitter notes unresolved issues including salinity effects and unfunded tide gate protection at Toru Street, and states that PC81 relies on a	The submitter states that stormwater treatment for at least eight PC81 sites relies entirely on the not-yet-built Seaton Valley Detention-Wetland,

	MApua/Ruby Bay > 6.15.3 Policies		resolved, designed, and confirmed funded before further reliance is placed on the wetland as the stormwater safeguard for the Inlet.	stormwater system that is neither built nor fully designed.	which has unresolved design matters affecting the Waimea Inlet.
OS93.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	That a hydraulic model for the Mapua wastewater network be completed, and that trunk wastewater and water supply upgrades - including those crossing the Mapua Channel to Rabbit Island - be brought forward within the current 10-year Long Term Plan before further development reliant on that network proceeds.	The submitter states that without modelling, Council cannot demonstrate confidence in network capacity, and that growth enabled by PC81 may outpace infrastructure intended to protect the Inlet from wastewater failure or overflow.	The submitter states that there is no hydraulic model for the Mapua wastewater network and that required trunk wastewater and water supply upgrades are programmed beyond Year 10 of the Long Term Plan.

Ross Jackett

Submitter 94

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS94.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1 Residential Zone Rules > 17.1.3 Building Construction or Alteration	Oppose	That Council reduces the maximum boundary height in the Richmond MDRZ from 4 metres to 2.5 or 3.0 metres before the recession plane begins.	The submitter states that a 4-metre wall at the boundary would cause significant winter shading, visual dominance, and loss of privacy for neighbouring Richmond properties.	The submitter opposes the Medium Density Residential Zone (MDRZ) building height rule specifically the allowance for a 4-metre vertical height at the boundary in the Richmond residential area.
OS94.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1 Residential Zone Rules > 17.1.3 Building Construction or Alteration	Oppose	That Council reduces the recession plane angle from 60 degrees to 45 degrees, or applies a more restrictive angle on northern and eastern boundaries within the Richmond MDRZ.	The submitter states that the 60-degree angle allows visually dominant multi-storey buildings close to boundaries, affecting sunlight access and residential character.	The submitter opposes the MDRZ Height-in-Relation-to-Boundary rule, specifically the 60-degree recession plane applied in the Richmond residential area.
OS94.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1 Residential Zone Rules > 17.1.3 Building Construction or Alteration	Oppose	That Council requires a minimum side setback of at least 1.5 metres for any residential building exceeding two storeys in the Richmond MDRZ.	The submitter states that increased setbacks would help reduce visual dominance and protect privacy for neighbouring Richmond residential properties.	The submitter seeks changes to MDRZ building setback rule, requesting increased side setbacks for taller buildings in the Richmond residential area.

Feebee Newlands

Submitter 95

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS95.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development > 6.1.3 Policies	Oppose	That Council demonstrates, with clear and independently verified evidence, that Motueka's wastewater network can safely and sustainably support growth enabled under Plan Change 81, including: • current wastewater network capacity;	The submitter states that wastewater infrastructure failures, odour issues, contamination events, and pump station performance raise public health, environmental, and community resilience concerns. Existing residents should not bear additional costs or be disadvantaged by new development. The submitter seeks responsible, evidence-based planning before further growth is enabled.	The submitter is concerned that Motueka's wastewater network, including the Ledger Goodman Pump Station, may not have the capacity or resilience to support the level of growth proposed under Plan Change 81. The submitter seeks assurance that wastewater servicing, public health protection, and infrastructure planning meet the requirements of the Tasman Resource Management Plan.

			• the capacity and role of the Ledger Goodman Pump Station; • required upgrades and their timing; • funding arrangements and developer contributions; • protection of existing residents from increased rates or reduced service levels; • long-term wastewater solutions for Motueka; • assurance that infrastructure planning is integrated with future growth.		

Vanessa and David McGovern

Submitter 96

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS96.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga. Refer to original submission for more information	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga. Support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga.
OS96.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision. we ask the Council to keep Redmill Road as a cul-de-sac, to provide any connectivity to the new development as a walking/cycling path rather than a road, to require a full site-specific assessment of effects before any vehicle connection to Redmill Road could be relied upon, and to support instead a direct Stringer Road–La Mer View connection. Detailed relief is set out in section 8 of the submission. Refer to original Submission for more information	Adverse effects on the existing community and environment - A through-connection would convert Redmill Road from a quiet no-exit road into a through-route – a potential “rat run” for properties on upper Redvale Road and the new development on La Mer View Road for traffic coming and going from the westerly direction. It would introduce adverse traffic, noise and safety effects on approximately 20 existing households for no benefit the network does not already have – a poor and inequitable distribution of effects. - Redmill Road is not formed or designed to carry through-traffic. It has private driveways, and is used informally by residents, children and pets for walking and leisure. Introducing through-traffic creates a real and unnecessary safety risk. - The change would erode the established rural-residential amenity and character of the area – directly relevant under RMA sections 7(c) and 7(f). Inconsistency with the Council’s own consent notice and objectives - The character of the Galeo Estate is not a private preference. It was imposed and registered by the Tasman District Council itself, through Consent Notice 11141705.5 (issued under section 221 of the RMA as a condition of subdivision consent RM 080969). That consent notice requires, among other things: outdoor lighting restricted to hooded or shrouded fittings directing light downwards and mounted no higher than 900 mm – a dark-sky regime (cl f); no fencing on any lot except low post-and-wire or visually-permeable safety fencing (cl g); landscape-integrated buildings in recessive colours (cls b–c); stormwater managed by gravity to natural gullies, with permeable surfaces and reduced runoff (cl k); and no further subdivision of the lots (cl m). - A lit, kerbed, signed vehicular through-road – with headlight sweep at night, traffic signage, and a large sealed surface shedding concentrated stormwater – is fundamentally inconsistent with the dark, open, low-light,	Oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road (site T-226) and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision. Remove indicative road. If connectivity required then a walking and cycling path. Alternatively a connection to Le Mer View. Refer to original Submission for more information

				landscape-led, low-density environment the Council itself required and registered against these titles. The Council cannot coherently require residents to mount lights below 900 mm and forgo fences “to protect amenity”, while routing a lit connector road through the same community. - The Council's own reserve planning treats Redmill Road as a walking environment: the Moutere-Waimea Ward Reserve Management Plan establishes a Redmill Road Walkway Reserve (Map 21). Routing diverted through-traffic onto Redmill Road is fundamentally at odds with the pedestrian and recreational use the Council itself has designated here. - The connection is also inconsistent with Plan Change 81’s own amended objective 11.1.2 (a fully integrated, multi-modal transport system). It serves private vehicles, not active modes, and degrades a currently safe and walkable local road. Section 32 and value for money - A new sealed connector road of this kind – requiring earthworks on steep topography and, in all likelihood, land acquisition – would be significant expenditure for a connection that, as set out above, adds nothing the network does not already have. It is not the most appropriate method to achieve the relevant objectives (RMA section 32). The Council's section 32 alternatives evaluation assessed zoning options only; it did not evaluate alternative road alignments, so the connection has not been tested against the “most appropriate method / reasonably practicable options” standard. - The Council’s own evaluation records that T-226 performs poorly against the wider growth strategy and is supported on cultural grounds. Significant roading investment to integrate this site into the wider network is therefore not strategy-driven, and is poor value for money at a time of acknowledged budget constraint – particularly where existing local infrastructure, including the area's own walking network, is itself under-maintained. - The Infrastructure Report classifies the site as infrastructure-neutral, with developer-led onsite servicing and “no reticulated network delivery dependency”. There is accordingly no servicing need that requires this road. Refer to original Submission for more information	
OS96.3	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.2 Objectives	Support	Support rezoning of T-226 and support aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information	We do not oppose papakāinga development on ancestral land. Refer to original submission for more information	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information

Padwin Holdings Ltd

Submitter 97

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS97.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Delete the rules relating to the Road Traffic Noise Overlay in so far as they relate to others than main roads such as the State Highway and Hope Bypass	Planning update map 80-15 - 'Road Traffic Noise Overlay' Whilst the plan refers to "cross boundary effects from Roads" and required any new building to be "designed, constructed and maintained so that road traffic noise does not exceed 40dBLA eq (24 hr) in any new	Oppose rules relating to the Road Traffic Noise Overlay

				or intended habitable room(s) with a facade within or partly within the area", there is: (i) no scale on update map 80-15 to identify the extent of (depth) the overlay from "the road", where on the relevant road such as a measurement is taken from, nor is it explained as to why exactly the overlay is proposed and why it is necessary. a landowner knows that the road exists, and they probably take their access off it - what is the "problem" which has led to is draconian measure? (ii) all the provision and the relevant rules do is add to the cost and expense of landowners if they want to build/alter their houses - both in terms of costs and consultants (HVAC) costs. Such action on councils part is inflationary in the extreme and irresponsible (iii) the relevant rules and the situations may be appropriate on property adjoining high volume roads such as the Hope Bypass, and the State Highway, but the overlay and Rules should not apply to lesser roads (by way of example) Hill Street, Queen Street, Washbourn Drive, and Wensley Road.	
OS97.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Outside of the CBD area, limit height to 2 story (7 meters). At the very least there should be specific limits on where exactly 11m high buildings may need to be not on a broadside basis throughout the zone. The impact of 11m buildings on and from the elevated part of the zone is likely to be significant.	Whilst I generally support that part of the plan Zone Rule which zones 244 Hill Street medium density residential, I consider that an 11m height allowance outside of the centre of Richmond (the intensive CBD area) is too high. The areas beyond the central Richmond area are long established residential neighbourhoods in which a 11 meter (3 story) building would be a blot, and distract from the amenity of the area.	Requests that height allowance in Hill St area up to 11m be changed
OS97.3	Proposed Plan Change No. 81 > Maps > Area Maps > 15 - Proposed PC81 - Area - Richmond South	Oppose	Delete the Road Traffic Noise Overlay from PC81.	For reasons set out in the annexture hereto. Refer to original submission for more information.	Delete the Road Traffic Noise Overlay from PC81. For reasons set out in the annexture hereto. Refer to original submission for more information.

Denise Yvonne Ritchie

Submitter 98

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS98.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Remove MDRZ zoning from all existing Residential areas outside the Richmond Intensive Development Precinct and revert them to Residential zoning.	The submitter considers MDRZ intensification incompatible with the existing neighbourhood form, visually intrusive due to elevation, and unsafe given current road width, congestion, and visibility constraints.	The submitter opposes the inclusion of Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise, Washbourn Drive, Wensley Road, Waverley Street and Dorset Street in the Richmond Intensive Development Precinct and Medium Density Residential Zone, noting allowing 5-storey (14m) buildings in these locations would create extreme visual dominance, obstruct views and significantly alter the

					character of the area. The streets are narrow, already congested with parked vehicles, and have safety issues due to limited visibility and single-lane movement caused by on-street parking.
OS98.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Reduce maximum building heights under Section 17.1A.3.2 to below the Central Commercial Zone height (10m).	The submitter considers the proposed heights incompatible with surrounding residential areas, out of scale with Richmond's character, and unsupported by evidence in Council's own intensity report.	The submitter opposes the proposed MDRZ building heights of 11m (general MDRZ) and 14m (Richmond Intensive Development Precinct). She states these heights exceed the Central Commercial Zone maximum (10m) and are disproportionate to Richmond's residential character. She cites Appendix 15.2 (Housing Intensity Report), which notes that three storeys generally provide the most appropriate outcome and that four storeys represent a significant step change.
OS98.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Add on-site parking requirements to the Matters of Discretion for all proposals under Section 17.1A.3.2.	The submitter considers that insufficient on-site parking will worsen congestion, reduce road safety, and impede the primary function of public roads.	The submitter is concerned that MDRZ rules do not require on-site parking. She states most households own at least one vehicle, often more, and relying on adjoining streets for parking is inappropriate, especially on narrow streets already congested with parked vehicles. She requests that on-site parking be added to the Matters of Discretion under Section 17.1A.3.2.
OS98.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.1AA: Medium Density Residential Design Matrix	Oppose	Amend Appendix 15.4 to remove incentives for two-storey street-front buildings and ensure developments cannot meet required points while ignoring standards for height, overshadowing, and visual dominance.	The submitter considers the current scoring system capable of enabling developments that significantly reduce sunlight, privacy, outlook, and amenity for neighbouring properties.	The submitter opposes incentives in the Design Matrix that award points for buildings of at least two storeys at the street frontage. She does not consider multi-storey buildings directly adjoining the street to contribute positively to residential streetscape character. She also raises concerns that Section B allows developments to meet required points even if they ignore standards relating to height, overshadowing, and visual dominance.

Peter Robertson Ritchie

Submitter 99

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS99.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Remove MDRZ zoning from all existing Residential areas outside the Richmond Intensive Development Precinct and revert them to Residential zoning.	The submitter considers MDRZ intensification incompatible with the existing neighbourhood form, visually intrusive due to elevation, and unsafe given current road width, congestion, and visibility constraints.	The submitter opposes the inclusion of Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise, Washbourn Drive, Wensley Road, Waverley Street and Dorset Street in the Richmond Intensive Development Precinct and Medium Density Residential Zone, noting allowing 5-storey (14m) buildings in these locations would create extreme visual dominance, obstruct views and significantly alter the character of the area. The streets are narrow, already congested with parked vehicles, and have safety issues due to limited visibility and single-lane movement caused by on-street parking.
OS99.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose			The submitter opposes the proposed MDRZ building heights of 11m (general MDRZ) and 14m (Richmond Intensive Development Precinct). He states these heights exceed the Central Commercial Zone maximum (10m) and are disproportionate to Richmond's residential character. He cites Appendix 15.2 (Housing Intensity Report), which notes that three storeys generally provide the most

					appropriate outcome and that four storeys represent a significant step change.
OS99.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Add on-site parking requirements to the Matters of Discretion for all proposals under Section 17.1A.3.2.	The submitter considers that insufficient on-site parking will worsen congestion, reduce road safety, and impede the primary function of public roads.	The submitter is concerned that MDRZ rules do not require on-site parking. She states most households own at least one vehicle, often more, and relying on adjoining streets for parking is inappropriate, especially on narrow streets already congested with parked vehicles. She requests that on-site parking be added to the Matters of Discretion under Section 17.1A.3.2.
OS99.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.1AA: Medium Density Residential Design Matrix	Oppose	Amend Appendix 15.4 to remove incentives for two-storey street-front buildings and ensure developments cannot meet required points while ignoring standards for height, overshadowing, and visual dominance.	The submitter considers the current scoring system capable of enabling developments that significantly reduce sunlight, privacy, outlook, and amenity for neighbouring properties.	The submitter opposes incentives in the Design Matrix that award points for buildings of at least two storeys at the street frontage. He does not consider multi-storey buildings directly adjoining the street to contribute positively to residential streetscape character. He also raises concerns that Section B allows developments to meet required points even if they ignore standards relating to height, overshadowing, and visual dominance.

Evan Walker

Submitter 100

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS100.1	Proposed Plan Change No. 81 > Maps > Area Maps	Oppose	Correct the maps so they give a coherent picture of the long term planning for this section of Mapua. See original submission for further details.	The map is contradictory in that both 'deleted indicative roads' : and 'indicative roads' are shown on top of each other. At the drop in at Mapua which we could not attend a neighbour was told that these roads should not have been shown at all. Also there is no indicative walkway shown, as per the Mapua masterplan map (attached). We have been given a different plan again, obtained from TDC recently by another neighbour. We do not know the provenance of this plan, but it shows yet another road layout.	Opposes the layout of roads shown on area maps 80-3, conflict with Mapua Masterplan map (Higgs Road), and map supplied by neighbour.

Vita Otrubova

Submitter 101

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS101.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	That Council reconsider the scale and timing of Urban Growth – Plan Change 81 and complete a comprehensive assessment of infrastructure capacity and funding before approving any significant increase in housing. The submitter seeks assurance that future development will	The submitter considers that the proposed level of growth is unsustainable without confirmed infrastructure upgrades. She believes that inadequate infrastructure planning will lead to traffic congestion, pressure on essential services, environmental impacts,	The submitter opposes Urban Growth – Plan Change 81 on the basis that the proposed scale of development will permanently alter the character of Māpua and place unacceptable pressure on infrastructure and public services. The submitter is concerned that the plan prioritises housing numbers without demonstrating that

			protect Māpua's character and ensure infrastructure is in place before growth occurs.	and loss of Māpua's village identity. She states that once Māpua's character is lost, it cannot be recreated.	essential infrastructure - roads, intersections, water supply, wastewater, stormwater, electricity, healthcare, schools, and public transport - can support the proposed population increase. Without a comprehensive assessment of infrastructure capacity and funding, Māpua risks losing the qualities that make it a valued community.

Richmond Baptist Church

Submitter 102

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS102.1	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.2: Outline Spatial Plan - 123 Salisbury Road	Amend	References to "Mixed Density Housing" on the Outline Spatial Plan shall be changed to "Medium Density Housing".	Mixed Density Housing Area? This appears to be a typo on the Outline Plan. I presume it should read "Medium Density Housing Area". It does appear on all the Outline Plans in the PC 81. I cannot find any other reference to a "mixed density" housing in the rest of Plan Change 81. It is always referred to" Medium density" in the Plan Change documents so I assume it is a typo and should be "medium density housing" on the Outline Spatial Plan.	Oppose in part. Amend, fix typo. Mixed Density Housing Area? This appears to be a typo on the Outline Plan. I presume it should read "Medium Density Housing Area". Refer to original submission for more information.
OS102.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.2: Outline Spatial Plan - 123 Salisbury Road	Amend	Bullet point two (Access and Transport) shall be deleted: ~~*Prior to development, a new road link shall be constructed between Arbor-Lea Avenue and Champion Road. The landowners will be responsible for their respective properties.*~~ And instead replaced with the following wording: Prior to development of more than six dwellings on the 123 Salisbury Road site and/or any subdivision creating residential allotments, a new road link shall be constructed between Arbor -Lea Avenue and the boundary with 141 Salisbury Road. Within two years of the completion and vesting of the Connecting Road through the 123 Salisbury Road site, the Tasman District Council shall complete the remainder of the connecting road through to Champion Road.	2) We are opposed to the wording of the second bullet point under Access and Transport, which currently states: *Prior to development, a new road link shall be constructed between Arbor-Lea Avenue and Champion Road. The landowners will be responsible for their respective properties.* The current wording effectively requires the developer of the 123 Salisbury Road site to construct the entire connecting road between Arbor-Lea Avenue and Champion Road before any development can proceed. This places the cost of delivering infrastructure that benefits the wider area on a single landowner. The cost of constructing the entire road connection before any development can occur is likely to make development of the site economically unviable. In effect, the provision could effectively prevent or significantly delaying the delivery of the medium-density housing that Plan Change 81 is intended to enable. Rather than facilitating housing supply, the provision risks frustrating the Council's objective of increasing residential capacity in Richmond. We consider that the requirement should be proportionate to the scale of development and should not require one landowner to bear the cost of infrastructure that provides a wider public benefit and will ultimately serve multiple properties and future developments.	Oppose in part. The current wording effectively requires the developer of the 123 Salisbury Road site to construct the entire connecting road between Arbor-Lea Avenue and Champion Road before any development can proceed. This places the cost of delivering infrastructure that benefits the wider area on a single landowner. Bullet point two (Access and Transport) shall be deleted: ~~*Prior to development, a new road link shall be constructed between Arbor-Lea Avenue and Champion Road. The landowners will be responsible for their respective properties.*~~ And instead replaced with the following wording: Prior to development of more than six dwellings on the 123 Salisbury Road site and/or any subdivision creating residential allotments, a new road link shall be constructed between Arbor -Lea Avenue and the boundary with 141 Salisbury Road. Within two years of the completion and vesting of the Connecting Road through the 123 Salisbury Road site, the Tasman District Council shall complete the remainder of the connecting road through to Champion Road.

				It is vital that the Bullet Point 2 (Access and Transport) makes it clear that owner of 123 Salisbury Road, or whoever is developing the property is responsible for constructing the road within the 123 Salisbury Road and That Council is responsible for constructing the road from the boundary with 123 Salisbury Road to Champion Road shall be constructed by Council, but any delay in Council completing the road connection should not hold up development of the 123 Salisbury site. Also we may want to sell the block of undeveloped land (of part of it)as a "development block" to a third party, purely for change on ownership, with no new residential lots being created, and we need to be able to do this without having to form the road.	- Refer to original submission for more information.
OS102.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.2: Outline Spatial Plan - 123 Salisbury Road	Amend	Relief Sought (Open Space, Recreation and Community Facilities. Deletion of Bullet point one, ~~An area of Open space must be vested as an expansion of the open space surrounding the Richmond Aquatic Centre, unless Council declines to receive it.~~ And replaced with the following: An area of open space of no more than 2000m2 must be vested in Council adjoining the eastern side of the connecting road, as an expansion of the open space surrounding the Richmond Aquatic Centre. unless Council declines to receive it.	3) An area of Open Space. The first bullet point mentions that "an area of Open space must be vested as an expansion of the open space surrounding the Richmond Aquatic Centre, unless Council declines to receive it." We don't have a problem with an open space reserve, but we do have a problem with the location of it as shown on the Outline Spatial Plan, which is right in the prime medium density residential area. We believe the provision of open space is better served by moving the new open space expansion park down to fronting the access road as shown on the attached outline spatial plan. The advantages of this are: . The open space expansion would have good road frontage, which allows family use and provides good passive security plus good connection to local cycleways. We believe it is Council policy for new parks to have good road frontage, which this site would have. . This section of park can easily be connected by walkway to rest of the aquatic centre area. . The park can take advantage of the existing nearby native tree planting to be enhanced by the new park plantings. . Drainage works as part of the subdivision and connecting road development will ensure the park is well drained and extending the bund along the deviation will significantly reduce road noise. . The park area would be in area where houses cannot be built, meaning it would be good use of the land.	Oppose in part. Amend location and wording relating to the Open space area. The first bullet point mentions that "an area of Open space must be vested as an expansion of the open space surrounding the Richmond Aquatic Centre, unless Council declines to receive it." We don't have a problem with an open space reserve, but we do have a problem with the location of it as shown on the Outline Spatial Plan, which is right in the prime medium density residential area. Replaced with the following: An area of open space of no more than 2000m2 must be vested in Council adjoining the eastern side of the connecting road, as an expansion of the open space surrounding the Richmond Aquatic Centre. unless Council declines to receive it. Refer to original submission for more information.
OS102.4	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.2: Outline Spatial Plan - 123 Salisbury Road	Amend	The following change to Land Use: *A Residential Restriction Area applies to the Richmond Deviation, Permanent Residential Buildings are prohibited within this area due to flooding hazard, future sea inundation, and over head powerlines,*	While we can understand that residential buildings needs to be restricted in this area because of the lowing lying nature and proximity to the deviation, it should not stop all buildings. This restriction effectively makes this area unusable. If the hazard risk can be mitigated (including proximity to power lines) then non-residential buildings should be allowed. Refer to original submission for more information.	Oppose in part. Building restriction area - Land Use The following change to Land Use: *A Residential Restriction Area applies to the Richmond Deviation, Permanent Residential Buildings are prohibited within this area due to flooding hazard, future sea inundation, and over head powerlines,* If the hazard risk can be mitigated (including proximity to power lines) then non-residential buildings should be allowed.

Denis and Valerie Reeve

Submitter 103

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS103.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Reserve medium density development for where it's better suited - established urban centres with the commercial services, transport networks, and infrastructure needed to support increased population density	Māpua is a coastal village rather than an urban centre. In our view, its existing housing density is sufficient to meet local needs while preserving the character and identity of the community.	Opposes medium density zoning in Māpua
OS103.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Change to meet the practical needs of older residents such that two-storey homes may not be suitable or accessible for many elderly people.	High-density, multi-storey housing may provide efficient use of land, but it does not necessarily meet the practical needs of older residents. There seems to be no emphasis on accessibility, mobility, and the day-to-day realities of ageing.	The planners have presented the idea that we will have a walkable community with medium-density housing intended, in part, for local retirees wishin to downsize.
OS103.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	We question whether the resulting townhouses would be genuinely affordable for this group. Given Māpua's desirability as a destination, we are also concerned that Medium Density housing may attract outside investors seeking holiday homes or weekend retreats. Some of these properties could remain vacant for significant periods of the year, a security issue and doing little to address the region's housing needs	There is a townhouse at 3/2 Elizabeth Street in Richmond is currently on sale with Summit Real Estate at offers over $709,000. This is unlikely to be affordable for many first home buyers.	The submitter considers that medium density housing option will not necessarily improve options for first home buyers
OS103.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	provision for more traffic and parking availability that comes with a denser population	The planners describe their visualisation as creating a "walkable/cycleable environment", Māpua is already just that. Residents must still travel outside the village for employment, medical appointments, airport access, and other essential services. For most households here owning and using a car remains a necessity. Also, Māpua's local streets have limited capacity, particularly during the holidays. Additional housing density could worsen congestion, increase parking pressure, and create further safety risks for pedestrians and cyclists.	Medium-density zoning is likely to increase traffic volumes and demand for on-street parking.
OS103.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	consider impact of increased development density on existing infrastructure	increased development may also place additional pressure on storm water systems and increase existing flood risks. these matters require careful consideration before any further intensification is enabled more broadly, the proposed rezoning risks changing the character and ambience that distinguish Māpua as a coastal village. Once that character is lost, it cannot easily be restored	Concerned about ability of existing 3 waters systems to supply a growing population

Amy Crerar

Submitter 104

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS104.1	Proposed Plan Change No. 81 > Maps > Zone	Oppose	That Council does not rezone 30 Rototai Road until independent assessments of flooding, stormwater,	The submitter considers the rezoning premature and potentially harmful to	The submitter opposes rezoning 30 Rototai Road from Rural to Residential. She is concerned about existing flooding in the area,

	Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd		groundwater, bore water impacts, and agricultural land value are completed, and alternative locations for higher-density housing are fully evaluated.	environmental conditions, rural land productivity, neighbouring amenity, and community wellbeing.	potential stormwater redirection, and effects on neighbouring properties if new dwellings are elevated. She also raises concerns about groundwater impacts, noting that many nearby properties rely on private bores. The submitter states the land is productive and arable, and believes strong justification is needed before converting high-value rural land to residential use. She is also concerned about loss of rural character, increased noise, traffic, light pollution, privacy impacts, and effects on residents' wellbeing.

Lesley A.S McIntyre

Submitter 105

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS105.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Amend PC81 to require that all major infrastructure upgrades in Mapua are fully funded by developers, with no cost burden on existing ratepayers, and that infrastructure must be completed before development is approved.	The submitter considers that Mapua's infrastructure cannot safely support MDRZ intensification and that ratepayers should not bear the cost of upgrades required for new development.	The submitter opposes the MDRZ proposed for Mapua. They state that Council has not provided evidence that major infrastructure upgrades - particularly water supply, wastewater, stormwater, and transport - will be fully funded by new development rather than existing ratepayers. They note that PC81 refers to "credible pathways" for infrastructure delivery but does not guarantee timely upgrades. They believe MDRZ development numbers are too high for Mapua's current infrastructure and would create significant cumulative effects.
OS105.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	Reduce MDRZ development numbers in Mapua and amend PC81 to ensure traffic impacts are fully assessed and mitigated before any MDRZ development is approved.	The submitter considers that Mapua's road network cannot safely accommodate the traffic generated by MDRZ development and that the village would suffer severe congestion.	The submitter opposes MDRZ zoning across large areas of Mapua, stating that the proposed density would more than double the village's population without providing new roads or transport corridors. They are concerned that MDRZ development between Higgs Road and Mapua Drive would create gridlock, with large numbers of vehicles expected to exit via Jessie Street. They state that Mapua is currently a village and that the proposed urban growth would overwhelm its transport network and character.
OS105.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Amend Section 17.1A.3.2 to require guaranteed off-street parking for all MDRZ dwellings.	The submitter considers that without off-street parking, Mapua will experience severe congestion, unsafe streets, and loss of village character.	The submitter opposes the lack of guaranteed off-street parking in MDRZ. They state that while minimum parking requirements have been removed, there is no maximum, meaning large numbers of vehicles may be unplanned for. They believe off-street parking must be guaranteed for all new dwellings to avoid gridlock and protect the function of public roads.
OS105.4	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Amend PC81 to reduce MDRZ zoning in Mapua and consider controls on dwellings used for short-term accommodation.	The submitter considers that MDRZ will not address long-term housing needs and may increase short-term rentals, reducing housing availability for residents.	The submitter states that PC81 assumes community support for cumulative growth across Mapua, which they do not believe is accurate based on their attendance at Mapua Masterplan meetings. They also note that the rise of Airbnb contributes to the shortage of long-term rentals and question whether Mapua needs more short-term holiday accommodation. They believe MDRZ will worsen housing availability and undermine community cohesion.

Jane and Andrew Brown

Submitter 106

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS106.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Amend	confirm zoning but extend zoned area	As shown in Figure A below, this area would provide an effective buffer to Mapua Drive. The land is low-lying and cold and contains ageing gum and wattle trees that present a safety risk and should be removed.	T-239 Commercial Zoning — Support, provided the zoning is extended to the parcel boundary of 120 Higgs Road.
OS106.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Oppose	Amend the rezoning extent consistent with the layout shown in Figure A and consider a deferred zoning approach where servicing capacity is uncertain.	The site contours, earthworks requirements, batters, roading and reserve requirements reduce the practical developable area. The proposed zoning does not adequately reflect these constraints or current servicing limitations.	Oppose the extent of MDRZ proposed for T-237a and seek a revised zoning pattern that better reflects site contours, development constraints and servicing availability.
OS106.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.9: Outline Spatial Plan - Mapua Higgs Road	Oppose	Reduce the density requirement from 18 dwellings per hectare to 15 dwellings per hectare, or provide lower-density residential zoning in areas where MDRZ is less suitable.	The site topography, earthworks requirements, batters, roading and reserve land requirements make the proposed density difficult to achieve across the whole site.	Oppose the requirement to achieve an average density of 18 dwellings per hectare across the MDRZ area and seek a lower density requirement or a mixed zoning approach.
OS106.4	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.9: Outline Spatial Plan - Mapua Higgs Road	Amend	Provide larger lots and greater open space on upper contours and ridgeline areas, with higher density development focused in more suitable locations.	The upper parts of the site have important landscape values and contribute to the coastal setting of Māpua.	Seek amendments to the proposed housing mix and development pattern to better protect landscape values and visual amenity on the upper parts of the site.
OS106.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Support	Retain or introduce provisions enabling two dwellings as a permitted activity.	Two dwellings should be enabled regardless of whether the site is zoned residential or MDRZ.	Support enabling two dwellings as a permitted activity across the site.
OS106.6	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Support	Retain no land use consent requirement for greenfield MDRZ developments.		Support the removal of land use consent requirements at subdivision stage for greenfield development within the MDRZ.
OS106.7	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Remove or reduce land use consent requirements for brownfield subdivisions.	The requirement would create significant upfront development costs before titles are issued and may affect project funding and growth.	Oppose requiring land use consent at the subdivision stage for brownfield development.
OS106.8	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Provide a mixed zoning outcome that gives greater weight to landscape values, visual amenity and transitional development at the coastal edge.	The site forms part of the coastal backdrop to Māpua and Ruby Bay and may become increasingly visually prominent over time.	Oppose extensive MDRZ coverage across prominent hillside land and seek a more balanced zoning pattern that better recognises landscape values and the coastal setting.
OS106.9	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.9: Outline Spatial Plan - Mapua Higgs Road	Oppose	Remove or amend the building restriction and planting requirements.	The site is already separated from the road by setbacks and level differences. The restriction is considered an inefficient use of residential land and provides limited mitigation benefit.	Oppose the proposed 5-metre building restriction area and associated native planting requirements along Higgs Road.
OS106.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules	Amend	Amend road and transport connection requirements to provide greater flexibility in	Transport connections should not be the only priority when determining development outcomes.	Oppose provisions that focus primarily on predetermined transport link alignments and

	> Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.9: Outline Spatial Plan - Mapua Higgs Road		responding to site topography and achieving residential development outcomes.		seek greater flexibility to respond to site constraints.
OS106.11	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.9: Outline Spatial Plan - Mapua Higgs Road	Oppose	Allow direct lot access to Higgs Road where frontage upgrade costs are imposed on developers, or remove the upgrade requirements.	Developers should not be required to fund frontage improvements if they are unable to obtain direct access to the road.	Oppose restricted access requirements and frontage upgrade obligations where direct lot access to Higgs Road is not available.
OS106.12	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.9: Outline Spatial Plan - Mapua Higgs Road	Oppose	Review the number, location and need for neighbourhood parks.	The basis for requiring two parks is unclear and existing nearby open space should be considered.	Oppose the requirement for two neighbourhood parks without further justification.
OS106.13	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	Apply deferred zoning where servicing capacity is uncertain and prepare a clear infrastructure servicing plan identifying upgrades, timing and funding.	The first-in, first-served approach does not provide certainty that infrastructure will be available when required and may create development constraints, uncertainty and unexpected upgrade costs.	Oppose reliance on a first-in, first-served servicing allocation model and seek a deferred zoning approach where infrastructure capacity is uncertain.
OS106.14	Proposed Plan Change No. 81 > Maps > Area Maps > 06 - Proposed PC81 - Area - Mapua, Mapua Dr - Higgs Rd	Amend	Replace the blanket noise mitigation requirement with a consent notice approach for lots within 60 metres of the centreline of Māpua Drive.	The current provisions may impose unnecessary compliance costs and constrain the residential development outcomes anticipated by PC81 while acknowledging that future owners should be made aware of potential traffic noise effects.	Oppose the blanket traffic noise requirements applying to residential development and seek a more discretionary approach.

Victor and Rahel Sharrock

Submitter 107

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS107.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Clarification that rezoning the reserve land between the properties will not affect their use of the property. If rezoned, they seek that: keep access to our garage and property have adequate screening between our property and any developed land a traffic management plan to be put in place for Hunter Avenue to ensure safe and slow traffic flow	They have concern over: loss of access to our property the change of the amenity of land adjoining us visual impact of adjoining dwellings on other property traffic safety concerns	Submitter is concerned that rezoning the area will change their property access among other things

Glenys and Noel Forbes

Submitter 108

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS108.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Maintain Māpua as a 'destination' for holiday makers due to its quaint and laid back nature	If you go ahead with all this extra housing this atmosphere will be lost	Concerned of impact extra housing will have on Māpua
OS108.2	2-Out of Scope	Oppose		People bought here for the rural atmosphere	Concerned that plan change will affect house prices
OS108.3	2-Out of Scope	Amend	reconsider more housing	cheaper housing will bring more people; there is virtually no crime here	Seeks reconsideration for more housing to provide affordable options and attract residents, citing low local crime rates.
OS108.4	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects	Oppose		In summer our roads and infrastructure struggle to cope. our school is full. the school won't cope with extra numbers. the roads won't cope. there is not enough parking spaces now.	Concerned about impact of denser housing on existing infrastructure
OS108.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Would prefer no 2 storey homes	Who wants stairs??!!	Opposes 2 storey homes
OS108.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	reconsider raised houses in populated areas	These sections (in the map) are raised. 1.5 metres from boundary would be horrendous. No privacy at all for existing homes. These homes were purchased because of the paddocks giving a country feeling.	Privacy concerns from raised houses

Alan Steffert and Julie Nielsen

Submitter 109

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS109.1	Proposed Plan Change No. 81 > Maps	Amend	**Specific changes to PC81 Appendix 1, Schedule 16.3D.9 requested:** ADD green space with a cycle/walk path along the boundary of 91 Aranui that borders areas T-237a and T-237-b into T-237g.	The submitters state that the planned open space and cycle/walk path shown on Map 80-32 disappears along their boundary where a road is indicated. They seek a continuous open space and path connection from Aranui Road through to T-237g to provide continuity and support movement by foot and bicycle between zones	The submitters request the map 80-32 be edited to show a continuous open area with bike/cycle lanes that extends from Aranui Rd into area T-237 g.
OS109.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 34 - Proposed PC81 - Zone - Mapua, Higgs Rd	Oppose	REJECT the PC81 proposed zoning changes for Higgs Rd (T-237a, b, and g) and RETURN to the zoning assigned to them by the Mapua Master plan.	The submitters state that the proposed zoning differs from the zoning in the recently adopted Mapua Master Plan. They consider the existing Mapua Master Plan zoning adequate, state that the changes are not necessary to achieve NPS-UD requirements, raise concerns about the scale of development proposed, note infrastructure, flooding and sea level rise constraints, refer to uncertainty regarding local public open space, and express concern about the scope, timing, and opportunities for public input in the PC81 process.	The submitters oppose the proposed rezoning of T-237a and T-237b and seek retention of the zoning provided in the Mapua Master Plan.

Graeme Galey

Submitter 110

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS110.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Reduce building heights and revise daylight angle rules to prevent excessive overshadowing. Limit multi-storey development to sites with southern road frontage or new residential areas. Improve clarity of PC81 maps and explanatory material.	The submitter considers the proposed rules will cause significant loss of sunlight, privacy, and amenity for existing residents, and that the complexity of PC81 materials limits public understanding.	The submitter opposes the height and daylight angle rules in PC81. They state that allowing 4.5 m buildings only 1.5 m from the southern boundary, combined with a 60-degree daylight angle, will remove winter sunlight from many existing single-storey homes - especially those with southern road frontage. They are also concerned that 14 m multi-storey buildings could surround existing homes, causing severe shading and summer overheating. They believe multi-storey development should only occur on sites with southern road frontage or on new residential land. They also note that demand for apartments appears uncertain and that PC81 maps and videos are difficult for residents to understand.

Tony Mcleod

Submitter 111

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS111.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Require all new builds in Tasman to have porous driveways and parking areas.	The submitter states that porous surfaces would reduce demand for concrete, reduce rainwater runoff into stormwater drains, and be cheaper than concrete.	The submitter seeks a requirement for all new builds in Tasman to have porous driveways and parking areas.
OS111.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Require all new builds in Tasman to have north-facing roofs with solar panels.	The submitter states that this would reduce demand for non-green electricity production, reduce electricity costs over time, and assist New Zealand to meet carbon reduction goals.	The submitter seeks a requirement for all new builds in Tasman to have north-facing roofs with solar panels.
OS111.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Amend	Use the former Carter Holt site near Brightwater for housing expansion.	The submitter states that the site could accommodate housing without reducing productive land, already has infrastructure including roading, reticulated water and power, contains extensive concrete areas that could support commercial or light industrial activities, is close to Richmond, and should not be left unused.	The submitter suggests the former Carter Holt site near Brightwater be used for housing expansion rather than productive land.

Alexander Everitt

Submitter 112

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS112.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	Supports proposed rezoning of T-226 to enable papakāinga housing	We believe it is important that whānau have the opportunity to live on their ancestral land and nothing in this submission should be interpreted as opposition to that objective	Supports papakāinga development
OS112.2	Proposed Plan Change No. 81 > Maps	Oppose	Ensure development occurs in a way that does not unnecessarily compromise an existing community when practical alternatives are available. We do not believe converting Redmill Road into a through-road is the appropriate solution. We support the alternative suggested by neighbouring submitters: retaining Redmill Road as a cul-de-sac ensure PC81 does not presume or rely upon a future vehicle connection between Stringer Road and Redmill Road Support active transport links between the developments instead of a vehicle connection providing walking and cycling connectivity between Redmill Road and the papakāinga development investigating a direct Stringer Road-La Mer View Road connection if additional vehicle connectivity is required require any future proposal for a vehicle connection to undergo a full assessment of traffic, safety, amenity and environmental effects	This approach achieved transport objectives while preserving the safety, character and amenity of Redmill Road for both existing and future residents	Oppose through road connecting Stringer Road with Redmill Road

Ruth and Bruno Zahner

Submitter 113

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS113.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Scale back the projected urban growth areas and reduce the amount of development enabled in Māpua.	The submitters note that the TRPS modelling predicts a minimum requirement of 404 dwellings between 2035 and 2054, while Plan Change 81 would allow up to 1,262 dwellings. They consider this level of growth is unjustified and would irrevocably change the character of Māpua.	Oppose the scale of residential growth proposed for Māpua and consider the number of dwellings enabled by Plan Change 81 significantly exceeds the level of growth anticipated for the settlement.
OS113.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Reduce the scale of development proposed for Māpua and give greater weight to the existing character of the village.	The submitters consider Māpua is a small coastal village rather than a true urban environment and that extensive urban development would undermine its unique character, amenity values and community-focused identity.	Oppose urban growth at a scale that would fundamentally alter the existing village character, amenity values and community identity of Māpua.
OS113.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Reconsider or reduce the scale of development proposed for Māpua.	The submitters consider the increased housing enabled by Plan Change 81 would result in substantial traffic growth, including	Oppose the scale of development proposed due to the associated increase in traffic volumes and transport effects.

				significant increases in traffic volumes on Māpua Drive, creating adverse environmental effects.	

Takaka Aero Heights Ltd

Submitter 114

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS114.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 58 - Proposed PC81 - Zone - Takaka, Puramahoi	Amend	Rezone 262 Tākaka-Collingwood Highway (Lot 2 DP 537101) from Rural 2 Zone to Rural Residential Zone. Amend the planning maps and all associated provisions, schedules and mapping layers as necessary to give effect to the rezoning. Make any consequential amendments required to support the efficient development of the site for Rural Residential purposes and grant any further, alternative or consequential relief necessary to give effect to the intent of the submission.	The submitter considers the site is suitable for Rural Residential development because it adjoins existing Rural Residential development, is opposite land proposed for Rural Residential rezoning through PC81, is located near proposed Light Industrial land and the Tākaka Aerodrome, and forms part of a logical and coherent extension of the Rural Residential environment. The submitter considers the site is no longer situated within a predominantly productive rural landscape and would provide a logical transition between rural, residential, industrial and airport-related activities. The submitter notes that PC81 already includes rezoning sites not specifically identified through the Future Development Strategy and considers the site should similarly be assessed on its planning merits. The submitter considers the site aligns with the broader strategic growth direction for the Tākaka Aerodrome area identified through the Future Development Strategy, is located close to Tākaka township, has access to the state highway network, is separated from highly productive land resources, and is within an area identified as suitable for future growth. The submitter also considers the site represents a logical gap-filling opportunity that would consolidate development already enabled or proposed through PC81 rather than creating a new or isolated growth area. The submitter considers the site is not materially constrained by natural hazards such as flooding or coastal inundation, does not meet the definition of Highly Productive Land under the National Policy Statement for Highly Productive Land, and can be serviced through on-site wastewater treatment,	Seek rezoning of 262 Tākaka-Collingwood Highway (Lot 2 DP 537101), comprising approximately 39.3 hectares, from Rural 2 Zone to Rural Residential Zone. The submitter considers the site forms a logical extension of existing and proposed Rural Residential development near Tākaka Aerodrome and should be included within PC81 to provide additional housing capacity and housing choice in Golden Bay. The submitter considers the site is well located in relation to Tākaka township, adjoins existing Rural Residential development, is opposite land proposed for Rural Residential rezoning through PC81, is near proposed Light Industrial land, and sits within an area already experiencing land use change and development pressure. The submitter considers retaining Rural 2 zoning would create an inefficient and fragmented planning outcome by leaving a large area of land surrounded by existing and proposed development opportunities while limiting its contribution to future growth.

				rainwater supply and appropriate access arrangements. The submitter considers servicing demands would be similar to nearby Rural Residential areas already proposed through PC81. The submitter considers the rezoning is consistent with the National Policy Statement on Urban Development because it would provide additional development capacity and housing choice in a well-located and feasible location. The submitter notes that PC81 is forecast to leave a housing shortfall and considers the site can contribute to future housing supply in Golden Bay while maintaining the low-density character anticipated within the Rural Residential Zone. The submitter considers the rezoning would create a more efficient and integrated pattern of development, utilise land that is not Highly Productive Land, avoid pressure for development on more constrained land elsewhere around Tākaka, and support the sustainable management and efficient use of natural and physical resources.	

Wendy Trevett

Submitter 115

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS115.1	Proposed Plan Change No. 81 > Maps > Area Maps > 07 - Proposed PC81 - Area - Mapua, Seaton Valley Rd	Support	Council to retain map	this would provide better access and visibility onto Pomona Road. Also terrain is more suitable for pedestrians and cyclists being not too steep a gradient. this would be a safer option from Pomona Road to Seaton Valley Road due to the narrow and winding conditions of Pomona Road	Supports deleting indicative walkway between 67 and 69 Pomona Road and supports the indicative walkway showing on the map further up Pomona Road coming down to the flat area of seniors development

Scott Nicol

Submitter 116

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS116.1	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values	Amend	Amend amenity policies so that lighting impacts on neighbours are considered.	The submitter wishes lighting impacts on neighbours to be considered as part of amenity provisions.	The submitter seeks amendment of amenity policies so that lighting impacts on neighbouring properties are considered.

OS116.2	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values	Amend	Amend amenity policies so that lighting impacts on the night sky are considered to maintain dark skies.	The submitter wishes lighting impacts on the night sky to be considered in order to maintain dark skies.	The submitter seeks amendment of amenity policies so that lighting impacts on the night sky are considered to maintain dark skies.
OS116.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Amend	Require assessment of trees that are not chosen as protected trees before development.	The submitter considers that assessment should occur before development even where trees have not been selected for formal protection.	The submitter seeks assessment of trees that are not selected as protected trees before development occurs.
OS116.4	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Amend	Increase land allocated to developments to provide more area per bedroom, or otherwise provide opportunities to support food resilience.	The submitter considers the land area accompanying developments is too small to allow community resilience through growing food.	The submitter considers the land area allocated to residential development is too small to support household food production and community resilience.

Helen Bro

Submitter 117

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS117.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Has noted that dwellings are already required to build more than 1m above the current level of the land, due to climate change and wants to know if the new subdivisions will also be required to raise the foundations to that height. Concerned that these height requirements could end up with dwellings that are 12+ metres high. Concerned about new buildings being protected from flood events and how height requirements will affect existing dwellings and sunlight access	See original submission for details	Has concerns about building heights in the MDRZ
OS117.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.9 Motueka	Oppose	Consider - where will these new homes source fresh water? where will their wastewater go? certainly not to Ledger Goodman Pumping Station, which is already known to be able to being overwhelmed at times	Refer to original submission for details.	Concerns about three waters access in Motueka
OS117.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.9 Motueka	Oppose	Concerns - Does Motueka have the ability to absorb a sudden increase in population? For instance, medical care? Has that been assessed?		Concerned about Motueka's ability to hold a growing population
OS117.4	2-Out of Scope	Oppose	Currently, some homeowners have difficulty obtaining house insurance, due to listed hazards. is there any kind of assurance that at the end of the day these dwellings will be able to indeed be able to insurance for their homes	Refer to original submission for details	Concerned about future residents being able to obtain home insurance

Frank A McKay

Submitter 119

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS119.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 48 - Proposed PC81 - Zone - Richmond, Champion Rd	Oppose	Retain the Champion Road sites at 40–50 and 66/74 as Residential Zone and do not apply MDRZ.	The submitter considers MDRZ inappropriate for this location due to distance from town centres, adverse effects on neighbourhood character, and significant parking and access issues that would compromise road safety and service vehicle access.	The submitter opposes rezoning the Champion Road sites to MDRZ, noting they are not close to town centres and that MDRZ development would adversely affect the existing residential environment. They are concerned that duplexes or townhouses would create parking problems, as residents would still own vehicles and Champion Road has parking restrictions. Overflow parking would likely occur on Forget Me Not Lane, which already experiences congestion from school parking and would block rubbish trucks and larger vehicles. They consider the area to be modern residential housing that should not be surrounded by MDRZ development.

Terry and Giovana Milton

Submitter 120

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS120.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga. Refer to original submission for more information	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga. Support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information	Support the rezoning of T-226 (Stringer Road, Redwood Valley) to Papakainga.
OS120.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	7.1 A direct Stringer Road–La Mer View connection. 7.2 A walking and cycling path, not a road, to Redmill Road. 7.3 Redmill Road remains a cul-de-sac. Alternative relief (only if any vehicle connection to Redmill Road is retained or provided for) That any such connection be subject to provisions requiring that it: - (d) be designed, funded and constructed by the developer, and completed before any additional dwellings relying on it are occupied; - (e) demonstrate safe access to Redmill Road (sight distances, road width, driveway effects and speed management); - (f) result in no more than minor adverse effects on existing residential amenity (traffic noise, headlight glare, privacy and rural character) and on the registered consent-notice character of the estate;	6.1 Adverse effects on the existing community and environment – A through-connection would turn Redmill Road from a quiet dead-end street we thought would stay that way—and what we counted on when we bought the place in May 2025—into a busy shortcut. – It could become a shortcut for folks on upper Redvale Road and the new La Mer View Road development coming and going from the west. This would bring extra traffic, noise, headlights, and safety issues, totally changing the peaceful, private vibe the roughly 20 households there now enjoy, without adding anything the current network doesn't already have. – Redmill Road isn't built or meant for through-traffic. It has private driveways and is casually used by residents, kids, and pets for walking and hanging out. Adding through-traffic would create a real and unnecessary safety risk. – This change would take away the established rural-residential feel and character of the area. 6.2 -Inconsistency with the Council's own consent notice and objectives The character of the Galeo Estate is not just a private choice. It was set and recorded by the Tasman District Council through Consent Notice 11141705.5 (issued under section 221 of the RMA as a condition of subdivision consent RM 080969). This consent notice requires, among -	Remove Stringer road/ Redmill road connection. Retain Redmill Road as a cul-de-sac. • Select a cul-de-sac with a dedicated walking/cycling path as the go-to way to access and connect the site; and • make sure any vehicle link between Stringer Road and Redmill Road goes through a site-specific check for transport, safety, amenity, rural character, the registered consent-notice controls (Consent Notice 11141705.5), stormwater, and how construction might affect existing Redmill Road properties before it can be provided or relied on.

			- (g) provide safely for pedestrians and cyclists; - (h) achieve stormwater neutrality, with no increased runoff, flooding, ponding or erosion affecting existing Redmill Road properties; and - (i) appropriately manage construction effects (traffic management, dust, noise, vibration and sediment). Refer to original submission for more information	other things: outdoor lighting to be hooded or shrouded, pointing downwards, and mounted no higher than 900 mm - following a dark-sky rule (cl f); no fencing on any lot except low post-and- wire or see-through safety fencing (cl g); buildings to blend with the landscape using dull colors (cls b-c); stormwater to flow naturally by gravity into gullies, with permeable surfaces and less runoff (cl k); and no further subdivision of the lots (cl m). - A lit, kerbed, signed road for cars - with headlights lighting the way at night, traffic signs, and a big sealed surface that channels stormwater - just doesn't fit with the dark, open, low-light, nature- focused, low-density vibe the Council itself wanted and noted for these titles. The Council can't logically ask residents to put lights below 900 mm and skip fences "to protect amenity," while also running a lit connector road right through the same neighborhood. - The Council's own reserve plan treats Redmill Road as a place for walking: the Moutere-Waimea Ward Reserve Management Plan sets up a Redmill Road Walkway Reserve (Map 21). Sending diverted through-traffic onto Redmill Road totally clashes with the pedestrian and recreational use the Council has planned here. - The connection also doesn't line up with Plan Change 81's updated objective 11.1.2 (a fully integrated, multi-modal transport system). It mainly serves private cars, not active modes, and changes the character from the current use that being a quiet road and walking area with access to the subdivisions recreation area at the Mount Arthur View walkway. 6.3 -Value for Money & Section 32 - A new sealed connector road of this kind - requiring earthworks on steep topography and, in all likelihood, land acquisition - would be significant expenditure for a connection that, as set out above, adds nothing the network does not already have. It is not the most appropriate method to achieve the relevant objectives (RMA section 32). The Council's section 32 alternatives evaluation assessed zoning options only; it did not evaluate alternative road alignments, so the - connection has not been tested against the "most appropriate method / reasonably practicable options" standard. - The Council's own review shows that T-226 doesn't really stack up well with the bigger growth plan and is mainly backed for cultural reasons. Putting a lot of money into roads to connect this site to the rest of the network isn't really driven by strategy and feels like a waste, especially when budgets are tight and the local infrastructure, including the area's walking paths, is already not well looked after. The Infrastructure Report calls the site infrastructure-neutral, saying the developer will handle onsite servicing and there's "no reticulated network delivery dependency." So, there's no real need for this road from a servicing point of view. 6.4 Premature and unassessed - The connection is not an operative provision of Plan Change 81, and no site-specific assessment of its effects on Redmill Road has been done. It	

				shouldn't be seen as the expected or default result of the rezoning or any future subdivision. If the framework isn't set now, the connection might end up being treated at subdivision stage as already accepted, with the existing community's interests just an afterthought. The plan change is the right time to set that framework.	
OS120.3	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.2 Objectives	Support	Support rezoning of T-226 and support aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information	We do not oppose papakāinga development on ancestral land. Refer to original submission for more information	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. We do not oppose papakāinga development on ancestral land, and we support the aspirations reflected in proposed objectives 10A.2.1 and 10A.2.2. Refer to original submission for more information

Kathryn (Kate) Hanna

Submitter 121

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS121.1	Proposed Plan Change No. 81 > Maps	Amend	Rezone 52 Cupola Crescent to residential	Since 2007 (under Plan Change 10) the TRMP has had policies to enable the southern expansion of Richmond through to Hart Road Policy 6.8.3.10 of the TRMP states the following: "To provide for the expansion over a 20-year timeframe from 2006 to 2026, within a contained footprint and clearly identified by Spur Ridges between Hart Road and Whites Road" Richmond south "limited southward residential expansion between State Highway 6 north of Hope and Hill Street, and a local commercial node, with Stage 1 being defined by Spur Ridges between Hard Road and Whites Road." See original submission for further details.	Submitter is requesting that the remaining land at 52 Cupola Crescent is rezoned from its Rural 1-Deferred Residential to full Residential zoning

Janice M Long

Submitter 122

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS122.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Correct the planning maps to retain Jessie Street as protected Open Space. Reduce MDRZ zoning in Mapua and require adequate on-site parking. Preserve green space and village character.	The submitter considers MDRZ unsuitable due to loss of nature, increased flooding risk, unsafe traffic conditions, and erosion of Mapua's character and amenity.	The submitter opposes MDRZ in Mapua. They state that proposed site coverage and 1.5 m setbacks leave no room for mature trees or landscaping, harming biodiversity and removing Mapua's village character. They are concerned that uniform townhouse development will create repetitive, high-coverage layouts that increase impermeable surfaces and worsen stormwater runoff and flooding. They also oppose the lack of on-site parking, which they believe will cause congestion and restrict emergency

					access. They note that the Jessie Street reserve is not correctly shown or protected in PC81 maps and must remain designated Open Space due to its safety, amenity, and environmental value.

Seaton Palms Limited

Submitter 123

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS123.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Oppose	We OPPOSE the retention of the Rural 1 zoning of our land and SEEK a rezoning of our land (6 and 6A Seaton Valley Road, Māpua) from Rural 1 zone to allow for urban growth. This would be Mixed Business or Rural Residential zoning consistent with the established character of its surroundings for the balance of our land. A Mixed-Use zoning for the Māpua Drive frontage sufficient to accommodate local commercial and community services (including the superette and medical provider uses for which we have been approached)	The submitter states the site is centrally located within Māpua, is surrounded by urban development, has limited productive rural value, and that retaining the Rural 1 zoning is inconsistent with the surrounding environment and future growth of Māpua. The submitter also considers inundation and flood risks can be appropriately managed through engineering design, floor levels, stormwater management and subdivision design, and should not be a reason to retain the Rural 1 zoning.	Opposes the retention of the Rural 1 zoning applying to the site and seeks rezoning of the site from Rural 1 to enable urban development, including Mixed Business, Rural Residential and Mixed-Use zoning.
OS123.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.10: Outline Spatial Plan - Mapua Seaton Valley	Oppose	Include our land within the Māpua urban growth area and any applicable structure plan, providing for a rural residential and/or mixed-use development.	The submitter considers the site suitable for urban growth and development and states its inclusion would align with surrounding urban land use, existing infrastructure, and planned growth in Māpua.	Seeks inclusion of the site within the Māpua urban growth area and any applicable structure plan.
OS123.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.10: Outline Spatial Plan - Mapua Seaton Valley	Amend	Provides for the walkway, open-space, reserve and Seaton Valley Stream ecological-buffer connections, and for integrated stormwater detention and wetland areas, to be delivered through the subdivision and development of the rezoned land, rather than imposed as constraints on, or directed onto, otherwise undeveloped rural land.	The submitter states these outcomes can be delivered through subdivision and development of the site and that the site has an important role in providing connections for the wider walkway, open-space and stormwater network. The submitter states the site plays an important role in the wider catchment and stormwater network and considers future development of the site could provide integrated stormwater detention, wetland areas, overland flow paths and other infrastructure. The submitter also states inundation risks can be managed through development design and stormwater measures.	Seeks provision for walkway, open-space, reserve, ecological buffer, stormwater detention and wetland areas through development of the site.
OS123.4	Proposed Plan Change No. 81	Amend	Makes all consequential amendments to the objectives, policies, rules, planning maps and structure plans necessary to give effect to the above.	The submitter seeks consequential changes to ensure the rezoning, urban growth inclusion, and associated development outcomes are reflected throughout Plan Change 81.	Seeks amendments to plan provisions necessary to implement the requested rezoning and development outcomes.

Kathleen Margaret Dearnley

Submitter 124

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS124.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 61 - Proposed PC81 - Zone - Wakefield Central	Oppose	Consider and plan for the age and historical background of the village	As a longtime resident in a family home I appreciate the safe, friendly and semi rural vibe we could lose along with the close knit community environment which will be adversely impacted. the village lifestyle I enjoy (and the reason many choose to move to Wakefield) will be destroyed	Opposes densification of Wakefield
OS124.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Recommends 15-20 houses per hectare would be more in keeping for providing more homes, especially for those downsizing or needing a small dwelling.	More density might encourage cheaper builds. Allowance needs to be made for residents cars (often large) and more than one per household or if they have no car, space for mobility scooter or E bike. Crammed in townhouse type builds mean noise, reduced privacy, reduced sun hours (falls from walking on frosty paths).	Opposes thirty houses per hectare
OS124.3	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values	Oppose		At the moment we are blessed in our area with visiting birdlife, kereru and tui are frequent visitors especially when kowhai flowering. Intensification reduces space for trees and gardens. I worry about these birds flying into the reflecting glass windows (this happens occasionally already) with 2-3 storied builds	Concerned that densification will reduce the birdlife visiting in Wakefield
OS124.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose		I believe that there is a wide range of homes in the area labelled as "older homes of little value". There are homes over 100 years old but they are generally well maintained and much desired (ask the real estate agents). Most were built from locally milled timber and erected by excellent builders of the time. We have a variety of homes, all ages, styles; units, flats and stand alone. And different section sizes.	Submitter notes that housing diversity is already present in Wakefield
OS124.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.3 Visual and Aesthetic Character	Oppose	Guidelines for developers which compliment existing Wakefield character	The current style and colour of new builds (especially if 2-3 stories high and black) will clash with the semi rural, relaxed character my village has (commented on by visitors) (look at how modern black cladding has spoilt the old Four Square building, it once had character and was chosen to be used for a tv ad).	Opposes the current style and colour of new builds
OS124.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	Ensure planning is done for enough waste water and fresh water provisions and access for emergency services for newly developed areas	This plan is not an efficient use of land as it will impact on our existing infrastructure: waste water (climate change rain downpours), droughts and summer water restrictions, more cars parked on our narrow streets causing safety issues and difficulties on bin days plus increased traffic with delays at intersections. Access by emergency vehicles could be difficult with cars on both sides of the street. Our first responders come in the big firetruck.	Opposes placing additional pressure on existing infrastructure
OS124.8	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Height restriction of 8 metres in Wakefield	A height restriction of 8 metres (essential) would lessen the impact on the pleasant neighbourhood feel we have. Whitby Road is the road into and through Wakefield and I would hate it to look like Gladstone Road, not a welcoming feel.	Proposes a height restriction of 8 metres

Nelson Tasman branch of Forest and Bird

Submitter 125

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS125.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Treat the wetland and stormwater area as one protected wetland; require ecologist-led design and native planting; vest the wetland in Council; establish native buffers and setbacks; and apply a strict cat-exclusion zone with mandatory containment.	The submitter considers the wetland an important ecological asset requiring expert design, native planting, strong protection measures, and strict cat management to safeguard wildlife.	Support in part, suggest strengthening. The submitter seeks stronger protection for the Seaton Valley wetland. They state the mapped wetland and stormwater retention area should function as one integrated wetland and be designed and planted by a qualified wetland ecologist funded by the developer, then vested in Council. They note species such as banded rail and marsh crake are likely to use the wetland and request native tree buffers and setbacks to protect wildlife from pets and human intrusion.
OS125.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Treat the wetland and stormwater area as one protected wetland; require ecologist-led design and native planting; vest the wetland in Council; establish native buffers and setbacks; and apply a strict cat-exclusion zone with mandatory containment.	The submitter considers the wetland an important ecological asset requiring expert design, native planting, strong protection measures, and strict cat management to safeguard wildlife.	Seek a strict cat-exclusion zone, stating that Council's current wording is unclear and that cats of any age pose risks to wildlife.

Carl Stockton

Submitter 126

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS126.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Reconsider Change Plan 81.	The submitter is concerned about the potential negative impacts of Plan Change 81 on the Mapua community.	The submitter opposes Plan Change 81.
OS126.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 32 - Proposed PC81 - Zone - Mapua, Aranui Rd	Oppose	Reconsider the proposed residential development in and around Māpua Village.	The submitter considers the proposed residential development is inconsistent with the current character of Māpua Village and could adversely affect the community.	The submitter opposes the proposed residential development in and around Māpua Village.
OS126.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 33 - Proposed PC81 - Zone - Mapua, Cnr Aranui Rd - Tahi St	Oppose	Reconsider the proposed residential development in and around Māpua Village.	The submitter considers the proposed residential development is inconsistent with the current character of Māpua Village and could adversely affect the community.	The submitter opposes the proposed residential development in and around Māpua Village.
OS126.5	Proposed Plan Change No. 81 > Maps > Zone Maps > 37 - Proposed PC81 - Zone - Mapua, Stafford Dr	Oppose	Reconsider the proposed industrial development in and around Māpua Village.	The submitter considers industrial activity near residential areas could negatively affect the community.	The submitter opposes the proposed industrial development in and around Māpua Village.
OS126.7	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Oppose	Reconsider Change Plan 81.	The submitter considers increased residential and industrial activity could lead to increased noise, traffic, pollution and a reduced quality of life for residents.	The submitter is concerned that residential and industrial development could increase noise, traffic and pollution.
OS126.8	Proposed Plan Change No. 81 > Chapter 16: General Rules	Amend	Reconsider Change Plan 81 and protect the natural environment. Focus on sustainable development strategies that prioritise community wellbeing and environmental preservation, and ensure development is carefully planned taking residents' needs and concerns into account.	The submitter states that the proposed development would have detrimental effects on the natural environment, including nearby wetlands and waterways that support ecosystems and wildlife. The submitter considers development should prioritise the wellbeing of the community and preservation of	The submitter seeks protection of the natural environment, including wetlands and waterways, from the effects of development.

				the environment and should consider the needs and concerns of residents.	The submitter seeks development that is carefully planned and takes into account the needs and concerns of residents.

Andrew and Wendy Neame

Submitter 127

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS127.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Reject MDRZ zone in their neighbourhood. Retain low-density zoning.	The submitters consider the proposed intensification incompatible with established residential character, harmful to amenity and property values, and unsupported by current infrastructure capacity.	The submitters **oppose** the MDRZ zoning proposal in their neighbourhood. They seek to **reject** the MDRZ zone and **retain low-density zoning**. Their main concerns are that intensification: • Conflicts with established residential character. • Harms amenity and property values. • Is not supported by current infrastructure capacity.
OS127.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Reject MDRZ and intensification provisions affecting their neighbourhood. Retain low-density zoning. Undertake a full assessment of privacy, sunlight, character, traffic, parking, and infrastructure impacts. Strengthen height, density, setback, and site coverage controls to protect existing residents.	The submitters consider the proposed intensification incompatible with established residential character, harmful to amenity and property values, and unsupported by current infrastructure capacity.	The submitters oppose PC81 intensification provisions, stating they built their home with the reasonable expectation of a stable, low-density residential environment. They are concerned that multi-storey and high-density development will reduce privacy, sunlight, and outlook, and fundamentally alter neighbourhood character. They believe intensification will negatively affect amenity values, property investment expectations, and create congestion, parking pressure, and infrastructure strain. They consider the proposed changes unfair to existing residents and lacking appropriate transition or protection for established communities.

Fire and Emergency New Zealand

Submitter 128

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS128.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth > 6.2.3 Policies	Amend	Insert as follows: *The risk from natural hazards to people, property and the environment associated with land use, subdivision and development is acceptable.*	Fire and Emergency proposes a new objective which requires, when assessing whether the natural hazard risks associated with subdivision or land use are acceptable, and identifying risks that must be avoided or mitigated. Related relief is sought under the	Insert new policy to 6.2.3.X. Fire and Emergency proposes a new objective which requires, when assessing whether the natural hazard risks associated with subdivision or land use are acceptable, and identifying risks that must be avoided or

				Schedule 16.3A, the assessment criteria for subdivisions, to ensure these risks are appropriately considered at resource consent stage.	mitigated. Related relief is sought under the Schedule 16.3A, the assessment criteria for subdivisions, to ensure these risks are appropriately considered at resource consent stage.
OS128.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Retain as notified.	As set out in Policy 6.3.3.1A, Fire and Emergency recognises that to meet minimum residential housing land capacity requirements, residential intensification may require the upgrade of infrastructure that may not be programmed. This may require developer-led or temporary solutions to achieve adequate infrastructure capacity. Fire and Emergency is supportive of this approach, subject to relief sought elsewhere which requires all residential intensification, sought through both land use and subdivision applications, to demonstrate compliance with SNZ PAS 4509: 2008 firefighting water supply requirements. These requirements must also extend to interim solutions to safeguard the health and safety of the public.	Support in part. As set out in Policy 6.3.3.1A, Fire and Emergency recognises that to meet minimum residential housing land capacity requirements, residential intensification may require the upgrade of infrastructure that may not be programmed. This may require developer-led or temporary solutions to achieve adequate infrastructure capacity. Fire and Emergency is supportive of this approach, subject to relief sought elsewhere which requires all residential intensification, sought through both land use and subdivision applications, to demonstrate compliance with SNZ PAS 4509: 2008 firefighting water supply requirements. These requirements must also extend to interim solutions to safeguard the health and safety of the public.
OS128.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Amend as follows: *When making decisions on resource consent applications, development that imposes additional load or pressure on infrastructure is avoided unless the necessary infrastructure is in place to service it, including, where relevant* *a. any intersections, connections and upgrades of roads to an appropriate standard; and* *b. servicing infrastructure (including wastewater, water supply and stormwater) to an appropriate standard.* *For the purposes of this policy "appropriate standard" refers <u>to the mandatory standards of,</u> ~~but is not limited to,~~ the Nelson Tasman Land Development Manual.*	Fire and Emergency is supportive of Policy 6.3.3.1C in so far as it provides clear direction to decision makers to decline applications for development which cannot be appropriately serviced. The policy states that for the purposes of determining whether development is supported by servicing infrastructure (including water supply) to an appropriate standard, this "refers to, but is not limited to the Nelson Tasman Land Development Manual (LDM)". As detailed in the covering letter, whilst it is acknowledged that the LDM requires water reticulation to be designed in accordance with SNZ PAS 4509, Policy 6.3.3.1C is unclear as to whether all mandatory servicing requirements of the LDM are required to be met to be consistent with this policy. As notified, the policy also suggests that there may be other means of demonstrating an "appropriate standard"	Support in part. Support in part 6.3.3.1C. Seek amendment to 6.3.3.1C as follows: *When making decisions on resource consent applications, development that imposes additional load or pressure on infrastructure is avoided unless the necessary infrastructure is in place to service it, including, where relevant* *a. any intersections, connections and upgrades of roads to an appropriate standard; and* *b. servicing infrastructure (including wastewater, water supply and stormwater) to an appropriate standard.* *For the purposes of this policy "appropriate standard" refers <u>to the mandatory standards of,</u> ~~but is not limited to,~~ the Nelson Tasman Land Development Manual.*

				with respect to three waters servicing. Accordingly, it is essential that the district-wide urban intensification policies, rules and standards provide clear and concise direction as to an appropriate means of compliance with respect to water supply and firefighting water supply requirements, including temporary solutions. Refer to original submission for more information	Refer to original submission for more information
OS128.4	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.2 Objective	Amend	Amend as follows: *A safe, efficient and resilient transport system that integrates with land use, supports a range of travel modes <u>including emergency service vehicles</u>, and where any adverse effects of the subdivision, use or development of land on the transport system are avoided, remedied or mitigated.*	Fire and Emergency supports Objective 11.1.2 insofar as it requires a safe, efficient and resilient transport system which is fundamental for efficient and effective emergency service response and should be considered as a critical part of the district's transportation policy framework. that provides of range of transport options. It is vital that the transportation network provides for the needs of emergency service vehicles.	Support in part. It is vital that the transportation network provides for the needs of emergency service vehicles. Amend as follows: *A safe, efficient and resilient transport system that integrates with land use, supports a range of travel modes <u>including emergency service vehicles</u>, and where any adverse effects of the subdivision, use or development of land on the transport system are avoided, remedied or mitigated.*
OS128.5	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.3 Policies	Amend	Include new policy as follows: *<u>Ensure that the specific needs of emergency response operations are implemented at the building design stage.</u>*	As per the relief sought under Objective 11.1.2, Fire and Emergency requests explicit reference to the provision of emergency responder access within the transport network.	Insert new policy. As per the relief sought under Objective 11.1.2, Fire and Emergency requests explicit reference to the provision of emergency responder access within the transport network. *<u>Ensure that the specific needs of emergency response operations are implemented at the building design stage.</u>* -
OS128.6	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.3 Policies	Amend	Amend as follows: *Except in the Medium Density Residential Zone, to ensure that all subdivision design including the position of site boundaries, has the ability to provide each allotment with vehicle access and a vehicle crossing sited to avoid adverse effects on the safety and efficiency of the road network.*	Subject to the relief sought under Chapters 11 and 16.2 of PC81, Fire and Emergency supports TDC's preference to enable MDRZ development which does not require traditional vehicle access	Support in part. Subject to the relief sought under Chapters 11 and 16.2 of PC81, Fire and Emergency supports TDC's preference to enable MDRZ development which does not require traditional vehicle access Amend as follows: *Except in the Medium Density Residential Zone, to ensure that all subdivision design including the position of site boundaries, has the ability to provide each allotment with vehicle access and a vehicle crossing*

					sited to avoid adverse effects on the safety and efficiency of the road network. Refer to original submission for more information.
OS128.7	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.3 Policies	Amend	Amend as follows: *Ensure that site access in the Medium Density Residential Zone is designed and located to provide safe entry and exit for pedestrians, micromobility users or vehicles from the site to a road, including access for emergency services and appliances, without compromising the safety or efficiency of the road network <u>and emergency services</u>.*	Fire and Emergency supports the policy insofar it aims to ensure that safety and efficiency from site to road is provided for emergency services.	Support in part. Fire and Emergency supports the policy insofar it aims to ensure that safety and efficiency from site to road is provided for emergency services. Amend as follows: *Ensure that site access in the Medium Density Residential Zone is designed and located to provide safe entry and exit for pedestrians, micromobility users or vehicles from the site to a road, including access for emergency services and appliances, without compromising the safety or efficiency of the road network <u>and emergency services</u>.* Refer to original submission for more information
OS128.8	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.3 Policies	Amend	Amend as follows: *To ensure that adequate and efficient parking, turning for vehicles and loading spaces are provided, either on individual sites or collectively, to avoid or mitigate adverse effects on the safety and efficiency of the road network. Any use of off-site facilities shall not compromise pedestrian, micromobility, cycle or vehicle safety, or the safe and efficient operation of the road network <u>and emergency services.</u>*	Fire and Emergency supports the policy insofar it aims to ensure that safety and efficiency from site to road is provided for emergency services.	Support in part. Amend policy so that emergency services safety and efficiency from site to road is provided for. Refer to original submission for more information.
OS128.9	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic) > 16.2.2 Land Use > 16.2.2.1 Permitted Activities (Land Use - Vehicle Access Considerations)	Amend	Amend as follows: *ad. Where, under Condition aa., a vehicle access is not provided, the micromobility access shall:* *i. be provided from the road carriageway to the front door; and* *ii. have a ~~1.83~~m minimum sealed width; and* *iii. exceed the maximum gradient specified in Table 16.2B; and* *iv. be unobstructed (including opening windows) for its full length up to a height of ~~2.~~4m; and* *v. where the micromobility access includes steps, provide a step-free option as specified in NZS 4121:2001: Design for access and mobility: Buildings and associated facilities; and* *vi. be illuminated during the hours of darkness<u>; and</u>* *vii. <u>be no more than 75m in length measured from the road boundary to the furthest point of any existing building or proposed building platform on the site.</u>*	Fire and Emergency require a minimum 4m width for emergency vehicles to be able to access sites. In the case where vehicle access is not provided in the MDRZ, the proposed minimum width of 1.8m would significantly impact the ability of emergency responders to provide effective and efficient assistance. Therefore, Fire and Emergency seeks that the width of micromobility-only access, where it is the sole access to the site, is a minimum of 3m to provide for the manoeuvring of emergency service personnel and equipment for firefighting, medical, rescue and other emergency responses.	Oppose in part. Fire and Emergency is concerned with micromobility-only access developments not providing for emergency responder access. The proposed design standards are not adequate for emergency responders to undertake operational activities including movement of ladders and hoses. Make amendments to width and height maximums so that Fire and Emergency can provide effective and efficient assistance.

			And Any other consequential amendments required to give effect to this permitted activity standard.	Additionally, fire appliances require a 4m height clearance and a maximum accessway length of 75m. This is critical to allow for sufficient and effective hose run from the road in an emergency which can access all sides of a building. The 75m length should therefore be measured between the road boundary and the furthest point of the building or building platform. This is consistent with Acceptable Solution C/AS1 and C/AS2. In general, Fire and Emergency is concerned with micromobility-only access developments not providing for emergency responder access. The proposed design standards are not adequate for emergency responders to undertake operational activities including movement of ladders and hoses. Fire and Emergency is able to provide information on this, if required.	
OS128.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic) > 16.2.2 Land Use > 16.2.2.6 Restricted Discretionary Activities (Land Use - General)	Amend	Amend as follows: *Shared vehicle access for more than 20 dwellings – Medium Density Residential Zone* *5A. In the Medium Density Residential Zone, a shared vehicle access serving more than 20 dwellings is restricted to the following matters of discretion:* *a. The extent to which the proposal:* *i. Minimises adverse effects on the safe and efficient functioning of the transport network, users and infrastructure.* *ii. Provides for the accessibility needs of all users of the site.* *iii. Provides for the operational requirements of the proposal such as waste collection.* *<u>iv. Provides for the operational and access requirements of emergency services.</u>* *b. […]* Insert consequential relief:	Fire and Emergency supports the policy insofar it aims to ensure that safe and efficient access from road to all dwellings is provided for emergency services. However, Fire and Emergency is concerned that shared vehicle access for more than 20 dwellings in a MDRZ may pose emergency service access risks to developments under this rule. It is unclear what the minimum standards that are required for share vehicle access for more than 20 dwellings. As the rule intends to provide for larger residential developments, it is crucial for emergency responders to be able to access these dwellings safely and efficiently. Therefore, consideration shall be given to the extent to which the proposal provides for emergency service access.	Support in part. Fire and Emergency is concerned that shared vehicle access for more than 20 dwellings in a MDRZ may pose emergency service access risks to developments under this rule. It is unclear what the minimum standards that are required for share vehicle access for more than 20 dwellings. As the rule intends to provide for larger residential developments, it is crucial for emergency responders to be able to access these dwellings safely and efficiently. Therefore, consideration shall be given to the extent to which the proposal provides for emergency service access.

			An equivalent standard must also be provided which provides for the operational and access requirements of emergency services, as per the minimum vehicle access requirements specified in the covering letter.		
OS128.11	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic) > 16.2.2 Land Use > 16.2.2.6 Restricted Discretionary Activities (Land Use - General)	Amend	Fire and Emergency supports Rule 16.2.2.6.27 insofar that the design of micromobility access maintains safe access to all sites for emergency services.	Amend as follows: *27. In the Medium Density Residential, a micromobility users' access that does not meet the permitted activity standards (16.2.2.1) is restricted to the following matters of discretion* *a. the extent to which the safety of pedestrians and micromobility users, both on and off the site will be affected including;* *i. the effects of lighting on pedestrian safety, wayfinding and access, including whether the number, location, design and orientation of light fittings and light support structures provide adequate lighting for the safety and wayfinding of people; and Note: Adequate lighting is the amount of lighting at eye level for a person with average eyesight so they can identify any potential threat approaching them from at least 15m.* *ii. Crime Prevention Through Environmental Design principles.* *b. The extent to which the proposal minimises conflicts between users both within the site and any adjoining road.* *c. The extent to which the proposal priorities the accessibility needs of the mobility and vision-impaired, young children and the elderly.* *<u>d. The extent to which the proposal can provide for safe and adequate access for emergency services.</u>*	support in part. Amend 16.2.2.6(27) so that the design of micromobility access maintains safe access to all sites for emergency services.
OS128.12	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3 Residential Zone > 16.3.3.1 Controlled Subdivision (Residential Zone - Standard Density Development)	Amend	Retain as notified, subject to relief sought under Schedule 16.3C.	Rule 16.3.3.1 provides for the subdivision of development in the Residential Zone as a controlled activity, subject to conditions. Related conditions state that development should be provided with services as set out in Schedule 16.3C. Fire and Emergency supports this rule, subject to the separate relief sought under Schedule 16.3C.	Support in part. Rule 16.3.3.1 provides for the subdivision of development in the Residential Zone as a controlled activity, subject to conditions. Related conditions state that development should be provided with services as set out in Schedule 16.3C. Fire and Emergency supports this rule, subject to the separate relief sought under Schedule 16.3C.

OS128.13	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.4 Business and Industrial Zones > 16.3.4.1 Controlled Subdivision (Business and Industrial Zones)	Amend	Retain as notified, subject to relief sought under Schedule 16.3C.	This rule provides for the subdivision of development Business and Industrial Zones as a controlled activity, subject to conditions. Related conditions state that development should be provided with services as set out in Schedule 16.3C. Fire and Emergency supports this rule, subject to the separate relief sought under Schedule 16.3C.	Support in part. This rule provides for the subdivision of development Business and Industrial Zones as a controlled activity, subject to conditions. Related conditions state that development should be provided with services as set out in Schedule 16.3C. Fire and Emergency supports this rule, subject to the separate relief sought under Schedule 16.3C.
OS128.14	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Amend	Retain as notified, to subject to related relief sought.	Fire and Emergency supports Rule 16.3.2.5 in so far as it requires subdivision in any zone subject to deferred zone rules, or where deferred zoning has been removed, to provide services either (a) in accordance with the mandatory standards of the LDM, or the services must meet the requirements of the deferred zone rules as set out in Rule 17.14.2. Rule 17.14.2 enables the release of deferred land for development where specified infrastructure is “delivered”, including water supply upgrades. Once land is released, the decision makers must refer to underlying zone and subdivision provisions. Subject to the relief sought to secure a compliant firefighting water supply across all underlying zone and subdivision provisions.	Support in part. Fire and Emergency supports Rule 16.3.2.5 because it requires subdivision on deferred land to provide services in accordance with the LDM or Rule 17.14.2 requirements. It supports the release of deferred land once specified infrastructure, including water supply upgrades, is delivered, subject to securing a compliant firefighting water supply through the underlying zone and subdivision provisions. Refer to original submission for more information.
OS128.15	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Amend	Amend as follows: *Miscellaneous* *5. The degree of compliance with the mandatory standards of the Nelson Tasman* *Land Development Manual and Schedule 16.3C.* ….. *Traffic* *32. The provision of emergency services access.* Or To similar effect. And Any other consequential amendments required to give effect to these provisions.	Fire and Emergency supports the land-use led approach to development of the MDRZ, as identified in Rule 16.3.3A. This approach provides an opportunity for the specific needs of emergency response operations to be implemented at the building design stage. Consistent with the relief sought under Chapters 6, 11, 16 and 17, amendments to Rule 16.3.3A are sought to ensure that appropriate consideration is given to the provision of emergency services access and firefighting water supply for all new residential buildings in the MDRZ.	Support in part. Consistent with the relief sought under Chapters 6, 11, 16 and 17, amendments to Rule 16.3.3A are sought to ensure that appropriate consideration is given to the provision of emergency services access and firefighting water supply for all new residential buildings in the MDRZ.

OS128.16	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	Amend as follows: Servicing *19A. The requirements of Schedule 16.3C.* Or To similar effect. And Insert consequential relief to 'Access and Transport' matters of control to provide for emergency services access requirements, as per relief sought under Chapter 16.2, and any other consequential amendments required to give effect to this new matter of control.	Fire and Emergency supports Rule 16.3.3A.2 insofar as the matters of control require compliance with servicing provisions, which requires consideration of the "availability and provision of services". The rule, and cascading activity status under this chapter, however, do not appear to require compliance with the related services requirements stipulated under Schedule 16.3C. Relief is therefore sought to ensure that minimum three waters servicing requirements are met for all subdivisions in the MDRZ. Relief is also required to the matters of control to reflect the emergency access relief sought all Chapter 16.2.	Support in part. Fire and Emergency supports Rule 16.3.3A.2 because it requires consideration of the availability and provision of services through the servicing provisions. It seeks relief to ensure minimum three waters servicing requirements are met for all MDRZ subdivisions and that the matters of control reflect the emergency access relief sought under Chapter 16.2.
OS128.17	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Amend as follows: *(3) The extent to which the effects of natural hazards within and beyond the boundaries of the site, including wildfire risk and coastal, flood, stormwater, geotechnical or earthquake hazards will be avoided or mitigated.* *Advice note for mitigation of wildfire risk* *Consideration should be given to incorporating wildfire safety principles, such as* *planting species selection, vegetation management, defensible space, fire-resistant* *building materials, adequate water supplies, and suitable emergency* *access to improve community resilience. This includes both protecting urban areas* *from wildfire and protecting the natural environment from urban activities which* *start fires.* *Refer to Fire and Emergency's Rural Interface brochure:* *https://www.fireandemergency.nz/assets/Documents/At-home/Rural-Interface-Brochure.pdf* *(11) Where a connection to Council's reticulated water supply systems is available,* *all new allotments must be provided with an ~~the~~ adequate provision of potable* *water and must provide water for firefighting in accordance with the New Zealand* *Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.* *Where a connection to Council's reticulated water supply systems is not available,* *all allotments must comply with the water supply requirements of the New*	When considering an application for a subdivision consent, the Council will have regard to the criteria in Schedule 16.3A. These criteria include the adequate provision of potable water and water for firefighting. Criterion 11 does not, however, specify how adequate provision of firefighting water supply is to be determined as part of any assessment of a subdivision consent under Schedule 16.3A. This creates ambiguity for both applicants and decision makers. Fire and Emergency therefore seeks relief to provide a clear and concise expected method of compliance. As criterion 11 appears to be a general consideration for subdivisions across all zones, it does not stipulate whether water servicing is required to connect to the Council's reticulated network. The relief sought therefore seeks to provide certainty to applicants and decision makers in a reticulated and non-reticulated scenario. Whilst already part of the operative TRMP, Fire and Emergency also support assessment criterion 3 which requires Council to have regard to the extent to which the effects of natural hazards within and beyond the boundaries of the site, including wildfire risk and coastal, flood, stormwater, geotechnical or	support in part. Fire and Emergency seeks relief to provide a clear method for determining adequate firefighting water supply under Schedule 16.3A, giving greater certainty to applicants and decision-makers in both reticulated and non-reticulated areas. It also supports assessment criterion 3 relating to natural hazards, including wildfire risk, and recommends guidance for applicants on measures to mitigate wildfire risk. Refer to the original submission for more information.

			Zealand *Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.* Or To similar effect. And Any other consequential amendments required to give effect to this assessment criterion under both the subdivision and land use provisions of the TRMP at the urban-rural interface.	earthquake hazards will be avoided or mitigated. As detailed in the covering letter, new development at the urban-rural interface has the potential to increase wildfire risk and therefore due consideration must be given to wildfire risk and potential mitigation measures. Fire and Emergency does however recommend an advice note, or similar, to guide applicants on potential ways to mitigate wildfire risk.	
OS128.18	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3C: Services Required on Subdivision in Certain Zones	Amend	*This schedule applies to Central Business, Commercial, Mixed Business, Tourist Services, Heavy and Light Industrial and Rural Industrial zones, Medium Density Residential Zone and the Residential Zone ~~in the Richmond South, Richmond West, Richmond East, Richmond Intensive, Brightwater, Wakefield, Motueka West and Māpua development areas (excluding the Residential Coastal Zone),~~ and the Rural Residential Serviced Zone ~~in the Richmond East and Māpua development areas.~~* *Water Supply - The land to be subdivided is connected to a Council potable water supply reticulation that is capable of providing a potable water supply for each allotment and sufficient water for fire-fighting purposes, unless in the Rural Residential Zone (other than the Rural Residential Serviced Zone in the Richmond East and Māpua development areas), rule 17.8.3.1(m) is complied with. <u>For the purposes of demonstrating sufficient water for firefighting purposes, water must be supplied in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.</u>* Or To similar effect. And Any other consequential amendments required to give effect to this provision.	Fire and Emergency supports Schedule 16.3C insofar as all new urban residential and industrial subdivisions enabled by PC81 will be required to deliver sufficient water for firefighting purposes for all new lots within specified zones, including the MDRZ. However, the requirements of the Schedule only apply to specified development areas and do not necessarily apply to all areas where urban development is enabled. Relief is therefore sought to capture all district-wide urban development scenarios. Alternatively, clarification is required from TDC that the applicability of the Schedule extends to all built development enabled by PC81 whether identical servicing requirements are enforced via alternative provisions. With respect to water supply, the Schedule requires “the land to be subdivided [to be] connected to a Council potable water supply reticulation that is capable of providing a potable water supply for each allotment and sufficient water for fire-fighting purposes, unless in the Rural Residential Zone (other than the Rural Residential Serviced Zone in the Richmond East and Mapua development areas), rule 17.8.3.1.m. is complied with.” Criterion 11 does not expressly stipulate how a sufficient reticulated water supply is capable of being provided. This creates	Support in part. Fire and Emergency supports Schedule 16.3C because it requires new urban residential and industrial subdivisions to provide sufficient water for firefighting purposes. The requirements of the Schedule only apply to specified development areas and do not necessarily apply to all areas where urban development is enabled. Relief is therefore sought to capture all district-wide urban development scenarios. Alternatively, clarification is required from TDC that the applicability of the Schedule extends to all built development enabled by PC81 whether identical servicing requirements are enforced via alternative provisions. Refer to original submission for more information .

				ambiguity for both applicants and decision makers. Fire and Emergency therefore seek relief to provide a clear and concise expected method of compliance with respect to a reticulated connection.	
OS128.19	Proposed Plan Change No. 81 > Chapter 17: Zone Rules	Amend	Insert new 'Land Use' rule and new 'Matter of discretion' across all zones within the scope of PC81: *Firefighting water supply servicing* *Provision for sufficient water supply and access to water supplies for firefighting shall be made available to all new buildings in accordance with the New Zealand Fire Service Firefighting Water Supplies Code of Practice (SNZ PAS 4509:2008).* *Matters of discretion are:* *The extent of consistency with the requirements of the New Zealand Fire Service Firefighting Water Supplies Code of Practice SNZ PAS 4509:2008.* Or To similar effect. And Any other consequential amendments required to give effect to this new standard.	Whilst the TRMP has current provisions which require subdivision activities to deliver a firefighting water supply, this does not appear to extend to land use proposals. As discussed in the covering letter, it is essential that all new urban development is required to be serviced with an adequate firefighting water supply and this must also capture permitted land use activities which are proposed to be enabled by PC81. The TRMP Zone rules include existing provisions for wastewater servicing and stormwater management. The new Papakāinga Development Zone also identifies a requirement to service new built development with firefighting water – the matters of discretion do not however confirm how a compliant firefighting water supply can be delivered. Accordingly, it is also entirely consistent with the format of the operative TRMP to include water supply servicing requirements.	Insert new rule across all zones. As discussed in the covering letter, it is essential that all new urban development is required to be serviced with an adequate firefighting water supply and this must also capture permitted land use activities which are proposed to be enabled by PC81. Refer to original submission for more information.
OS128.20	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.14 Deferred Zone Rules	Amend	Retain as notified, subject to related relief sought.	Fire and Emergency supports this rule in so far as deferred urban growth sites, as identified in Schedule 17.14A, are required to deliver all infrastructure upgrades specified in Column C of the Schedule, which include water supply upgrades, prior to the removal of deferral land status. The rule confirms that this applies to both land use and subdivision applications. The rule provides a definition for "delivered" infrastructure which states that such infrastructure must either be (i) physically constructed; or (ii) Council and a landowner/developer have an agreement that the infrastructure will be constructed within three years of the date of the agreement. Where infrastructure is "delivered", the deferred land is essentially released for urban development and defers to Column	support in part. Fire and Emergency supports this rule because it requires deferred urban growth sites identified in Schedule 17.14A to deliver specified infrastructure upgrades, including water supply upgrades, before deferred land status can be removed. The rule applies to both land use and subdivision applications and defines infrastructure as "delivered" when it is either physically constructed or subject to an agreement requiring construction within three years. Once the required infrastructure is delivered, the land can be released for urban development and assessed against the relevant underlying zone and subdivision provisions. Fire and Emergency supports this approach, subject to relief ensuring that a compliant firefighting water supply is physically in place before development proceeds.

				G of the Schedule, which requires review of specified chapters of the TRMP including the underlying zone rules. Fire and Emergency support this approach subject to the relief sought across all related zones and district-wide subdivision standards, to ensure that a complaint firefighting water supply is physically delivered prior to construction of the enabled development.	

Julie McIntosh

Submitter 129

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS129.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Reconsider PC81. Prioritise infrastructure upgrades before any intensification.	The submitter considers PC81 harmful to residential amenity, neighbourhood character, infrastructure capacity, and the expectations of existing homeowners.	Oppose. The existing infrastructure cannot cope with additional vehicles, traffic, and servicing demands. They are concerned that allowing buildings up to 14 m high in quiet suburban streets will cause loss of sunlight, privacy, amenity, and property value. Intensification will increase noise, congestion, and unfairly impact residents who purchased homes expecting a stable suburban environment. Existing neighbourhoods must be protected before any intensification occurs.
OS129.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Protect existing suburban neighbourhoods through stronger height, density, setback, and amenity controls	The submitter considers PC81 harmful to residential amenity, neighbourhood character, infrastructure capacity, and the expectations of existing homeowners.	Allowing buildings up to 14 m high in quiet suburban streets will cause loss of sunlight, privacy, amenity, and property value. Intensification will increase noise, congestion, and unfairly impact residents who purchased homes expecting a stable suburban environment. Existing neighbourhoods must be protected before any intensification occurs.

Brent John Stanger

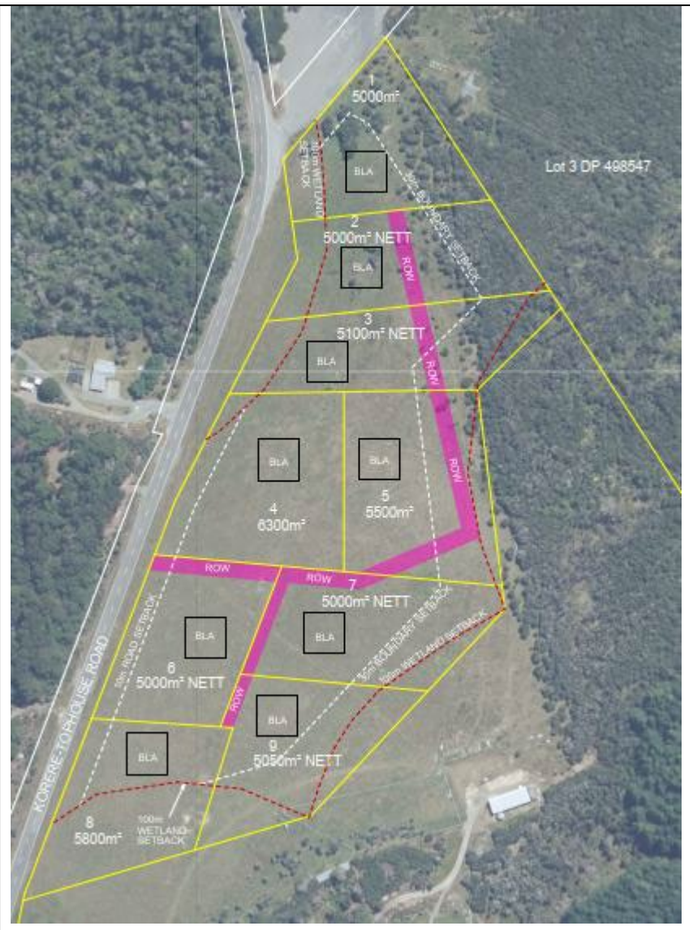
Submitter 130

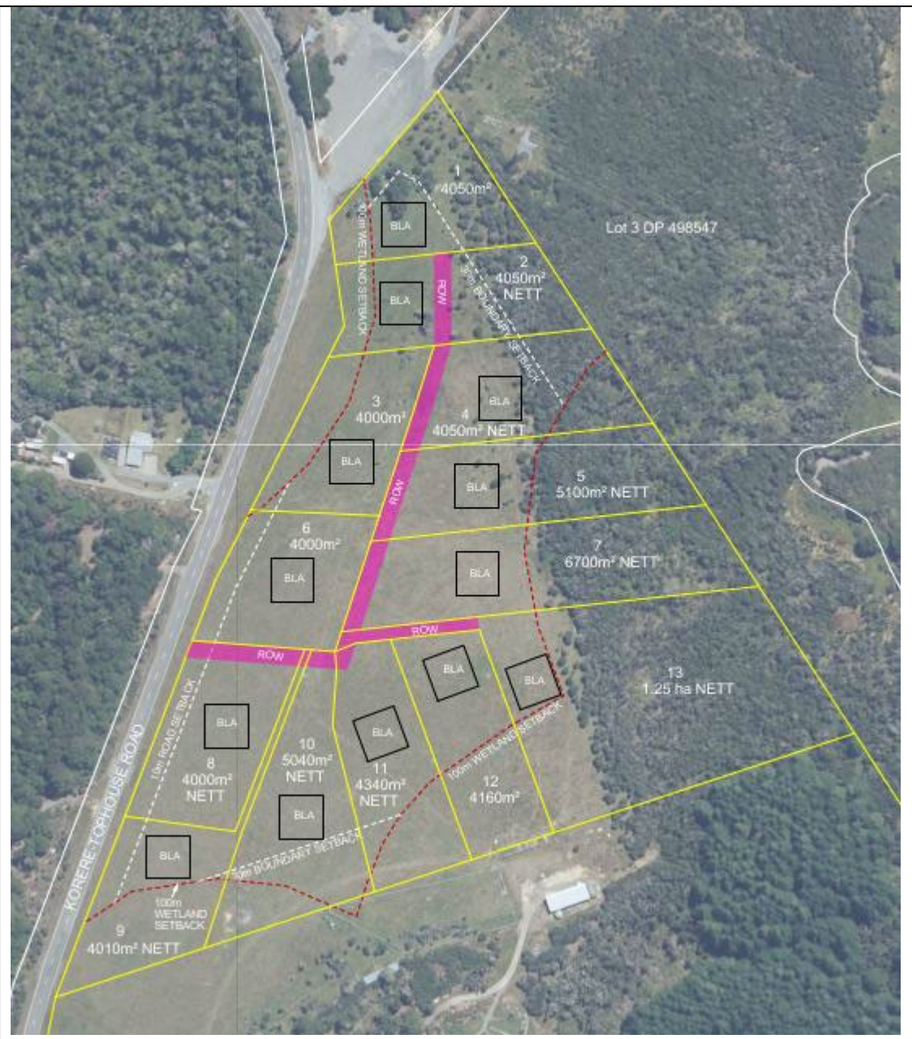
Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS130.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Reduce the limit.	So that sunlight and privacy is adequately mitigated.	Oppose the proposed height limit of 11m in the MDRZ, noting loss of sunlight and privacy which cannot be adequately mitigated.
OS130.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Rezone all of Richmond to the new building and site coverage standards, to make it fair for everyone.	To achieve intensification fairly.	Support the inclusion of increased building and site coverage required in the MDRZ as this will result in intensification. Suggest all areas in Richmond should be rezoned to the new building and site coverage standards, to make it fair for everyone.

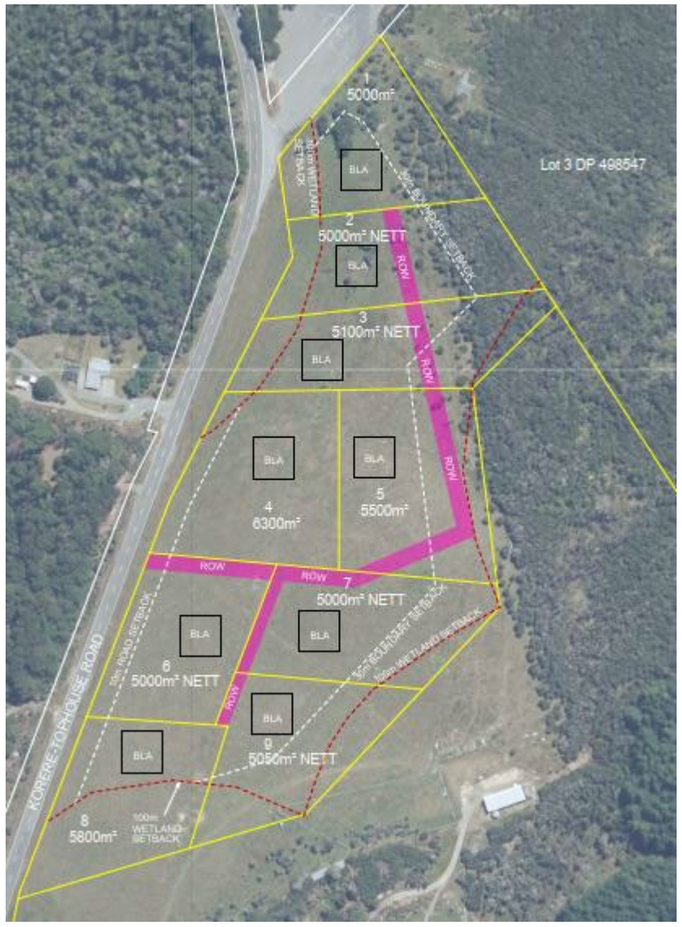
Jack Richard and Dana Faye Bauer

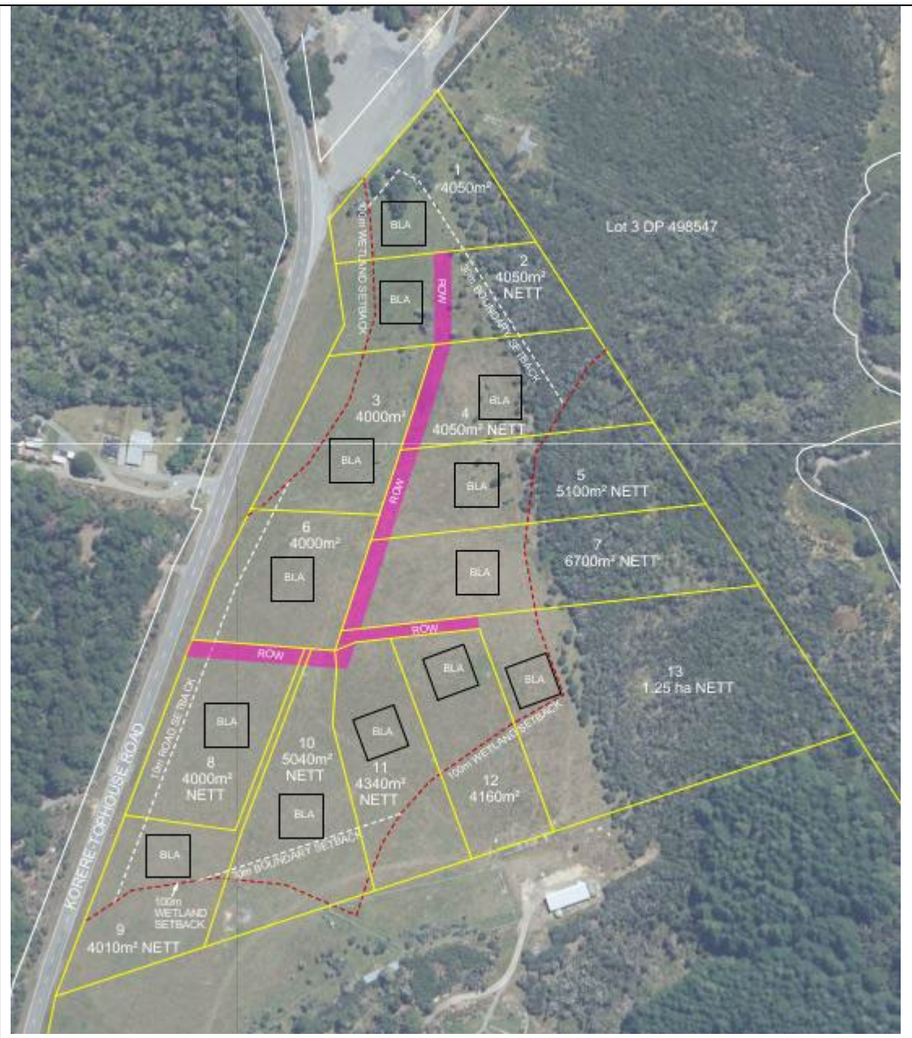
Submitter 131

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS131.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 54 - Proposed PC81 - Zone - Korere-Tophouse Rd	Amend	Plan Change 81 be approved insofar as it rezones part of Lot 8 DP 12705 from Rural 2 to Rural Residential. The southern and eastern Rural Residential zone boundaries affecting Lot 8 DP 12705 be amended as shown in Appendix 1 of this submission. The amended boundary generally follows a straight and logical alignment to incorporate the area shown in blue.	Any consequential amendments be made to the planning maps and associated provisions necessary to give effect to the relief sought. The relief sought is site-specific, affects only a small additional area, and does not alter the strategic intent of Plan Change 81. Rather, it refines the notified zoning boundary to provide a more practical and efficient development outcome while maintaining the environmental safeguards relied upon by Council in preparing the plan change and make the most efficient use of the available reduced area in T-181.	The submitters support the proposed rezoning of part of Lot 8 DP 12705 from Rural 2 to Rural Residential under Plan Change 81. However, the submitters oppose the location of the notified southern and eastern Rural Residential zone boundaries. The submitters seek that these boundaries be amended to follow a more logical and practical alignment, as shown in Appendix 1 of this submission (see submission for more information). The submitters also seek a reduction in the minimum net area requirement for subdivision in Table 16.3C as supported by the Rounce Wastewater Assessment in Appendix 6 of the Section 32 report. The submitters seek that the Controlled Standard for subdivision be 4,000m^2. Yield plan based on notified zone setbacks and min lot areas:

					 Yield based on relief sought for zone boundary and minimum lot areas.

					
OS131.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones > 16.3.8.1 Controlled Subdivision (Rural Residential Zone)	Amend	Amendment of Figure 16.3C to include area T-181a having a minimum nett area of 4,000m2.	Such further or alternative relief as may be necessary to achieve the intent of this submission. The relief sought is site-specific and Appendix 3 shows how the relief sought complies with the FDS G5 typology, which seeks an average lot size of 5,000m² whilst being able to comply with boundary, zone, powerline and wetland setbacks and	The submitters also seek a reduction in the minimum net area requirement for subdivision in Table 16.3C as supported by the Rounce Wastewater Assessment in Appendix 6 of the Section 32 report. The submitters seek that the Controlled Standard for subdivision be 4,000m^2. The requested amendment would provide a more efficient land use outcome, improve future subdivision design and rural land management, maintain environmental protections including wetland setbacks, and better achieve the purpose and intent of Plan Change 81 without resulting in additional adverse environmental effects. see original submission for more details and maps below:

				makes the most efficient use of the available reduced area in T-181.	Yield plan based on notified zone setbacks and min lot areas:  Yield based on relief sought for zone boundary and minimum lot areas.

John Lister

Submitter 132

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS132.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Do not apply MDRZ or intensification provisions to Mapua. Retain Mapua's village character. Focus development in areas with existing infrastructure and services.	The submitter considers intensification incompatible with Mapua's identity, unsupported by community sentiment, and better located in already serviced urban centres.	The submitter opposes PC81, stating that multi-storey and intensive residential development is inappropriate for Mapua's village character. They note that multi-storey housing does not meet the visual or practical needs of the community and is not supported by residents they have spoken to. They consider recent developments to have added little to the community and argue that limited local employment means intensified housing will increase travel distances and living costs. They believe sufficient land is already being developed elsewhere and that growth should occur closer to serviced centres like Motueka and Richmond.

Lyndle Lister

Submitter 133

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS133.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Do not apply MDRZ or intensification provisions to Mapua. Retain Mapua's village character and provide housing types that reflect community needs.	The submitter considers intensification incompatible with Mapua's identity, harmful to amenity, and contrary to long-expressed community preferences.	The submitter opposes PC81, stating that Mapua is a village and should not be treated as a suburb of Richmond or Nelson. They oppose two-storey townhouses, stating they are not in keeping with Mapua's character and do not meet local housing needs - particularly for older residents who require single-level homes. Urbanising Mapua will destroy its special character and appeal to residents and visitors.

Chris and Dawn Campbell

Submitter 134

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS134.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Delete PC81 entirely, or at minimum remove Mapua from MDRZ and intensification provisions.	The submitters consider intensification incompatible with Mapua's village identity, unsafe for local roads, unsupported by infrastructure, and better located in already serviced urban centres.	Oppose PC81 as Mapua is a coastal village, not an urban centre. Existing density already meets local needs and that further intensification will worsen congestion, particularly on Higgs Road and Aranui Road, which they consider unsafe and already constrained. They note limited local employment means residents must travel to Nelson or Motueka, increasing traffic and environmental impacts. Multi-storey housing is unsuitable for older people and unlikely to appeal to first-home buyers due to distance from services, schools, and public transport. Nelson and Richmond more appropriate locations for medium-density housing.

Champion Family Trust

Submitter 135

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS135.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 48 - Proposed PC81 - Zone - Richmond, Champion Rd	Support	Retain MDRZ rezoning for 46 and 48 Champion Road.	The submitter considers the location highly suitable for higher-density housing due to excellent access to services, transport, and established infrastructure, and consistent with national policy direction.	The submitter supports rezoning their land to Medium Density Residential Zone. They state the properties are ideally located close to Richmond CBD, Saxton Field, supermarkets, schools, recreation facilities, public transport, and cycling infrastructure. They consider the area well-serviced and appropriate for intensification, consistent with the NPS-UD and efficient use of existing urban infrastructure.
OS135.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 48 - Proposed PC81 - Zone - Richmond, Champion Rd	Amend	Reconsider the noise overlay provisions so they do not restrict MDRZ development capacity.	The submitter considers the overlay inconsistent, unjustified, and likely to impose unnecessary constraints on future housing development.	The submitter is concerned by the Road Traffic Noise Overlay applied to their properties. They are concerned it will impose additional acoustic or design constraints that reduce development potential and undermine the MDRZ rezoning.

Kathryn (Kate) Hanna

Submitter 136

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS136.1	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Support	Maintain the position of the indicative Reserve running from White Road through to the Richmond South greenway on the Deferred Mixed Business Zoned land adjacent to the Submitters boundary.	Given this proposed Zoning and the range of future activities that will be permitted on this adjoining land, it is important that there is a buffer between the future Mixed Business Zone activities and the Submitters land to ensure that cross boundary effects do not arise. The indicative reserve will provide an appropriate buffer.	Supports the strip of indicative reserve to buffer submitter's property adjoining the Deferred Mixed Business Zone

Wakefield Village Development Ltd Mark Lile

Submitter 137

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS137.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 61 - Proposed PC81 - Zone - Wakefield Central	Oppose	Remove the proposed Medium Density Residential Zone 113 Edward Street and that portion involving 177 Edward Street.	This opposition is due to WVDL having already advanced its design for a residential subdivision of this site. Refer to original submission for more information	PC81 proposes to create a new Medium Density Residential Zone over that area described as T-30 and owned by the submitter - 113 Edward Street and 177 Edward Street.
OS137.2	Proposed Plan Change No. 81 > Maps > Area Maps > 27 - Proposed PC81 - Area - Wakefield Central	Amend	Change Area Map 80-24 Wakefield to extend the Open Space corridor over the Pitfure Stream through to Higgins Road. Refer to original submission for more information	Change Area Map 80-24 Wakefield to extend the Open Space corridor over the Pitfure Stream through to Higgins Road.	Change Area Map 80-27 Wakefield to extend the Open Space corridor over the Pitfure Stream through to Higgins Road.

				Refer to original submission for more information.	
OS137.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	• Add a stormwater deferment to T-194b and other areas in Wakefield in need of stormwater upgrades. • Make amendment to the stormwater and water deferments to ensure these align with the most up to date discussions, with appropriate flexibility to cater for other solutions that may be identified as equally appropriate. • Make corrections and amendments to the listed transport constraints in Appendix 1 of Schedule 17.14A to remove the Higgins Road requirement from WK21.	Area Map 80-63 proposes deferment provisions that apply to T-194b and WK21 which are inconsistent. Refer to original submission for more information.	Schedule 17.14A Area Map 80-63 proposes deferment provisions that apply to T-194b and WK21 which are inconsistent.

Ministry of Education

Submitter 138

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS138.1	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words	Support	Include as follows: <u>Educational facility</u> <u>means land or buildings used for teaching or training by child care services, schools, or tertiary education services, including any ancillary activities.</u>	The Ministry requests that the Council adopt a new definition for 'educational facility' which is a defined term in the National Planning Standards.	Submitter wishes to include definition of educational facility
OS138.2	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > H	Oppose	Amend as follows: <u>means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, office or other room specified in the Plan to be a similarly occupied room.</u>	The Ministry requests that the definition of habitable room is made consistent with the National Planning Standards. The inclusion of teaching spaces within the National Planning Standards 'habitable room' definition accounts for educational facilities.	Opposes proposed definition of habitable room
OS138.3	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > N	Amend	Amend as follows: Net density – means the number of lots or household units per hectare (whichever is the greater). The area (ha) includes land for: • Residential purposes including all on-site open space and parking associated with residential development; • Local roads and roading corridors, including pedestrian and cycle ways, but excluding State Highways and major arterial roads; • Local (recreation, local purpose) reserves	The Ministry acknowledges the inclusion of the definition of 'Net Density'. However, request that the change in wording from 'schools' to 'educational facilities' to align with the definitions of the plan.	Amend the proposed definition for net density

			The area (ha) excludes land that is: • Stormwater retention and treatment areas • Constrained by natural hazards (e.g. earthquake, slope instability, ground subsidence, inundation) • Set aside to protect ecological, cultural, historic heritage, natural character or landscape values; • For community or commercial activities, or for ~~schools~~ educational, hospitals or other District, Regional or subregional facilities.		
OS138.4	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.4 Residential Activities and Community Facilities > 5.4.2 Objective	Amend	Amend as follows: Accommodation of a wide range of ~~residential activities and~~ accessible community and educational facilities in urban areas.	The Ministry acknowledge the amendments made by the Council to remove 'residential activities from Chapter 5.4 of the Plan and requests that specific regard is given to 'educational facilities' as these are generally located within urban areas.	Amend 5.4.2 to include educational facilities
OS138.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.4 Residential Activities and Community Facilities > 5.4.3 Policies	Support	Retain as proposed	The Ministry support the amendments made by the Council to replace 'residential' with 'urban' areas. As mentioned in 5.4.3.1 educational facilities are located within urban areas and this is explicitly acknowledged.	Supports proposed wording for 5.4.3.1
OS138.6	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.4 Residential Activities and Community Facilities > 5.4.20 Methods of Implementation	Amend	Amend as follows: Rules which permit community activities and educational facilities are subject to meeting performance standards.	The Ministry acknowledge 5.4.20.1(a) which relates to the regulatory methods of implementation under Chapter 5.4. However, the Ministry requests that specific regard is given to 'educational facilities'.	Amend rules which permit community activities subject to meeting performance standards.
OS138.7	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.4 Residential Activities and Community Facilities > 5.4.30 Principal Reasons and Explanation	Amend	Amend as follows: Community facilities such as halls, educational facilities ~~schools~~, health care facilities or hospitals may be of local or regional importance. They must be readily accessible to the ~~residential~~ community which they serve if they are to contribute effectively to the overall amenity or well-being of the community. However, because they have the potential to create adverse effects such as noise, traffic and long hours of operation, a high standard of amenity will be sought.	The Ministry acknowledges the amendment made by Council to 5.4.30 principal reasons and explanations. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend schools to educational facilities
OS138.8	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.3 Policies	Support	Retain as proposed	The Ministry supports policy 10A.3.6, which includes educational facilities such as kura kaupapa.	Supports inclusion of 10A.3.6
OS138.9	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic)	Oppose	Delete cycle parking table	The Ministry does not support the requirements for minimum numbers of long stay cycle parking within educational facilities. There is no requirement under the National Policy Statement for Urban Development to include provisions in relation to cycle parking, as such it is recommended the need for long stay cycle parking within educational facilities be removed.	Opposes minimum numbers of long stay cycle parking within educational facilities

OS138.10	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.1 Issues	Amend	Amend as follows: Improved connectivity between the residential area and the ~~school~~ educational facilities.	The Ministry acknowledges Issue 6.16.1.5 which relates to connectivity between the residential area and the school. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Improved connectivity between the residential area and the school.
OS138.11	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Amend	Amend as follows: To facilitate additional access from the residential area to ~~the Brightwater school~~ educational facilities.	The Ministry acknowledge policy 6.16.3.6 which relates to access to Brightwater School. However, the Ministry request an amendment to the specific mention of 'Brightwater School' to 'educational facilities' as names can change over time.	Amend To facilitate additional access from the residential area to the Brightwater school.
OS138.12	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Amend	Amend as follows: Controlled Subdivision (Residential Zone — Standard Density Development) A resource consent is required. The Council has reserved control over the following matters: Traffic (3) The provision, design and routes of cycleways, walkways and bridle paths, including linkages between any site and local retail areas, ~~schools~~ educational facilities, reserves, bus routes and arterial roads.	The Ministry acknowledges the controlled activity standard for Traffic under 16.3.3.1(3) However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amendments to Controlled Subdivision
OS138.13	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	Amend as follows: Outline Spatial Plan The provision, design and routes of cycleways, walkways and bridle paths, including linkages between any site and local retail areas, ~~schools~~ educational facilities, reserves, bus routes/stops and arterial roads.	The Ministry acknowledges 16.3.3A.2(6) which relates to Outline Spatial Plans. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend Controlled Subdivision – Medium Density Residential Zone – Vacant Allotment in Outline Spatial Plan area by replacing 'schools' with 'educational facilities'.
OS138.14	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	Amend as follows: Traffic (streets, access, parking, manoeuvring, loading) The provision, design and routes of cycleways, walkways and bridle paths, including linkages between any site and local retail areas, ~~schools~~ educational facilities, reserves, bus routes and arterial roads.	The Ministry acknowledges 16.3.3A.2(29) which relates to Traffic. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend Controlled subdivision MDRX - vacant allotment. Replace 'schools' with 'educational facilities'.
OS138.15	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.4 Business and Industrial Zones > 16.3.4.1 Controlled Subdivision (Business and Industrial Zones)	Amend	Amend as follows: A resource consent is required. The Council has reserved control over the following matters:	The Ministry acknowledges 16.3.4.1(3) which relates to the Business and Industrial Zones. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend controlled subdivision in business and industrial zones

			(3) The provision, design and routes of cycleways, walkways and bridle paths, including linkages between any site and local retail areas, ~~schools~~ educational facilities, reserves, bus routes and arterial roads.		
OS138.16	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones > 16.3.8.1 Controlled Subdivision (Rural Residential Zone)	Amend	Amend as follows: Existing Buildings and Trees Where a new allotment contains an existing shelter or spray belt, horticultural plantings or plantation forest, the boundaries of the allotment are drawn relative to these trees so that the shelter or spray belt, horticultural plantings or plantation forest complies as a permitted activity with all applicable zone rules relating to height and setbacks from boundaries, roads, dwellings, ~~schools~~ educational facilities and early childhood education facilities.	The Ministry acknowledges 16.3.8.1(d) which relates to the existing buildings and trees. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend schools to educational facilities
OS138.17	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones > 16.3.8.1 Controlled Subdivision (Rural Residential Zone)	Amend	Amend as follows: A resource consent is required. The Council has reserved control over the following matters: (4) The provision, design and routes of cycleways, walkways and bridle paths, including linkages between any site and local retail areas, ~~schools~~ educational facilities, reserves, bus routes and arterial roads.	The Ministry acknowledges 16.3.8.1(4) which relates to design and routes of cycleways, walkways and bridle-paths which council has reserved control over. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend schools to educational facilities
OS138.18	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.20 Principal Reasons for Rules	Support	Retain as proposed	The Ministry is supportive the of the inclusion of the Medium Density Residential Zone (MDRZ) to the principal reasons for rules under Section 16.3.20. The inclusion of MDRZ aligns with the National Policy Statement for Urban Development (NPS-UD).	Supports explanatory text
OS138.19	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.20 Principal Reasons for Rules	Support	Retain as proposed	The Ministry support that site access to Stafford Drive is limited between Seaton Valley Stream and Warren Place because of its proximity to the shared path leading to Māpua School. The provision supports the Ministry in maintaining the safety of students, parents and staff of Māpua School.	Supports explanatory text
OS138.20	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones > 16.3.8.1 Controlled Subdivision (Rural Residential Zone)	Amend	Amend as follows: Existing Buildings and Trees Where a new allotment contains an existing shelter or spray belt, horticultural plantings or plantation forest, the boundaries of the allotment are drawn relative to these trees so that the shelter or spray belt, horticultural plantings or plantation forest complies as a permitted activity with all applicable zone rules relating to height and setbacks from boundaries, roads, dwellings, ~~schools~~	The Ministry acknowledges 16.3.8.1(d) which relates to the existing buildings and trees. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend schools to educational facilities

			educational facilities and early childhood education facilities.		
OS138.21	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Amend as follows: Transport, Access and Roads The provision, design and routes of cycleways, walkways and bridle paths, including linkages between any site and local retail areas, ~~schools~~ educational facilities, reserves, bus routes and arterial roads.	The Ministry acknowledges 16.3A.43 which relates to the transport, access and roads. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend school to educational facility
OS138.22	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Support	Retain as proposed	The Ministry supports that educational facilities are considered as community areas under Schedule 16.3D.	Supports OSP
OS138.23	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.1: Outline Spatial Plan - 120 Wensley Road	Amend	Amend as follows: Outline Spatial Plan - 120 Wensley Road Context This Outline Spatial Plan covers 2.6 hectares of flat land with frontage to Wensley Road and Otia Drive, and a connection to Campari Drive. The site is surrounded by established residential areas and is close to ~~schools~~ educational facilities, reserves, and community facilities. Its location within Richmond's urban area provides strong transport links via Wensley Road. A thin strip of land in separate ownership lies along the northeast boundary of the site. The site is a strategic opportunity to improve neighbourhood connectivity and support consolidated residential growth in a well-serviced area.	The Ministry acknowledges the inclusion of Outline Spatial Plan - 120 Wensley Road in Schedule 16.3D.1. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend Schools to educational facilities
OS138.24	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.2: Outline Spatial Plan - 123 Salisbury Road	Amend	Amend as follows: Outline Spatial Plan – 123 Salisbury Road Context This Outline Spatial Plan covers 6.2 hectares between Arbor-Lea Avenue and Champion Road, framed by the Richmond Deviation and Salisbury Road. The site sits within a well-established residential area, with direct connections to the arterial road network and the wider Richmond urban area. The area includes the Richmond Aquatic Centre and Richmond Baptist Church, and is close to ~~schools~~ educational facilities, retail centres, and public transport on Salisbury Road.	The Ministry acknowledges the inclusion of Outline Spatial Plan - 123 Salisbury Road in Schedule 16.3D.2. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country	Amend schools to educational facilities

OS138.25	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.7: Outline Spatial Plan - Wakefield Central	Support	Retain as proposed	The Ministry supports the inclusion of Outline Spatial Plan – Wakefield Central in Schedule 16.3D.7, noting that this is in proximity to Wakefield School.	Supports in full
OS138.26	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.11: Outline Spatial Plan - Motueka	Amend	Amend as follows: Outline Spatial Plan – Motueka Context This Outline Spatial Plan covers 8.89 hectares of land located to the west of High Street (State Highway 60). It extends north to the residential areas of Whakarewa Street and Coppins Place and adjoins horticultural land to the south and west. The site represents a strategic opportunity for coordinated residential development near Motueka's town centre, enabling new homes and amenities within walking distance of shops, ~~schools~~ educational and community facilities.	The Ministry acknowledges the inclusion of Outline Spatial Plan - Motueka in Schedule 16.3D.11. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend schools to educational facilities
OS138.27	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.2 Land Use > 17.1A.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Permitted Activities (Land Use – General) Particular Activities The activity is not one of the following: (i) an activity that emits odour causing a nuisance beyond the site boundary; (ii) intensive livestock farming or commercial boarding or breeding of animals; (iii) an industrial or commercial activity, except: as allowed as a home occupation; or as provided for in rule 16.6.2.1(o); (iv) a landing area or pad for helicopters (other than for medical or fire fighting purposes), an aircraft landing strip, aerodrome or airport; (v) a papakāinga development (See Section 16.14); (vi) a community activity, where the total vehicle movements in combination with any other permitted activity on the site exceed 30 per day on any one day. Except where provided as an educational facility under 17.1A.2.1(p);	The Ministry acknowledge Rule 17.1A.2.1(a) which relates to the permitted land use activities in the Medium Density Residential Zone. It is acknowledged that the educational facilities fall under the community activity definition. However, an amendment has been recommended to clarify in this instance community activities do not include educational facilities, as this is proposed to be covered by a new rule.	Clarification provided for community facilities in (vi)

OS138.28	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.2 Land Use > 17.1A.2.1 Permitted Activities (Land Use - General)	Support	Retain as proposed	The Ministry support the hours of operation as per 17.1A.2.1(b). The general hours of operation for educational facilities, when the site is open to visitors, students, clients, and deliveries is typically between the hours of 7:00am — 7:00pm Monday to Friday.	Supports hours of operation in 17.1A.2.1(b)
OS138.29	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.2 Land Use > 17.1A.2.1 Permitted Activities (Land Use - General)	Support	Retain as proposed	The Ministry supports the noise restrictions as set out in 17.1A.2.1(n). The Ministry have mandatory requirements for acoustics in the Designing Quality Learning Spaces (DQLS), the majority of which meet the restrictions in 17.1A.2.1(n).	Supports noise table
OS138.30	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.2 Land Use > 17.1A.2.1 Permitted Activities (Land Use - General)	Amend	Add as follows: Permitted Activities (Land Use – General) Educational Facility (i) an educational facility, where the total vehicle movements in combination with any other permitted activity on the site exceed 30 per day on any one day.	The Ministry supports the inclusion of the Medium Density Residential Zone within the TRMP in principle. The Ministry request the inclusion of an additional permitted activity that is specifically enables the provision of educational facilities within the Medium Density Residential Zone to support the educational needs of the community	Proposed a new provision for educational facilities in MDRZ Land Use rules
OS138.31	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.2 Land Use > 17.1A.2.5 Discretionary Activities (Land Use - General)	Amend	Add as follows: Restricted Discretionary Activities (Educational Facility) Where compliance is not achieved with the permitted standards in Rule 17.1A.2.1(p). Matters of discretion are restricted to: 1. the location of landscaping; and 2. any adverse effects on the streetscape; and 3. The scale of any building, structures and car parking compared to existing permitted development. 4. Adverse effects of the activity in terms of traffic and parking congestion on site and safety and efficiency of roads giving access to the site. 5. The duration of the consent and the timing of reviews of conditions. Notification: Any application made under this rule is precluded from being publicly notified. Activity status when compliance is not achieved: Discretionary Where compliance is not achieved as a permitted or restricted discretionary activity.	The Ministry supports the inclusion of the Medium Density Residential Zone within the TRMP. The Ministry request the inclusion of an additional restricted discretionary activity that is specifically enables the provision of educational facilities within the Medium Density Residential Zone to support the educational needs of the community.	Proposes new provision inclusion for educational facilities as a RD activity

OS138.32	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.2 Land Use > 17.5.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Permitted Activities (Land Use - General) The activity is not: (i) an industrial or rural industrial activity; (ii) quarrying, where the volume of land disturbed is greater than 50 cubic metres in any 12-month period; Advice Note: Clause (a)(ii) does not apply to forestry quarrying which is managed by NES-PF regulations 51 - 59. (iii) a constructed or marked out landing area or pad for helicopters, an aircraft landing strip, aerodrome or airport; (iv) the sale of liquor; (v) a rural selling place where: the sale and display area is greater than 25 square metres; or access is to an arterial route; (vi) a commercial activity; (vii) a community activity, except on Part Section 217 Waimea East District (Lower Queen Street, Richmond, occupied by Nelson Marlborough Institute of Technology), where the permitted activity is education, training and research; <u>(viii) educational facility</u>	The Ministry supports Rule 17.5.2.1(a) which relates to the permitted land use activities in the Rural 1 Zone. It is acknowledged that the educational facilities fall under the community activity definition however as discussed earlier the Ministry seek a separate definition for 'educational facilities' which is consistent with the National Planning Standards. As such, specific inclusion is sought for 'educational facilities' in the Rural zone.	Include educational facility as point (viii)
OS138.33	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.2 Land Use > 17.5.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Intensive Livestock Farming Intensive livestock farming which is intensive pig farming, including the keeping of pigs or the disposal of piggery effluent, must achieve the following setbacks: (i) Distance from a Residential Zone or Medium Density Residential Zone boundary existing at the date of the establishment of the pig farming activity - 2,000 metres. (ii) Distance from a Rural Residential Zone or Pāpakainga Zone boundary, ~~school~~ <u>educational facility</u>, church, public hall, marae, recreation ground, or other area with frequent public use existing at the date of the establishment of the pig farming activity - 1,500 metres.	The Ministry acknowledges the permitted activity for intensive livestock farming. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility

OS138.34	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.2 Land Use	Support	Retain as proposed	The Ministry acknowledge Rule 17.5.2.4, noting that educational facilities do not meet condition 1 of Rule 17.5.2.1	Supports 17.5.2.4
OS138.35	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.3 Building Construction, Alteration, or Use > 17.5.3.3 Restricted Discretionary Activities (Building Construction, Alteration, or Use)	Amend	Amend as follows: General If an adjoining property has horticultural plantings, including vineyards, where pesticides may be discharged to air, any ~~school~~ educational facility and its grounds, early childhood education facility and its grounds, visitor accommodation or tourist accommodation is set back at least: (i) 30 metres from the boundary common to the horticultural plantings, including vineyards, and the building or grounds; or (ii) 20 metres from horticultural plantings, including vineyards, where a spray belt is established along the boundary common to the horticultural plantings and the building or grounds.	The Ministry acknowledges the general restricted discretionary activity rules set out under 17.5.3.3(d). However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility
OS138.36	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.5 Rural 1 Zone Rules > 17.5.4 Plantation Forests, Horticultural Plantings, and Spray and Shelter Belts > 17.5.4.1 Permitted Activities (Plantation Forests, Horticultural Plantings, Spray Belts and Shelter Belts)	Amend	Amend as follows: Horticultural Plantings Setbacks Horticultural plantings where pesticides may be discharged to air are set back at least: (i) 30 metres from any dwelling, any other building used for any residential activity, visitor accommodation or tourist accommodation, or any school educational facility or ~~school~~ educational facility ~~grounds, or early childhood education facility~~ or its grounds on an adjoining property; or (ii) 20 metres from any of the buildings or grounds specified in (i) of this condition where a spray belt is established along the boundary common to the horticultural plantings and the buildings or grounds.	The Ministry acknowledges the restricted discretionary activity for Horticultural Plantings Setbacks. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to education facility
OS138.37	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.6 Rural 2 Zone Rules > 17.6.2 Land Use > 17.6.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Activities (a) The activity is not: (i) (an industrial or rural industrial activity; (ii) quarrying, where the volume of land disturbed is greater than 50 cubic metres in any 12-month period; Advice Note: Clause (a)(ii) does not apply to forestry quarrying which is managed by NES-PF regulations 51-59.	The Ministry supports Rule 17.6.2.1(a) which relates to the permitted land use activities in the Rural 2 Zone. It is acknowledged that the educational facilities fall under the community activity definition however as discussed earlier the Ministry seek a separate definition for 'educational facilities' which is consistent with the National Planning Standards. As such, specific inclusion is sought for 'educational facilities' in the Rural zone.	Amend school to educational facility

			(iii) a constructed or marked out landing area or pad for helicopters, an aircraft landing strip, aerodrome or airport; (iv) the sale of liquor; (v) a rural selling place where: the sale and display area is greater than 25 square metres; or access is to an arterial route; (vi) a commercial or community activity; (vii) <u>educational facility</u> (viii) tourist accommodation; (ix) cooperative living; (x) a pāpakainga development <u>(See Section 16.14)</u>; (xi) a home occupation, except as allowed by rule 17.6.2.2. (xii) the maintenance, repair, storing, or parking of more than two heavy vehicles with a gross laden weight of 3,500 kilograms or more (except those heavy vehicles that are directly associated with plant and animal production or any temporary construction, maintenance or demolition work), that are being used for or in connection with any commercial, industrial, rural industrial or home occupation activity.		
OS138.38	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.6 Rural 2 Zone Rules > 17.6.2 Land Use > 17.6.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Intensive Livestock Farming Intensive livestock farming, which is intensive pig farming, including the keeping of pigs or the disposal of piggery effluent, must achieve the following setbacks: (i) Distance from a Residential Zone or Medium Density Residential Zone boundary existing at the date of the establishment of the pig farming activity – 2,000 metres. (ii) Distance from a Rural Residential or Pāpakainga zone boundary, ~~school~~ <u>educational facility</u>, church, public hall, marae, recreation ground, or other area with frequent public use existing at the date of the establishment of the pig farming activity – 1,500 metres. (iii) Distance from a dwelling on another site in a Rural 1, Rural 2 or	The Ministry acknowledges the permitted activity for intensive livestock farming. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility

			Rural 3 zone existing at the date of the establishment of the pig farming activity or in relation to Rural 3 Zone, distance from any building location area as approved on a survey plan of subdivision – 500 metres.		
OS138.39	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.6 Rural 2 Zone Rules > 17.6.2 Land Use	Support	Retain as proposed	The Ministry acknowledge Rule 17.6.2.4, noting that educational facilities do not meet condition 1 of Rule 17.6.2.1	Supports amenity plantings matter
OS138.40	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.6 Rural 2 Zone Rules > 17.6.3 Building Construction, Alteration, or Use > 17.6.3.4 Restricted Discretionary Activities (Building Construction, Alteration, or Use)	Amend	Amend as follows: General If an adjoining property has horticultural plantings, including vineyards, where pesticides may be discharged to air, any ~~school~~ educational facility ~~and its grounds,~~ early childhood education facility and its grounds, visitor accommodation or tourist accommodation is set back at least:	The Ministry acknowledges the general restricted discretionary activity rules set out under 17.6.3.4(d) However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility
OS138.41	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.6 Rural 2 Zone Rules > 17.6.4 Plantation Forests, Horticultural Plantings, and Spray and Shelter Belts > 17.6.4.1 Permitted Activities (Plantation Forests, Horticultural Plantings, Spray Belts and Shelter Belts)	Amend	Amend as follows: Horticultural Planting Setbacks Horticultural plantings where pesticides may be discharged to air are set back at least: (i) 30 metres from any dwelling, any other building used for any residential activity, visitor accommodation or tourist accommodation, or any ~~school~~ educational facility, or early childhood education facility or its grounds on an adjoining property; or (ii) 20 metres from any of the buildings or grounds specified in (i) above, where a spray belt is established along the boundary common to the horticultural plantings and the buildings or grounds.	The Ministry acknowledges the restricted discretionary activity for Horticultural Plantings Setbacks. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility
OS138.42	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.7 Rural 3 Zone Rules > 17.7.2 Land Use > 17.7.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Activities (b) The activity is not: (i) an industrial or rural industrial activity; (ii) quarrying, where the volume of land disturbed is greater than 50 cubic metres in any 12-month period; Advice Note: Clause (b)(ii) does not apply to forestry quarrying which is managed by NES-PF regulations 51- 59. (iii) a constructed or marked out landing area or pad for helicopters,	The Ministry supports Rule 17.7.2.1(b) which relates to the permitted land use activities in the Rural 3 Zone. It is acknowledged that the educational facilities fall under the community activity definition however as discussed earlier the Ministry seek a separate definition for 'educational facilities' which is consistent with the National Planning Standards. As such, specific inclusion is sought for 'educational facilities' in the Rural zone.	Include educational facility

			an aircraft landing strip, aerodrome or airport; (iv) the sale of liquor; (v) a rural selling place where: the sale and display area is greater than 25 square metres; or access is to an arterial route; (vi) a commercial or community activity; (vii) <u>educational facility</u> (viii) tourist accommodation; (ix) conversion and use of an existing building to a dwelling where the building does not comply with the setback conditions for dwellings in rules 17.7.3.1(f) and 17.7.3.2; (x) a pāpakainga development; <u>(see Section 16.14)</u>		
OS138.43	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.7 Rural 3 Zone Rules > 17.7.2 Land Use > 17.7.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Intensive Livestock Farming Intensive livestock farming which is intensive pig farming, including the keeping of pigs or the disposal of piggery effluent, must achieve the following setbacks: (i) Distance from a Residential Zone or Medium Density Residential Zone boundary existing at the date of the establishment of the pig farming activity – 2,000 metres. (ii) Distance from a Rural Residential or Papakāinga zone boundary, any ~~school~~ <u>educational facility</u>, church, public hall, marae, recreation ground, or other area with frequent public use existing at the date of the establishment of the pig farming activity – 1,500 metres. (iii) Distance from a dwelling on another site in a Rural 1, Rural 2 or Rural 3 zone existing at the date of the establishment of the pig farming activity, or in relation to Rural 3 Zone, distance from any building location area as approved on a survey plan of subdivision – 500 metres. (iv) Any poultry body part and poultry offal processing and composting activity for or in connection with intensive livestock farming which is poultry farming, is set back at least 170 metres from any boundary of the site.	The Ministry acknowledges the permitted activity for intensive livestock farming. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility

OS138.44	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.7 Rural 3 Zone Rules > 17.7.2 Land Use	Amend	Ādd as follows: Restricted Discretionary Activities (Educational Facility) An educational facility is a restricted discretionary activity. A resource consent is required. Consent may be refused or conditions imposed, only in respect of the following matters to which the Council has restricted its discretion: 1. Consistency with the Design Guide for the area. 2. Adequacy and appropriateness of servicing. 3. The ability to mitigate adverse noise and visual effects by screening of activities from adjoining roads and sites. 4. The scale of any building, structures and car parking compared to existing permitted development. 5. Adverse effects of the activity in terms of traffic and parking congestion on site and safety and efficiency of roads giving access to the site. 6. The duration of the consent and the timing of reviews of conditions.	The Ministry request the inclusion of an additional restricted discretionary activity that is specifically enables the provision of educational facilities within the Rural Zone to support the educational needs of the rural community.	Addition of a new provision for educational facilities as a RD activity
OS138.45	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.7 Rural 3 Zone Rules > 17.7.3 Building Construction, Alteration, or Use > 17.7.3.3 Restricted Discretionary Activities (Building Construction, Alteration, or Use)	Amend	Amend as follows: General If an adjoining property has horticultural plantings, including vineyards, where pesticides may be discharged to air, any ~~school~~ educational facility ~~and its grounds~~, early childhood education facility and its grounds, visitor accommodation or tourist accommodation is set back at least: (i) 30 metres from the boundary common to the horticultural plantings, including vineyards, and the building or grounds; or (ii) 20 metres from horticultural plantings, including vineyards, where a spray belt is established along the boundary common to the horticultural plantings and the building or grounds.	The Ministry acknowledges the general restricted discretionary activity rules set out under 17.7.3.3(d) However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility
OS138.46	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.7 Rural 3 Zone Rules > 17.7.4 Plantation Forests, Horticultural Plantings, Spray Belts and Shelter Belts > 17.7.4.1 Permitted Activities (Plantation Forests, Horticultural Plantings, Spray Belts and Shelter Belts)	Amend	Amend as follows: Horticultural plantings where pesticides may be discharged to air are set back at least: (i) 30 metres from any dwelling, any other building used for any residential activity, visitor accommodation or tourist	The Ministry acknowledges the restricted discretionary activity for Horticultural plantings spray belts and shelter belts. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility

			accommodation, or any ~~school~~ educational facility ~~or educational facility school grounds~~, or early childhood education facility or its grounds on an adjoining property; or (ii) 20 metres from any of the buildings or grounds specified in (i) above, where a spray belt is established along the boundary common to the horticultural plantings and the buildings or grounds.		
OS138.47	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules > 17.8.2 Land Use > 17.8.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: The activity is not one of the following: (viii) intensive livestock farming; (ix) an industrial, rural industrial, community or commercial activity, except as a home occupation allowed by rule 17.8.2.2; (x) educational facility (xi) a rural selling place where: the sale and display area is greater than 25 square metres; or access is to an arterial route;	The Ministry supports Rule 17.8.2.1(a) which relates to the permitted land use activities in the Rural Residential Zone. It is acknowledged that the educational facilities fall under the community activity definition however as discussed earlier the Ministry seek a separate definition for 'educational facilities' which is consistent with the National Planning Standards. As such, specific inclusion is sought for 'educational facilities' in the Rural Residential zone.	Amend school to educational facility
OS138.48	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules > 17.8.2 Land Use > 17.8.2.1 Permitted Activities (Land Use - General)	Amend	Amend as follows: Tree Setbacks and Height Horticultural plantings where pesticides may be discharged to air are set back at least: (i) 30 metres from any dwelling, any other building used for any residential activity, visitor accommodation or tourist accommodation, or any school educational facility or educational facility school grounds, or early childhood education facility or its grounds on an adjoining property; or (ii) 20 metres from any of the buildings or grounds specified in condition (e)(i), where a spray belt is established along the boundary common to the horticultural plantings and the buildings or grounds.	The Ministry acknowledges the permitted activity rules set out under 17.8.2.1(e). However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility
OS138.49	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules > 17.8.2 Land Use	Amend	Amens as follows: Restricted Discretionary Activities (Educational Facility) An educational facility is a restricted discretionary activity. A resource consent is required. Consent may be refused or conditions imposed, only in respect of the following matters to which	The Ministry request the inclusion of an additional restricted discretionary activity that is specifically enables the provision of educational facilities within the Rural Residential Zone to support the educational needs of the rural community.	Amend to add in context

			the Council has restricted its discretion: (1) The ability to mitigate adverse noise and visual effects by screening of activities from adjoining roads and sites. (2) The scale of any building, structures and car parking compared to existing permitted development. (3) Adverse effects of the activity in terms of traffic and parking congestion on site and safety and efficiency of roads giving access to the site. (4) The duration of the consent and the timing of reviews of conditions.		
OS138.50	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules > 17.8.3 Building Construction, Alteration, or Use > 17.8.3.2 Restricted Discretionary Activities (Building Construction, Alteration, or Use)	Amend	Amend as follows: General If an adjoining property has horticultural plantings, including vineyards, where pesticides may be discharged to air, any ~~school~~ educational facility ~~and its grounds~~, early childhood education facility and its grounds, visitor accommodation or tourist accommodation is set back at least: (i) 30 metres from the boundary common to the horticultural plantings, including vineyards, and the building or grounds; or (ii) 20 metres from horticultural plantings, including vineyards, where a spray belt is established along the boundary common to the horticultural plantings and the building or grounds.	The Ministry acknowledges the general restricted discretionary activity for horticultural plantings. However, the Ministry request that the mention of 'schools' is updated to align with the definition of 'educational facilities' as this is the Ministry's standardised approach across the country.	Amend school to educational facility
OS138.51	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.13 Papakainga Zone Rules > 17.13.2 Land Use > 17.13.2.1 Permitted Activities (Land Use)	Support	Retain as proposed.	The Ministry support the removal of provision 17.13.2.1(d), as this provision would have included educational facilities such as kura kaupapa.	Supports the removal of 17.13.2.1(d)

Seamus and Sarah Van Lent

Submitter 139

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS139.1	Proposed Plan Change No. 81 > Maps > Area Maps > 03 - Proposed PC81 - Area - Mapua, Aranui Rd	Oppose	Delay any decision affecting the paper road adjoining the submitter's property until a comprehensive structure plan has been prepared and publicly consulted on. Meet directly with affected neighbouring landowners before making final decisions affecting this area. Reconsider the long-term planning approach for Mapua so that growth occurs at a pace that protects the village's unique character and quality of life.	The maps show the deletion of an indicative road and walkway adjoining the driveway that runs the length of the submitter's property, yet there is no corresponding concept plan showing: how future development will be accessed; where roads and driveways will be located; where housing is expected to be built; how many dwellings are anticipated; how traffic will operate; how parking will be accommodated; or how stormwater and other infrastructure will be provided. Without this information, neighbouring property owners cannot reasonably assess the impacts on privacy, traffic, safety, outlook, noise or amenity. Submitter requests for enough information for the public to make informed submissions on how it effects their property. In its current form, Plan Change 81 does not achieve this.	Oppose in Part Believe Mapua has already contributed towards the district's housing needs. Plan Change 81 proposes further growth that risks fundamentally changing the identity of Mapua from a rural village into another urban township. Once the remaining open spaces are lost, they cannot be replaced. See original submission for further information.
OS139.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 32 - Proposed PC81 - Zone - Mapua, Aranui Rd	Oppose	Decline or significantly reduce the extent of further residential intensification proposed for Mapua under Plan Change 81. Protect the remaining open rural character that defines Mapua as a village. Prepare an integrated development plan showing future roads, access arrangements, housing layouts, infrastructure and staging before further rezoning proceeds. Ensure infrastructure, employment land, commercial land and community facilities are planned alongside any future residential growth.	Before purchasing our property at 85 Aranui Road we met with a Tasman District Council planner specifically to discuss our options to extend our house and the paper road adjoining the driveway that runs the length of our land and what affects this might have for future plans. This paper road showed that it would eventually join Jessie Street with Aranui Road. Based on the information provided, we understood that if this land was ever rezoned and developed into residential land, then a legal road and any sections would have only a limited impact on our property with the zone change to residential (not Medium density). We relied on that information when making the significant decision to purchase our family home.	Oppose in part. Amend to residential zoning. Submitter is not opposed to sensible and well-planned development, yet believe Mapua has already accommodated substantial residential growth. Are concerned that Plan Change 81 proposes further significant expansion and intensification without adequately considering the cumulative effects on the character, infrastructure and liveability of the community. If significant intensifcation happens around the submitters property, then affected landowners deserve certainty to make informed decisions about their future / and or make it known that their property maybe included in this development! See original submission for further information.

			Meet directly with affected neighbouring landowners before making final decisions affecting this area. Reconsider the long-term planning approach for Mapua so that growth occurs at a pace that protects the village's unique character and quality of life.		

Seaview Heights

Submitter 140

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS140.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 38 - Proposed PC81 - Zone - Motueka Central	Oppose	Amend Plan Change 81 to provide additional housing capacity for Motueka over the short, medium and long term.	The submitter considers Motueka has an immediate and significant housing shortage and that Plan Change 81 does not provide sufficient development capacity to respond to forecast housing demand. The submitter considers there is a projected housing shortfall, that existing growth areas are constrained by natural hazards, servicing limitations and highly productive land, and that relying on housing surpluses elsewhere does not adequately address Motueka's local housing needs. The submitter also considers additional residential land is needed to support housing choice, population growth, local businesses and community facilities.	Oppose those parts of Plan Change 81 relating to Motueka because the submitter considers they do not provide sufficient housing capacity to meet Motueka's expected growth and housing needs over the next 10 years. The submitter considers Motueka faces a significant housing shortfall and that the development areas proposed through PC81 are insufficient to provide for future demand.
OS140.2	2-Out of Scope	Amend	Rezone the Seaview Heights properties from Rural 1 Zone to Rural 1 Deferred Residential, with the deferred zoning to be released following provision of wastewater treatment infrastructure and final Council design approval. Make any consequential amendments necessary to give effect to the rezoning.	The submitter considers Seaview Heights is a logical and deliverable growth location that can contribute to meeting Motueka's housing needs. The submitter considers the site is close to Motueka township, schools and community facilities, can provide significant additional housing supply, supports freehold housing opportunities, and can be serviced through proposed wastewater, water supply and stormwater solutions. The submitter considers the site avoids many of the natural hazard, flooding, coastal inundation and highly productive land constraints affecting other growth areas and can make a significant contribution to addressing Motueka's projected housing shortfall.	Seek rezoning of the Seaview Heights properties from Rural 1 Zone to Rural 1 Deferred Residential. The submitter considers Seaview Heights represents a suitable location to provide additional housing capacity for Motueka and is a more practical growth option than some of the areas proposed through Plan Change 81. The submitter considers the site can provide substantial additional housing while avoiding some of the natural hazard, servicing and productive land constraints affecting other growth areas.

				I think that is likely the cleanest and most defensible CONSULT treatment. Point 1 captures their opposition to the current Motueka growth strategy in PC81, while Point 2 captures the specific rezoning relief they seek as the solution.	

Inka Helwig

Submitter 141

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS141.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.13 Papakainga Zone Rules	Amend	Require the new development to have minimal street lighting and any lights to be no higher than 90 centimetres and directed downward only. Require houses within the development to have thick curtains to block light.	The submitter states that the Galeo area is in a dark sky area and considers this should be taken into account in the design of the proposed development. The submitter considers thick curtains would help reduce light effects associated with the development.	The submitter seeks lighting controls for the proposed development, including minimal street lighting, low-level lighting and downward-facing lights to protect dark sky values. The submitter seeks measures to reduce light escaping from houses within the proposed development.
OS141.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Amend	Do not provide a through road connection from the proposed development to Redmill Road. Provide access to the new housing development from State Highway 60, including via the beginning of Stringer Road, rather than through Redmill Road.	The submitter states that Redmill Road was never planned as a through road, Galeo residents contribute to upkeep of common areas including the entrance, and residents purchased in the estate because it is a lifestyle estate. The submitter states that construction vehicles and increased traffic would create noise and light pollution affecting Redmill Road and the wider Galeo Estate. The submitter considers the development could be easily accessed from State Highway 60 and that doing so would avoid impacts on existing residents.	The submitter opposes any proposed through road connection from the new development to Redmill Road. The submitter is concerned that a road connection and associated development traffic would increase traffic, noise and light effects within the estate. The submitter proposes that the new housing development be accessed from State Highway 60 rather than through Redmill Road.

NPHS Health NZ

Submitter 142

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS142.1	Proposed Plan Change No. 81	Support	Retain PC81's overall direction and incorporate NPHS recommendations to embed health, wellbeing, resilience, and equity in implementation.	The submitter considers PC81 well-aligned with healthy urban development principles, supporting diverse housing, compact growth, resilient infrastructure, and equitable access to services.	The submitter strongly supports PC81. They state the plan provides a solid foundation for future housing growth, medium-density development, papakāinga, and infrastructure-aligned expansion. They consider PC81 consistent with national policy and essential for improving housing supply, accessibility, and long-term community wellbeing.

OS142.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Amend	Incorporate NPHS recommendations to embed health, wellbeing, resilience, and equity in implementation.	The submitter considers PC81 well-aligned with healthy urban development principles, supporting diverse housing, compact growth, resilient infrastructure, and equitable access to services.	While NPHS support PC81, they suggest strengthening health-related provisions in areas such as universal design, walkability, transport choice, food access, noise management, open space, climate resilience, and community infrastructure.

Kathy and Grant O'Fee

Submitter 143

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS143.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 46 - Proposed PC81 - Zone - Richmond South	Oppose	The submitter wishes to register an objection to Plan Change 81 in the event that it affects their property at 315 Hill Street.	The submitter states they contacted Council on several occasions and visited Council offices but did not receive an answer to their question about whether the relevant section of Plan Change 81 affects their property. As submissions closed at 5pm, they considered they had no choice but to lodge an objection.	The submitter lodges an objection to Plan Change 81 because they have been unable to determine whether the proposed changes affect their property.

Lisa Lewis

Submitter 144

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS144.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd	Oppose	remove the Rototai land from the plan change	The submitter states there is no demonstrated demand for the proposed sections, raises concerns regarding flooding and increased stormwater runoff, sewerage and infrastructure capacity, traffic safety at the Rototai Road and Meihana Street intersection, pressure on services and facilities associated with population growth, parking pressures, and the loss of arable farmland.	The submitter opposes the proposed residential development and Medium Density Residential Zone at Rototai Road and seeks removal of the Rototai land from Plan Change 81.
OS144.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.10 TAkaka	Amend	Address parking requirements associated with additional population growth.	The submitter states that parking is already an issue in Tākaka and questions where additional car parks will be located.	The submitter raises concerns about parking capacity associated with increased population growth.
OS144.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 55 - Proposed PC81 - Zone - Takaka Central East	Amend	Provide commercial land and services needed to support future population growth.	The submitter questions where land will be available for a second supermarket and additional services.	The submitter questions whether sufficient commercial land is available to support future population growth.
OS144.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 58 - Proposed PC81 - Zone - Takaka, Puramahoi	Oppose	Do not allow residential housing development on the Puramahoi land near the airport.	The submitter considers airport activities create noise complaints and states that future airport growth is likely to increase complaints from nearby residential development.	The submitter opposes residential housing development at the Puramahoi land near the airport.

OS144.5	Proposed Plan Change No. 81 > Maps > Zone Maps > 56 - Proposed PC81 - Zone - Takaka, Park Ave	Support	Prioritise development in the Park Avenue area.	The submitter states the area does not have flood risk, requires additional stormwater management benefiting Motupipi Stream, and is close to town and the hospital.	The submitter supports future development occurring in the Park Avenue area.

PT (Booster Investments) Nominees Limited

Submitter 145

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS145.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.5 Land for Industrial Activities > 6.5.3 Policies	Support	Retain Policy 6.5.3.1A as notified.	The submitter considers the policy is consistent with the direction of the proposed Tasman Regional Policy Statement changes and the intent of Plan Change 81 to provide sufficient and appropriately located business land capacity to support long-term economic growth and employment needs.	Support Policy 6.5.3.1A, which provides for a supply of suitable land for regional and district industrial needs to at least 2054. The submitter supports the policy because it promotes the provision of sufficient and well-located industrial land to support economic growth, employment opportunities and future business development.
OS145.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	Retain the rezoning of 148 Main Road Hope to Light Industrial Zone but delete the deferred status applying to the land and apply the Light Industrial Zone immediately. Alternatively, if the deferred zoning is retained, retain the zoning framework as notified.	The submitter considers the site is well suited to industrial activities, reflects the established character of the wider Main Road Hope area, supports additional industrial land capacity and is consistent with the Future Development Strategy and National Policy Statement on Urban Development. The submitter considers deferred zoning is unnecessary, creates uncertainty and complexity for future development, and relies on a deferred zoning framework that remains uncertain due to ongoing appeals relating to Plan Change 79.	Support rezoning 148 Main Road Hope from Rural 1 Zone to Light Industrial Zone as part of the T-35A growth area, but oppose the application of deferred status to that zoning. The submitter considers the area is an appropriate location for industrial growth due to the existing mix of industrial, commercial, servicing and residential activities and seeks immediate operative industrial zoning rather than reliance on the deferred zoning framework.
OS145.3	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Oppose	Delete the Indicative Road from Area Map 80-24 as it relates to 148 Main Road Hope.	The submitter considers the proposed alignment significantly affects future development potential, reduces flexibility for alternative development layouts and lot configurations, and is premature given uncertainty regarding NZTA requirements and the future Hope Bypass alignment.	Oppose the inclusion and location of the Indicative Road shown on Area Map 80-24 through 148 Main Road Hope. The submitter considers the road alignment will unnecessarily constrain future development opportunities and site design.
OS145.4	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Oppose	Delete the Indicative Walkway from Area Map 80-24 as it relates to 148 Main Road Hope.	The submitter considers the location identified for the walkway may not be feasible and that flexibility is required to determine the most appropriate pedestrian connection as part of any future development proposal.	Oppose the location of the Indicative Walkway shown on Area Map 80-24 through 148 Main Road Hope and seek greater flexibility regarding any future pedestrian connection.
OS145.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Oppose	Delete T-35A from Schedule 17.14A. Alternatively, amend Schedule 17.14A so that the White Road/SH6 intersection upgrade is not required as a trigger for uplifting the deferred zoning applying to 148 Main Road Hope.	The submitter considers that if the wastewater and stormwater servicing requirements are met, there is no reason why development of the site should be delayed pending a White Road/SH6 intersection upgrade. The submitter considers the site does not rely on, or solely	Oppose inclusion of the submitter's land within Schedule 17.14A as a deferred site location and, if the deferred zoning remains, oppose the requirement for a White Road/SH6 intersection upgrade as a trigger for uplifting the deferred zoning.

				contribute pressure to, that intersection and should be able to proceed independently of that infrastructure trigger.	

Mark and Andrea Skatrud

Submitter 146

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS146.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	The proposed Change Plan 81 should be limited to one road connection Stringer Road	The submitters state that connecting Redmill Road to Stringer Road would increase traffic using Redmill Road and affect safety at the Redmill Road/Redvale Road intersection and the Redvale Road/Galeo Road intersection. They state Redmill Road was a dead-end road when properties were purchased and there was no plan for it to become a through road. They consider increased traffic may adversely affect property values and state that the proposed development could instead be accessed through Stringer Road without affecting the existing neighbourhood. The submitters state that they do not oppose Māori housing or Māori property development.	The submitters oppose the proposed connection of Redmill Road to Stringer Road and seek that access to the proposed development be provided only via Stringer Road.

Flathills 175 Ltd

Submitter 147

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS147.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 35 - Proposed PC81 - Zone - Mapua, Mapua Dr - Higgs Rd	Oppose	We OPPOSE the retention of the Rural 1 zoning of our land and SEEK a rezoning of our land (175 and 177 Māpua Drive, Māpua) from Rural 1 zone to allow for urban growth. This would be Mixed Business or Rural Residential zoning consistent with the established character of its surroundings for the balance of our land. A Mixed-Use zoning for the Māpua Drive frontage sufficient to accommodate local commercial and community services (including the superette and medical provider uses for which we have been approached)	The submitter states the site is centrally located within Māpua, is surrounded by urban development, has limited productive rural value, and that retaining the Rural 1 zoning is inconsistent with the surrounding environment and future growth of Māpua. The submitter also considers inundation and flood risks can be appropriately managed through engineering design, floor levels, stormwater management and subdivision design, and should not be a reason to retain the Rural 1 zoning.	Opposes the retention of the Rural 1 zoning applying to the site (175 and 177 Māpua Drive, Māpua) and seeks rezoning of the site from Rural 1 to enable urban development, including Mixed Business, Rural Residential and Mixed-Use zoning.
OS147.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.10: Outline Spatial Plan - Mapua Seaton Valley	Oppose	Include our land (175 and 177 Māpua Drive, Māpua) within the Māpua urban growth area and any applicable structure plan, providing for a rural residential and/or mixed-use development.	The submitter considers the site suitable for urban growth and development and states its inclusion would align with surrounding urban land use, existing infrastructure, and planned growth in Māpua.	Seeks inclusion of the site 175 and 177 Māpua Drive, Māpua within the Māpua urban growth area and any applicable structure plan.
OS147.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule	Amend	Provides for the walkway, open-space, reserve and Seaton Valley Stream ecological-buffer connections, and for integrated stormwater detention and wetland areas, to be	The submitter states these outcomes can be delivered through subdivision and development of the site (175 and 177 Māpua Drive, Māpua) and that the site has an	Seeks provision for walkway, open-space, reserve, ecological buffer, stormwater detention and wetland areas through

	16.3D: Outline Spatial Plans > Schedule 16.3D.10: Outline Spatial Plan - Mapua Seaton Valley		delivered through the subdivision and development of the rezoned land, rather than imposed as constraints on, or directed onto, otherwise undeveloped rural land.	important role in providing connections for the wider walkway, open-space and stormwater network. The submitter states the site plays an important role in the wider catchment and stormwater network and considers future development of the site could provide integrated stormwater detention, wetland areas, overland flow paths and other infrastructure. The submitter also states inundation risks can be managed through development design and stormwater measures.	development of the site at 175 and 177 Māpua Drive, Māpua.
OS147.4	Proposed Plan Change No. 81	Amend	Makes all consequential amendments to the objectives, policies, rules, planning maps and structure plans necessary to give effect to the above.	The submitter seeks consequential changes to ensure the rezoning, urban growth inclusion, and associated development outcomes are reflected throughout Plan Change 81.	Seeks amendments to plan provisions necessary to implement the requested rezoning and development outcomes related to 175 and 177 Māpua Drive, Māpua.

Parrish Grant Hurley

Submitter 148

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS148.1	Proposed Plan Change No. 81 > Maps > Area Maps > 11 - Proposed PC81 - Area - Motueka, McBrydie Rd	Amend	Remove the indicative road, reserve and walkway so that they do not run through T-213.	The indicative provisions run through the landowner's land, and he thinks they would be better placed elsewhere.	Support in part, however, opposes the location of the indicative road through his land on to Motueka highway, and thinks the reserve and walkway could be better placed.

Hope Horizon Limited

Submitter 149

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS149.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Support Delete Rural 1 Zone. Add Rural 1 deferred Mixed Business Zone.	This is because this section of Main Road Hope contains a mixture of non-soil-based production activities, and is also characterised by properties of such a size that would be highly unlikely to be used for that purpose again. This land is considered to be suitable for Mixed Business zoning, and will contribute positively toward the growing needs for commercial land in the region. The proposed Mixed Business zoning represents the sustainable management of this land resource. Hope Holdings Ltd are motivated to develop this site for Mixed Business purposes and has previously communicated this to the TDC. This support extends to the proposed Rural 1 deferred Mixed Business Zone to the north-east, being that other land also	Support Delete Rural 1 Zone. Add Rural 1 deferred Mixed Business Zone. See original submission for more information.

				contained within T-122a, as shown on that part of Map 80-53 provided below.	
OS149.2	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	Retain the Indicative Road as shown within 115 Main Road Hope.	This Indicative Road extends from the new intersection that straddles the boundary of the Hope Land Ltd and Haler titles, then extends generally south-west, parallel with Main Road Hope, before connecting with White Road to the south-west. The planned intersection with White Road is within the HHL (the submitters) property.	Oppose in part - indicative road for site T-122a. The position of the Indicative Road on the frontage of White Road is supported. see original submission for more information.
OS149.3	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	Delete Indicative Reserve along the south-eastern side of T-122a (on Map 81-24).	this 1Om Indicative Reserve amount to the loss of valuable land that could be available for development, but this would also trigger a 1Om setback of buildings from this indicative reserve in accordance with the existing operative Rule 17.3.3.l(ha). In combination, the impact is 20m wide along this entire boundary of this propsoed Mixed Business Zone. If the proposed Indicative Reserve is removed, then the setback from the Rural 1 zone is 1Om (Rule 17.3.3.l(d)). Consideration should also be given to this setback rule (Rule 17.3.3.l(d)) as a part of addressing the concerns raised in this submission.	Neither support nor oppose There is little explanation or justification for Indicative Reserve. It is unclear whether this is required as a walkway/cycleway linkage, as a buffer between the proposed Mixed Business land and the adjoining Rural I land, or as a part of infrastructure planning therefore the landowner cannot assess it any further. It is considered that this Indicative Reserve is not necessary for the sustainable management of natural and physical resources, nor required as a part of achieving the objective and policies of the national planning framework.
OS149.4	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Support	Retain changes to Objective 5.2.2 as proposed.	Consistent with the NPS-UD.	The proposed change to Objective 5.2.2 is considered to be appropriate, and will ensure that this objective is consistent with the NPS-UD.
OS149.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Provide for sufficient flexibility in policy 6.3.3.IC for sustainable management to be achieved in advance of deferments being uplifted.	The Overall Infrastructure Servicing Conclusion (Infrastructure Report, p42) also supports developer-led interim measures, and also the use of staging, thereby highlighting the importance of enabling interim solutions along with coordination between motivated developers and the LTP processes. This is again supported and consider this option needs to be clearly provided for in plan provisions. It is accepted that this matter overlaps directly with Plan Change 79, which is not a part of this formal process. Hope Holdings Limited is motivated to develop this· site for Mixed Business purposes and has gone as far as drawn plans and explored options of dealing with the servicing constraints without the downstream upgrades. There may be circumstances where development is able to proceed, before the uplifting of a deferment, without compromising the long-term objectives of the underlying zoning and without causing significant adverse effects on the environment. In addition, there may be significant time delays to fully service some areas or sites, which should not cause the wider area to remain in limbo if an appropriate standard of servicing can be achieved.	Oppose in part policy 6.3.3.1C In conjunction with Objective 6.3.2.3, this proposed new policy is an 'avoidance' policy that imposes a high hurdle for the development of deferred land until such time as all transport and servicing infrastructure is provided in accordance with the NTLDM.
OS149.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond > 6.8.3 Policies	Amend	Amend Policy 6.8.3.10 to ensure the planned extension of the urban boundary along Main Road	ensure the planned extension of the urban boundary along Main Road Hope is acknowledged as a part of urban growth.	Support in Part

			Hope is acknowledged as a part of urban growth.		This change to Policy 6.8.3.10 does not adequately address the proposed extension to the urban boundary by the provision for additional Light Industrial and Mixed Business land in Richmond South (Main Road Hope).
OS149.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond > 6.8.30 Principal Reasons and Explanation	Amend	Provide additional Explanation in 6.8.30 to acknowledge the additional Light Industrial and Mixed Business land in Richmond South	Acknowledge the additional Light Industrial and Mixed Business land in Richmond South	Support in part This change to Policy 6.8.30 does not adequately address the proposed extension to the urban boundary by the provision for additional Light Industrial and Mixed Business land in Richmond South (Main Road Hope).
OS149.8	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.4 Business and Industrial Zones > 16.3.4.1 Controlled Subdivision (Business and Industrial Zones)	Amend	Change the subheading to include Richmond South.	The subheading applies to Richmond South as well.	The subheading to this set of rules refers to Richmond West and Motueka, yet this change to rule (i) also relates to Main Road Hope (Richmond South).
OS149.9	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.20 Principal Reasons for Rules	Amend	Include updated principal reasons in 16.3.20.	No changes to the principal reasons in 16.3.20 are proposed to take account of the new Light Industrial and Mixed Business zones planned within Richmond South.	No changes to the principal reasons in 16.3.20 are proposed to take account of the new Light Industrial and Mixed Business zones planned within Richmond South.
OS149.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Include reference to 16.3D in criterion 4C.	This criterion should also include a reference to Schedule 16.3D.	Support in part This criterion should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are contained and so applied.
OS149.11	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision	Amend	Include reference to 16.3D in criterion 42.	This criterion should also include a reference to Schedule 16.3D	Schedule Support in part This criterion should also include a reference to Schedule 16.3D, being where the Outline Spatial Plans are contained and so applied.
OS149.12	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.14 Deferred Zone Rules	Amend	Retain the stated Transport constrain in so far as this relates to the south-western side of T-122a	Hope Holdings Ltd understands the importance of addressing this local transport constraint as a part of providing for the planned mixed business development at the south-western side of T-122a and T-35a (on the opposite side of Main Road Hope). The north-eastern side of T-122a is proposed to be provided the indicative road that intersections with main Road Hope, and so is able to be serviced from that end, without waiting for the White Road / Main Road Hope intersection upgrade.	Support in part Schedule 17.14A identifies that the Transport constraint of "Transport, White Road / SH6 Intersection upgrade" is required before the deferment is uplifted and the Mixed Business zone becomes available. The north-eastern side of T-122a is proposed with an indicative road that intersections with Main Road Hope, and so is able to be serviced from that end, without waiting for the White Road / Main Road Hope intersection upgrade.

Vicmatt Properties Ltd

Submitter 150

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS150.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.5 Land for Industrial Activities > 6.5.3 Policies	Support	Retain Policy 6.5.3.1A as notified.	The submitter considers the policy is consistent with the Future Development Strategy, National Policy Statement on Urban Development and the purpose of Plan Change 81 to provide sufficient industrial land capacity to support future business growth and employment opportunities.	Support Policy 6.5.3.1A, which provides for a supply of suitable land for regional and district industrial needs to at least 2054. The submitter supports the policy because it promotes the provision of sufficient and well-located industrial land to support economic growth and employment and is consistent with the direction of the proposed Regional Policy Statement changes and Plan Change 81.
OS150.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	Retain the rezoning of 128 and 130 Main Road Hope to Light Industrial Zone but remove the deferred status and apply the Light Industrial Zone immediately. Alternatively, if this relief is not granted, retain the zoning framework as notified.	The submitter considers the rezoning reflects the existing character and use of the area, provides additional industrial land capacity, supports economic wellbeing, and is consistent with the Future Development Strategy, National Policy Statement on Urban Development, Government Policy Statement on Housing and Urban Development and National Policy Statement for Highly Productive Land. The submitter also states that wastewater servicing upgrades have already been undertaken, there are no water supply constraints, stormwater solutions can be addressed on-site, and development of the site does not rely on the White Road/SH6 intersection upgrade. The submitter considers deferred zoning adds unnecessary uncertainty and complexity and is further affected by the unresolved appeal on Plan Change 79.	Support rezoning 128 and 130 Main Road Hope from Rural 1 Zone to Light Industrial Zone but oppose the deferred status applying to that zoning. The submitter considers the site already contains industrial and commercial activities, is identified in the Future Development Strategy as future business land, has access to strategic infrastructure, and should be zoned Light Industrial immediately rather than being subject to deferred zoning. The submitter considers existing and recent infrastructure upgrades mean the site is capable of supporting industrial development without the need for a deferred zoning approach.
OS150.3	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Oppose	Delete the Indicative Road from Area Map 80-24 as it relates to 128 and 130 Main Road Hope.	The submitter considers the proposed road alignment passes through the Network Tasman Hope power substation site, may be affected by Council stormwater upgrade works, conflicts with an existing access network developed in consultation with Council and NZTA, and could delay development by making site development dependent on development occurring on neighbouring properties. The submitter also considers it is premature to identify future state highway connections before the implications of the Hope Bypass are fully understood.	Oppose the inclusion and location of the Indicative Road shown on Area Map 80-24 through 128 and 130 Main Road Hope. The submitter considers the proposed road alignment affects future development opportunities and fails to adequately recognise existing access arrangements and infrastructure on the site.
OS150.4	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Oppose	Delete the Indicative Walkway from Area Map 80-24 as it relates to 128 Main Road Hope.	The submitter considers pedestrian and cycle access may be appropriate but requires further investigation and coordination with neighbouring landowners and NZTA. The submitter considers a workable alignment should be determined through future planning and development rather than imposed through the TRMP.	Oppose the location of the Indicative Walkway shown on Area Map 80-24 through 128 Main Road Hope. The submitter supports the concept of pedestrian and cycle access but considers the location of the walkway should not be predetermined through the plan.

OS150.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Oppose	Delete T-35A from Schedule 17.14A as it relates to 128 and 130 Main Road Hope. Alternatively, amend the transport trigger so that the White Road/SH6 intersection upgrade is not required for the subject site and instead applies to T-35A excluding 128 and 130 Main Road Hope.	The submitter considers that where wastewater, water supply and stormwater servicing requirements are met there is no reason why development of the site should be delayed pending upgrade of the White Road/SH6 intersection. The submitter considers the site does not rely on, or place pressure upon, that intersection and should therefore not be subject to that trigger. My view is that this is a cleaner submission than Booster. The underlying outcome is still "industrial zone now, not later", but Vicmatt has a much stronger site-specific servicing argument that should be reflected in the decision reasons.	Oppose inclusion of 128 and 130 Main Road Hope within Schedule 17.14A as a deferred site location and, if deferred zoning remains, oppose the requirement for the White Road/SH6 intersection upgrade as a trigger for uplifting the deferred zoning.

Diane and Athol Arbuthnot

Submitter 151

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS151.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 52 - Proposed PC81 - Zone - Richmond, Lower Queen St	Oppose	Do not proceed with intensification affecting Berryfield Drive. Reassess traffic, access, and parking impacts before any rezoning or development is enabled.	The submitters consider the proposed housing density unsafe and impractical due to existing traffic volumes, limited road capacity, unclear access arrangements, and insufficient parking provision.	The submitters oppose PC81's housing intensification provisions due to increased building height and density. They raise significant concerns about infrastructure capacity, particularly road safety and congestion on Berryfield Drive. They state the street already carries buses, preschool traffic, movie-theatre parking, and general vehicle movements, and that additional housing will make the road unsafe or impassable. They also note uncertainty around driveway locations and access points for proposed housing, which they consider "vitally important" for traffic safety. They believe parking demand will exceed what is provided.

Pete Jepson

Submitter 152

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS152.1	Proposed Plan Change No. 81 > Maps > Area Maps > 11 - Proposed PC81 - Area - Motueka, McBrydie Rd	Support	Support the proposals described on Area Map 11 and Zone Map 41. The submitter did however seek information regarding responsibility for construction of the indicative roads and walkways.	The submitter states they support the proposals described on Area Map 11 and Zone Map 41.	The submitter supports the proposals described on Area Map 11 and Zone Map 41.

OS152.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 41 - Proposed PC81 - Zone - Motueka, McBrydie Rd	Support	Support the proposals described on Area Map 11 and Zone Map 41.	The submitter states they support the proposals described on Area Map 11 and Zone Map 41.	The submitter supports the proposals described on Area Map 11 and Zone Map 41.

David Ogilvie

Submitter 153

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS153.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 39 - Proposed PC81 - Zone - Motueka, Cnr Atkins St - Pa St	Support	Support papakainga opportunities in Motueka at T-189a (Pa St and Atkins St intersection).	I approve the provisions for papakainga opportunities in Motueka per MOTC4 (Pa St and Atkins St intersection). The recent development on Queen Victoria St of the papakainga –Te Ara o Turanga apeke is a striking local example.	Support papakainga opportunities in Motueka at T-189a (Pa St and Atkins St intersection).
OS153.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 38 - Proposed PC81 - Zone - Motueka Central	Amend	Consideration of the following for the MDRZ of T-190a/b; • the infrastructure requirements (three waters, transportation) be brought forward to 2027-29 in the forthcoming Long Term Plan 2027-37 • the current owners to indicate which areas of the land are culturally significant and reserved for papakainga. Also to allow and indicate the remainder as an area for “freehold titles”, similar to other subdivisions in Motueka—Pukekohatu, and Te Maatu. Refer to original submission for more information.	• The land is productive with the highest rating of productive soils (LUC 1). Existing residential on the land is minimal which seems a contradiction towards the Compact density/Medium density objective of the Plan Change. • In the Long Term Plan 2024-34 any infrastructure development for this area is not scheduled until 2034, although this may be brought forward in the 2027-37 LTP. • The land is owned by the Whakarewa Trust and/or the Wakatu Incorporation. The area is culturally highly significant for local manawhenua iwi, therefore it is unlikely any section would be sold as “freehold” title. The 1842 agreement with the NZ Company (Samuel Stephens), sanctioned by William Spain (Commissioner) in 1845 cements this cultural / historical relationship. Moreover, these ownership constraints are underlined by relevant legislation. • Refer to original submission for more information.	Motueka T-190a/b; seeks the bringing forward of infrastructure requirements in the Long Term Plan and information from the owners on cultural values associated with the land.

Joshua Rutledge

Submitter 154

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS154.1	Proposed Plan Change No. 81 > Maps > Area Maps > 15 - Proposed PC81 - Area - Richmond South	Amend	That the property at 169 White Road (CT NL 12A/1028) be rezoned residential.	The reasons for this are as follows: • Since 2007 (Under Plan Change 10) the TRMP has had policies to enable the southern expansion of Richmond through to	Rezoning of property subject to subdivision consent RM250762

				Hart Road. • Policy 6.8.3.10 of the TRMP. states the following: *"To provide for the expansion over a 20-year timeframe from 2006 to 2026, within a contained footprint and clearly identified by Spur Ridges between Hart Road and Whites Road. Richmond South Limited southward residential expansion between State Highway 6 north of Hope and Hill Street, and a local commercial node, with Stage 1 being defined by Spur Ridges between. Hart Road and Whites Road."* 169 White Road is within this area that was intended for southward residential expansion. • The infrastructure servicing issues that initially constrained development in this area have been sorted, in that there is now a Council Reservoir at 520 Hill Street providing reticulated water service to this area. There is a Council water line along the road reserve boundary. • A 150mm reticulated sewerline runs along the White Road frontage. • The property can provide on- site detention of storm water to deal with stormwater without adversely affecting downstream properties. • The property has a sealed access on White Road, which provides good road access to Richmond. • This property is part of the FDS development area T-039 as Greenfield Development Area in 2022. • It is highly unlikely that the number of infill development that is anticipated under the Plan Change 81 because infill development in Richmond is highly problematic with difficulties with flooding, stormwater and being able to develop without adversely other existing properties. Because of this more greenfield developments areas will be required and Richmond South is the logical place for new greenfield development in Richmond.	

Jamie Eggers

Submitter 155

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS155.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	That the property at 169 White Road (CT NL 12A/1028) be rezoned residential	The reasons for this are as follows: • Since 2007 (Under Plan Change 10) the TRMP has had policies to enable the southern expansion of Richmond through to Hart Road. • Policy 6.8.3.10 of the TRMP. states the following: *"To provide for the expansion over a 20-* *year timeframe from 2006 to 2026,* *within a contained footprint and clearly identified by Spur Ridges between* *Hart Road and Whites Road.* *Richmond South* *Limited southward residential expansion between State Highway 6 north of* *Hope and Hill Street, and a local commercial node, with Stage 1 being* *defined by Spur Ridges between. Hart Road and Whites Road."* 169 White Road is within this area that was intended for southward residential expansion. • The infrastructure servicing issues that initially constrained development in this area have been sorted, in that there is now a Council Reservoir at 520 Hill Street providing reticulated water service to this area. There is a Council water line along the road reserve boundary. • A 150mm reticulated sewerline runs along the White Road frontage. • The property can provide on- site detention of storm water to deal with stormwater without adversely affecting downstream properties. • The property has a sealed access on White Road, which provides good road access to Richmond. • This property is part of the FDS development area T-039 as Greenfield Development Area in 2022. • It is highly unlikely that the number of infill development that is anticipated under the Plan Change 81 because infill development	Rezone request for 169 White Road, Richmond

				in Richmond is highly problematic with difficulties with flooding, stormwater and being able to develop without adversely other existing properties. Because of this more greenfield developments areas will be required and Richmond South is the logical place for new greenfield development in Richmond.	

Jocelyn Bensemann

Submitter 156

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS156.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 46 - Proposed PC81 - Zone - Richmond South	Oppose	Decline intensification of the Kāinga Ora site in its current form, or require a site-specific process that provides detailed development information, neighbour consultation, height and privacy protections, traffic and parking plans, construction management controls, contamination management, landscaping, ongoing maintenance standards, and clear communication protocols.	The submitter considers the proposed intensification premature and unsafe without clear plans, neighbour engagement, and robust controls to manage privacy, amenity, traffic, construction, contamination, and long-term maintenance.	The submitter is concerned about the possible intensification and redevelopment of a neighbouring Kainga Ora property within the MDRZ in Richmond. The submitter does not think that sufficient information about the scale, design, layout, height, access, parking, or construction impacts of the proposed redevelopment has been provided. They highlight significant potential effects including privacy loss, shading, noise, traffic safety, parking pressure, stormwater capacity, construction impacts, and long-term site management. They also reference the 2025 fire and asbestos contamination as evidence of poor communication and site management, reinforcing the need for stronger controls and accountability. See full submission for photographs of vacant site.

Katania Terraces Ltd (David Orange and Jade Murphy)

Submitter 157

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS157.1	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words	Support	Retain the net density definition as notified.	The submitter supports the introduction of a net density framework to guide residential development outcomes within growth areas and development areas.	Support the new definition of "net density" inserted through Plan Change 81.
OS157.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed	Support	Retain Planning Map 80-02 as notified in relation to T-104a and T-104b.	The submitter supports the rezoning of T-104b to Residential Zone and retention of Residential zoning over T-104a as shown on the notified planning maps	Support retention of the Residential Zone over T-104a and rezoning of T-104b from Rural 1 Zone to Residential Zone.

	PC81 - Zone - Brightwater Central				
OS157.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Support	Retain the amended Brightwater Development Area definition as notified.	The submitter supports inclusion of the site within the Brightwater Development Area overlay because it enables future residential development and a wider range of housing opportunities consistent with the Future Development Strategy.	Support inclusion of T-104a and T-104b within the Brightwater Development Area.
OS157.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Support	Retain Policies 6.16.3.1, 6.16.3.1A and 6.16.3.1B as notified.	The submitter supports the policies because they introduce the submission site into the planning framework, provide for new residential development areas, require a variety of lot sizes and housing options, and promote higher-density housing outcomes within the Brightwater Development Area.	Support Policies 6.16.3.1, 6.16.3.1A and 6.16.3.1B relating to residential growth and State Highway noise within the Brightwater Development Area.
OS157.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Support	Retain Policy 6.16.3.8 as notified.	The submitter supports the policy amendments which introduce the site into the existing framework relating to State Highway noise management.	Support Policy 6.16.3.8 as amended to include the submission site.
OS157.6	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3 Residential Zone	Amend	Amend Figure 16.3AB(ii), Rule 16.3.3.1B, Rule 16.3.3.2A(c)(i), and Rule 16.3.3.2C to provide a site-specific subdivision framework for the land between Katania Heights Road and the Brightwater Deviation State Highway that: • enables a minimum allotment size of 200m²; • provides for a minimum density of 12 dwellings per hectare; • allows subdivision proposals to be considered through Controlled or Restricted Discretionary activity pathways rather than Non-Complying activity status.	The submitter considers the current 270m² minimum allotment size prevents a practical subdivision response to the site's topographic constraints. Larger lots are required on steeper parts of the site, which necessitates smaller allotments on the flatter land to achieve the intended yield. The submitter considers a 200m² minimum allotment size is consistent with the approach applied to Wakefield Development Areas and would better support housing affordability, housing choice, efficient land use and implementation of the Future Development Strategy growth objectives.	Support the Brightwater Development Area framework but seek amendments to the minimum allotment size and density provisions applying to the Katania Heights site. The submitter considers the notified minimum allotment size of 270m² does not appropriately reflect the site's triangular shape, topography and constrained developable area. The submitter seeks a site-specific framework that allows allotments down to 200m² while achieving a minimum net density of 12 dwellings per hectare and providing a wider range of housing options and lot sizes.
OS157.8	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Amend	Amend Planning Map 80-02 to relocate the indicative walkway to a more practical alignment that: • avoids the steep western slopes; • provides a logical connection to the existing Katania Heights residential area; and • aligns with the submitter's proposed development layout.	The submitter supports pedestrian connectivity but considers the notified alignment would unnecessarily constrain development, reduce privacy, increase management requirements and be less useful to future residents. A lower-gradient route integrated with the future road network is considered more practical and better aligned with the purpose of the Brightwater Development Area.	Support the inclusion of an indicative walkway connecting the future development area to the existing Katania Heights neighbourhood but oppose the location shown on the planning maps. The submitter considers the current alignment traverses steep and constrained land and does not reflect a practical development layout for the site.
OS157.9	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Amend	Amend the indicative road shown on Planning Map 80-02 to a more practical alignment that: • avoids traversing the centre of the site; • follows a site boundary where practicable;	The submitter considers the notified road alignment lacks planning justification because it connects to land that is neither identified for growth through the Future Development Strategy nor proposed for rezoning through PC81. The submitter considers the	Support the principle of future road connectivity but seek amendment to the indicative road alignment shown on Planning Map 80-02. The submitter distinguishes between two indicative roads identified in PC81 and opposes the alignment traversing the

			• reflects the site's topography and development constraints; • provides a logical future connection to the northern end of the site; and • aligns with the submitter's proposed development layout.	alignment creates an unnecessary development constraint and is inconsistent with the site's planned layout. The submitter does not oppose the separate Coppermine Crescent to Jeffries Road connection because that road is outside the site and responds to identified transport issues	submission site and connecting through sites T-003 and T-031, while not opposing the separate Coppermine Crescent to Jeffries Road connection identified in the technical assessments.
OS157.10	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater	Support	Retain Issue 6.16.1.1 and amend Policy 6.16.3.3A to clarify that flood hazard risk associated with a possible dam break hazard is assessed through site-specific technical assessment at the time of subdivision or development consent. Specifically amend Policy 6.16.3.3A to refer to management of flood hazard risk associated with a possible dam break hazard.	The submitter acknowledges the existence of a private irrigation dam on adjoining land and accepts that potential dam break hazards can be recognised within the planning framework. However, the submitter considers the extent of any actual flood hazard risk affecting the site should be established through technical assessment undertaken at the resource consent stage rather than being presumed through the district plan provisions.	Support the inclusion of dam break hazard as a planning consideration for the Brightwater Development Area but seek clarification regarding how potential dam break hazards are assessed and managed. The submitter considers any potential flood risk associated with a dam break hazard should be assessed through site-specific technical information provided as part of future subdivision or development applications.

Anna Macfarlane

Submitter 158

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS158.1	2-Out of Scope	Amend	Not specified.	The land at 170 Stafford Drive, Ruby Bay has a long-established mixed-use nature and the submitter requests consideration of the land at a policy level rather than through the resource consent process. The landowner, Carol Cromie, wishes to have the option of subdividing the land with the intention to sell some sections, as the task of maintaining the mixed use of the site has become onerous on the landowner. Under the current TRMP rules, subdivision is prohibited on this site (a resource consent cannot be applied for). Please see original submission for more details - the submitter gives a lot of context to the anomaly.	The submitter wishes to have a planning anomaly on their property remedied through the PC81 process.

Stephen Malcolm

Submitter 159

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS159.1	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Support	Retain Objective 5.2.2 as amended	The submitter supports the amended objective because it recognises that amenity values will change over time as urban growth and development occurs.	Support the amended Objective 5.2.2 relating to maintenance and enhancement of amenity values while recognising that amenity values in areas planned for intensification may develop and change over time.

OS159.2	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Support	Retain Policy 5.2.3.1 as amended.	The submitter supports the policy because the change foreshadows amenity change over time in the district and would include new development growth areas.	Support the amended Policy 5.2.3.1 relating to privacy and recognition that amenity may change over time as residential density increases.
OS159.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development > 6.1.2 Objectives	Support	Retain Objective 6.1.2.1 as amended.	The submitter supports the objective because the urban environment is expected to change over time as the district grows and additional urban areas are developed, including future growth areas in Richmond South.	Support Objective 6.1.2.1 relating to well-functioning urban environments that sustain towns as successful places to live, work and play.
OS159.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development > 6.1.3 Policies	Support	Retain Policy 6.1.3.1 as amended.	The submitter supports the Outline Spatial Plan framework for subdivision and development of greenfield land.	Support Policy 6.1.3.1 and the use of sustainable urban design principles, including the use of Outline Spatial Plans for subdivision and development.
OS159.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth > 6.2.3 Policies	Support	Retain Policy 6.2.3.2A as amended.	The submitter supports the amendment and notes that the policy already refers to Richmond South, where the submitter owns land within Future Development Strategy growth areas T-039 and T-121.	Support amended Policy 6.2.3.2A encouraging medium density development in identified development areas.
OS159.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Support	Retain Objective 6.3.2.3 as notified.	The submitter supports the objective requiring development sequencing and infrastructure provision in deferred growth areas	Support Objective 6.3.2.3 relating to appropriately sequenced development within deferred zones and provision of infrastructure.
OS159.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Retain Policy 6.3.3.1B as notified.	The submitter supports the policy because it provides for identification of additional land for residential development while recognising associated infrastructure requirements over time.	Support Policy 6.3.3.1B relating to providing minimum sufficient residential capacity through identification of land appropriate for residential development.
OS159.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Retain Policy 6.3.3.1C as notified.	The submitter supports development occurring at the appropriate time when services are available.	Support Policy 6.3.3.1C requiring development to occur when infrastructure is available and capable of servicing development.
OS159.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Retain Policy 6.3.3.5A as notified.	The submitter supports the policy amendment and the Outline Spatial Plan framework for establishing well-connected road and active transport networks for greenfield development sites.	Support Policy 6.3.3.5A promoting well-connected and efficient road and active transport networks through Outline Spatial Plans and indicative roads, reserves and walkways.
OS159.10	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.1 Issue	Support	Retain Issue 6.4A.1.1 as notified.	The submitter supports the issue because it is sufficiently worded to apply to the whole district and allows for both intensification and greenfield opportunities over the long term	Support Issue 6.4A.1.1 relating to provision and availability of suitably located housing land capacity within the urban environment.
OS159.11	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Support	Retain Objective 6.4A.2.1 as notified.	The submitter supports the objective and considers all methods of providing residential capacity should be considered to meet demand, not solely intensification.	Support Objective 6.4A.2.1 relating to sufficient residential capacity to meet demand.
OS159.12	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Support	Retain Objective 6.4A.2.2 as notified.	The submitter supports the objective because it can apply to both brownfield and greenfield development within identified growth areas	Support Objective 6.4A.2.2 relating to a well-functioning urban environment through intensification that provides a variety of housing types and sizes.

OS159.13	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Retain Policy 6.4A.3.3 as notified.	The submitter supports the policy because a range of residential densities and forms are needed and additional greenfield development should remain available to provide housing choice, including traditional residential sections.	Support Policy 6.4A.3.3 providing for a choice of residential densities and forms within the district.
OS159.14	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Retain Policies 6.4A.3.3, 6.4A.3.4, 6.4A.3.7, 6.4A.3.8 and 6.4A.3.10 as notified	The submitter supports these policies because they provide for a range of residential densities and housing forms, enable both intensification and greenfield growth opportunities, maintain sufficient long-term residential land supply, and ensure development is staged alongside the provision of infrastructure. The submitter considers the policies appropriately recognise the role of deferred residential growth areas and support the Future Development Strategy approach of providing additional residential capacity over time, including through future growth areas such as T-039 and T-121.	Support Policies 6.4A.3.3, 6.4A.3.4, 6.4A.3.7, 6.4A.3.8 and 6.4A.3.10 relating to housing choice, residential intensification, future residential growth areas, deferred residential growth and infrastructure-led development. The submitter supports the overall framework for providing sufficient residential capacity, enabling a range of residential densities and housing forms, managing future growth through deferred zoning, and ensuring development occurs when supporting infrastructure is available.
OS159.15	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Retain Policy 6.4A.3.11 as notified.	The submitter supports the policy because it recognises the need to identify and plan for future residential growth opportunities beyond currently developed areas and deferred growth areas. The submitter considers the policy is consistent with the Future Development Strategy approach of providing sufficient long-term residential development capacity and supports the future development potential of Richmond South growth areas, including Future Development Strategy sites T-039 and T-121.	Support Policy 6.4A.3.11 and the recognition of future residential growth areas to provide long-term residential development opportunities beyond currently zoned and deferred residential land.
OS159.16	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Retain Policy 6.4A.3.5 as notified and insert an additional policy requiring an Outline Spatial Plan to be prepared for future greenfield Residential Zone land of 5,000m² or greater, or other appropriate future growth areas identified in the Nelson Tasman Future Development Strategy 2022–2052, prior to rezoning or development.	The submitter supports the Outline Spatial Plan framework and considers it will assist in achieving coordinated and efficient urban development outcomes. The submitter considers the same planning approach should be applied to future Residential Zone growth areas as is proposed for Medium Density Residential Zone land, particularly within future growth areas such as T-039 and T-121 in Richmond South. The submitter considers Outline Spatial Plans are an effective method to coordinate infrastructure, transport networks, open space, reserve provision, density outcomes and urban form, and provide a consistent framework for future greenfield residential development.	Support Policy 6.4A.3.5 and the use of Outline Spatial Plans to provide integrated planning for roads, transport connections, reserves, open space, infrastructure and urban form within development areas. However, the submitter considers the Outline Spatial Plan framework should not be limited to Medium Density Residential Zone land and should also apply to future greenfield Residential Zone growth areas identified through the Future Development Strategy.
OS159.17	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond > 6.8.3 Policies	Support	Retain Policies 6.8.3.10 and 6.8.3.11 as notified.	The submitter supports the use of deferred zoning to manage future business growth in a coordinated manner and to ensure development occurs when appropriate infrastructure is available. The submitter	Support Policies 6.8.3.10 and 6.8.3.11 relating to deferred Mixed Business and Light Industrial zoning and the staged release of business land. The submitter supports the framework for providing

				considers the policies are consistent with the Future Development Strategy approach to staged urban growth and support the provision of future business and industrial land capacity while maintaining an orderly pattern of development and infrastructure delivery.	future business land through deferred zoning and recognises the importance of coordinating future development with infrastructure provision and growth management planning.
OS159.18	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3 Residential Zone > 16.3.3.1 Controlled Subdivision (Residential Zone - Standard Density Development)	Support	Retain Rule 16.3.3.1 as notified.	The submitter supports Outline Spatial Plan areas being incorporated into the Residential Zone subdivision rules where relevant. The submitter considers this approach will support coordinated future greenfield development, including future development of FDS sites T-039 and T-121.	Support amendments to Rule 16.3.3.1 that incorporate Outline Spatial Plan areas within the Residential Zone subdivision framework.
OS159.19	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Support	Retain Rules 16.3.3A.1, 16.3.3A.2, 16.3.3A.3 and 16.3.3A.5 as notified.	The submitter supports the proposed subdivision framework because it enables vacant allotment subdivision within Outline Spatial Plan areas and recognises that there will continue to be demand for greenfield residential sections. No changes are requested to the proposed subdivision rules	Support the proposed Medium Density Residential Zone subdivision rules that enable vacant allotment subdivision within Outline Spatial Plan areas.
OS159.20	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Support	Retain Schedule 16.3A as notified.	The submitter supports the additional assessment criteria because they assist in ensuring consistency with applicable Outline Spatial Plans. No changes are requested.	Support the proposed additional subdivision assessment criteria relating to comprehensive development and consistency with Outline Spatial Plans.
OS159.21	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Support	Retain Schedule 16.3D as notified.	The submitter supports the new Outline Spatial Plan framework because it provides a coordinated approach to land use, infrastructure provision and environmental management and supports long-term growth planning. No changes are requested.	Support the introduction of Schedule 16.3D and the Outline Spatial Plan framework as a structured method for guiding the sustainable development of growth areas and larger sites.
OS159.22	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Support	Retain Schedules 16.3D.1 to 16.3D.12 as notified.	The submitter supports the Outline Spatial Plan framework because it enables coordinated greenfield development and provides a model that can inform future development of Richmond South, including FDS sites T-039 and T-121.	Support the use of Outline Spatial Plans in identified growth areas throughout the district.
OS159.23	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Support	Retain Schedule 17.14A as notified in relation to T-35A and T-122A.	The submitter supports the inclusion of T-35A and T-122A as deferred zone sites because the business growth areas are considered an important part of the Hope/Richmond South growth framework and will assist in supporting future residential and business development over time.	Support inclusion of Main Road Hope deferred growth areas T-35A and T-122A within Schedule 17.14A Deferred Zone Locations.
OS159.24	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Retain sites T-35A and T-122A as notified	The submitter supports the inclusion of T-35A and T-122A because the business growth areas are considered an important part of the Hope/Richmond South growth framework and will assist in supporting future residential and business development over time.	Support inclusion of Main Road Hope deferred growth areas T-35A and T-122A within Schedule 17.14A Deferred Zone Locations.

Andrew and Susan Talley

Submitter 160

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS160.1	Proposed Plan Change No. 81	Oppose	Complete a comprehensive natural hazards and climate change risk assessment (likelihood and consequence) for areas within and surrounding individual rezoning sites.	The submitter considers the Council has not adequately assessed natural hazard and climate change risks associated with proposed rezonings. The existing assessment relies on qualitative ratings, assumes mitigation can occur within development sites, does not adequately assess surrounding areas or off-site effects, and does not sufficiently evaluate risks associated with the proposed Seaton Valley Detention and Wetland facility.	The natural hazards assessment supporting rezoning is inadequate and a comprehensive risk assessment is required.
OS160.2	Proposed Plan Change No. 81	Oppose	Update assumptions and revise natural hazards and climate change risk assessments to more accurately address off-site and residual risk implications.	The submitter considers the risk assessment incorrectly assumes stormwater mitigation will occur within development sites and does not adequately assess off-site stormwater effects, residual risks, compounding flooding effects, coastal inundation effects or future sea-level rise implications.	The natural hazards assessment does not adequately account for off-site and residual risks.
OS160.3	Proposed Plan Change No. 81	Oppose	Undertake natural hazard and climate change risk analysis for Māpua that includes detailed costing and feasibility assessment of area-wide stormwater, transport and infrastructure mitigation measures.	The submitter considers that more complex and higher-risk areas such as Māpua require detailed costing and feasibility analysis. The current assessment does not quantify capital, operating, renewal, residual-risk or external costs associated with proposed mitigation measures including the Seaton Valley Detention and Wetland facility and associated infrastructure.	Detailed hazard, infrastructure and economic analysis is required for Māpua.
OS160.4	Proposed Plan Change No. 81	Oppose	Undertake analysis comparing the proposal with alternative locations and staged development options, including use of approaches such as Future Urban Zones instead of Deferred Zones.	The submitter considers the Council has not demonstrated that the proposed pattern of development is the most efficient option and has not adequately compared the proposal with alternative locations, staging approaches or planning mechanisms.	Alternative development locations and staging options should be assessed.
OS160.5	Proposed Plan Change No. 81	Oppose	Undertake economic analysis of potential cost transfer to existing residents and ratepayers arising from natural hazard risks and incomplete information supporting Māpua rezonings.	The submitter considers the Council has not assessed the economic consequences of flood and climate change risk, including the potential transfer of costs and risks to existing residents and ratepayers. The current assessment may understate the costs and risks associated with the proposal.	The economic costs and risks associated with Māpua growth proposals should be assessed.
OS160.6	Proposed Plan Change No. 81	Oppose	Reject the Māpua components of Plan Change 81, including rezoning proposals, where sufficient natural hazard, climate change, feasibility and economic analysis has not been provided.	The submitter considers available information does not demonstrate that rezoning these sites is an efficient or appropriate method of providing housing capacity and that significant uncertainty remains regarding costs, feasibility, hazard risks and infrastructure requirements.	The Māpua rezoning proposals should be rejected because supporting hazard, infrastructure and economic assessments are insufficient
OS160.7	Proposed Plan Change No. 81	Oppose	Complete a comprehensive natural hazards and climate change risk assessment (likelihood and consequence) for the areas within and surrounding individual rezoning sites.	The submitter considers the Council's natural hazard assessment is not comprehensive because it focuses primarily on individual rezoning sites and does not	A comprehensive natural hazards and climate change risk assessment should be completed for rezoning sites and surrounding areas.

				adequately assess effects on surrounding areas that may be impacted by development enabled through the plan change. The assessment is also considered incomplete because tsunami risk assessments do not adequately account for sea-level rise effects.	
OS160.8	Proposed Plan Change No. 81	Oppose	Update assumptions and revise natural hazards and climate change risk assessments to more accurately address off-site and residual risk implications.	The submitter considers current natural hazard assessment assumptions do not adequately address off-site effects, residual risks, or the broader impacts of development on surrounding land and infrastructure.	Natural hazard assessments should more accurately assess off-site and residual risks.
OS160.9	Proposed Plan Change No. 81	Oppose	Reject the plan change if the Council does not undertake the natural hazard and climate change assessment work required by the Minister's direction.	The submitter considers the Council has not complied with aspects of the Minister's direction requiring comprehensive natural hazard and climate change risk assessment, and that the plan change should not proceed unless those deficiencies are addressed.	The plan change should be rejected if the required natural hazard assessment work is not completed.
OS160.10	Proposed Plan Change No. 81	Oppose	Undertake an analysis of applicable national policy statements, including the New Zealand Coastal Policy Statement, to determine the extent to which Plan Change 81 gives effect to those policy statements.	The submitter considers the Section 32 Report provides minimal assessment of the proposal against the New Zealand Coastal Policy Statement and other national policy statements, despite development occurring within or affecting the coastal environment and other nationally significant resources.	Additional assessment is required to determine whether the plan change gives effect to national policy statements.
OS160.11	Proposed Plan Change No. 81	Amend	Amend the provisions of Plan Change 81 to give effect to all applicable national policy statements.	The submitter considers that without further assessment and amendment there is insufficient evidence that the proposed provisions adequately give effect to national policy direction, including the New Zealand Coastal Policy Statement.	Plan provisions should be amended to give effect to applicable national policy statements.
OS160.12	Proposed Plan Change No. 81	Oppose	Reject the plan change if the required assessment and amendments necessary to give effect to applicable national policy statements are not undertaken.	The submitter considers insufficient assessment has been undertaken to demonstrate that the plan change gives effect to applicable national policy statements, including the New Zealand Coastal Policy Statement.	The plan change should be rejected if compliance with national policy statements is not demonstrated.
OS160.13	Proposed Plan Change No. 81	Oppose	Provide an updated demand and capacity reconciliation using the 2023 Census, recent consents, titles and development uptake.	The submitter considers the housing demand and capacity information relied upon by the plan change is out of date, relies on older census and survey information, and may not accurately reflect current growth patterns, housing demand or available development capacity in Māpua/Ruby Bay.	Housing demand and development capacity estimates should be updated before rezoning decisions are made.
OS160.14	Proposed Plan Change No. 81	Oppose	Amend the plan change to only actively zone land, including deferred zones, sufficient to meet updated medium-term residential demand estimates.	The submitter considers the plan change enables substantially more residential capacity than is required to meet projected demand and that the scale and timing of the proposed rezonings have not been justified. The submitter considers there is insufficient evidence that all proposed urban growth areas are required within the planning timeframe.	Residential zoning should be limited to land required to meet medium-term housing demand.
OS160.15	Proposed Plan Change No. 81	Oppose	Amend deferred zone sites within the Seaton Valley catchment in Māpua to Rural Zone or Rural Residential Zone. If future urban growth potential is to be identified, apply a Future Urban Zone rather than deferred urban zoning.	The submitter considers there is insufficient demand to justify the proposed deferred urban zoning and that the affected sites are not required to meet projected housing demand within the planning horizon relied upon by the Council. The submitter considers that a Future Urban Zone would provide a more appropriate mechanism for identifying potential future growth while requiring a future plan change before urban development could occur.	Deferred zoning in the Seaton Valley catchment should be removed and alternative zoning retained until future urban development is justified.

OS160.16	Proposed Plan Change No. 81	Oppose	Undertake an assessment that includes an options assessment, cost-benefit assessment, analysis of a do-nothing counterfactual, and risk-adjusted whole-of-life costs, including assessment of staged development options, alternative locations for development, and the costs of developer-funded infrastructure requirements.	The submitter considers the Council has not adequately assessed the economic implications of hazard mitigation and supporting infrastructure. Existing analysis does not assess alternative approaches, development staging, development in different locations, or the effects of transferring infrastructure costs to developers and future housing purchasers.	A comprehensive options assessment and cost-benefit analysis should be undertaken for hazard management and infrastructure solutions.
OS160.17	Proposed Plan Change No. 81	Oppose	Assess whole-of-life capital, operating, maintenance and renewal costs, residual and off-site losses, insurance and property market effects, and identify who ultimately bears the associated costs and risks.	The submitter considers important costs and risks associated with proposed flood mitigation and stormwater infrastructure have not been quantified, including lifecycle costs, residual risks, impacts on property owners, insurance implications and the allocation of financial responsibility between developers, residents and ratepayers.	Whole-of-life infrastructure costs and associated risks should be assessed.
OS160.18	Proposed Plan Change No. 81	Oppose	Reject Plan Change 81 if the Council does not undertake the cost-benefit and economic analysis sought by the submitter.	The submitter considers the plan change should not proceed where the requirements of the Minister's direction relating to economic assessment, hazard mitigation costs and infrastructure feasibility have not been satisfied.	The plan change should be rejected if the required economic assessment is not undertaken.
OS160.19	Proposed Plan Change No. 81	Oppose	Review and revise the evaluation of proposed urban zoning, particularly deferred zone sites within the Seaton Valley catchment, to properly assess costs and benefits, including retaining the current Rural or Rural Residential zoning as an alternative option.	The submitter considers the Council's evaluation incorrectly treats underutilisation of proposed infrastructure, including the Seaton Valley Detention and Wetland facility and road upgrades, as a cost of retaining rural zoning. The submitter considers the evaluation has not appropriately assessed what infrastructure expenditure is genuinely required, what expenditure could be avoided or deferred, and how costs should be allocated between developers, residents and ratepayers. The submitter considers this has distorted the assessment of the most appropriate zoning outcome.	The evaluation of deferred zoning sites should be revised using an appropriate assessment of costs, benefits and alternative zoning options.
OS160.20	Proposed Plan Change No. 81	Oppose	Decline the plan change if the Council does not undertake the requested analysis of zoning options and associated costs and benefits.	The submitter considers the current evaluation does not provide a reliable basis for rezoning decisions because it relies on an inappropriate counterfactual, lacks comprehensive cost analysis and does not adequately assess retaining existing zoning arrangements as an alternative.	The plan change should be declined if an appropriate zoning evaluation is not undertaken.
OS160.21	Proposed Plan Change No. 81	Oppose	Update the BERL analysis to evaluate one or more Māpua case study sites, including the implications of the proposed Seaton Valley Detention and Wetland facility, climate change and sea-level rise.	The submitter considers the BERL report is limited to qualitative assessment of the Medium Density Residential Design Matrix, relies on Richmond and Motueka case studies only, does not quantify monitoring, compliance or enforcement costs, and does not evaluate the costs and benefits of the proposed rezoning and supporting stormwater infrastructure in Māpua. The submitter considers the report therefore does not adequately inform decisions relating to Māpua growth areas.	The BERL analysis should be expanded to assess Māpua sites and the implications of the proposed Seaton Valley Detention and Wetland facility.
OS160.22	Proposed Plan Change No. 81	Oppose	Decline proposed urban and deferred zoning within the Seaton Valley and Māpua areas until sufficient technical evidence, infrastructure design and modelling demonstrates that a comprehensive stormwater management solution is available and has been provided	The submitter considers the functionality of the proposed Seaton Valley Detention and Wetland facility has not been demonstrated. The Council has not adequately assessed factors such as sea-level rise, vertical land movement, storm surge, wave setup or cumulative development	Urban and deferred zoning in the Seaton Valley and Māpua areas should not proceed until stormwater management solutions have been fully assessed and reviewed.

			for public and expert review, including review of hydraulic modelling, SVDW assumptions, cumulative development scenarios and planning triggers.	effects, and key modelling information has not been made available for independent review.	
OS160.23	Proposed Plan Change No. 81	Oppose	Decline the plan change if the BERL analysis is not updated to assess Māpua sites and the implications of the proposed Seaton Valley Detention and Wetland facility.	The submitter considers the current BERL analysis does not adequately assess the economic implications of the proposed rezonings and supporting infrastructure in Māpua and therefore does not provide a sufficient evidential basis for the plan change.	The plan change should be declined if the BERL analysis is not updated.
OS160.24	Proposed Plan Change No. 81	Oppose	Add a specific and comprehensive set of plan provisions that control and guide the development and ongoing management of the Seaton Valley Detention and Wetland facility.	The submitter considers the proposed plan relies heavily on the Seaton Valley Detention and Wetland facility as a stormwater management solution but contains little or no direction regarding its design, development, operation or long-term management. The notified provisions are considered insufficient given the importance of the facility to managing development effects.	Specific plan provisions should be introduced to manage the development and operation of the Seaton Valley Detention and Wetland facility.
OS160.25	Proposed Plan Change No. 81	Oppose	Prepare an evaluation of alternative planning mechanisms for the ownership, development and ongoing management of the Seaton Valley Detention and Wetland facility, including economic analysis of costs and benefits over the long term.	The submitter considers the Council has not adequately evaluated how the Seaton Valley Detention and Wetland facility will be owned, developed, managed and funded. The notified documents do not assess alternative governance or delivery mechanisms and do not provide sufficient certainty regarding long-term operation and responsibility.	Alternative ownership and management approaches for the Seaton Valley Detention and Wetland facility should be evaluated.
OS160.26	Proposed Plan Change No. 81	Oppose	Undertake a comprehensive evaluation of alternative approaches to managing stormwater effects from urban development, including assessment of the economic costs and benefits of those alternatives.	The submitter considers development of the Seaton Valley Detention and Wetland facility remains uncertain and that the Council has not sufficiently assessed alternative stormwater management solutions that could be used to manage the effects of future urban development.	Alternative stormwater management approaches should be assessed.
OS160.27	Proposed Plan Change No. 81	Oppose	If the Seaton Valley Detention and Wetland facility approach is retained, provide implementation timeframes for delivery and operational capacity of the facility and adjust urban zoning so that development capacity does not exceed available stormwater management capacity.	The submitter considers the plan change does not provide sufficient certainty regarding when the Seaton Valley Detention and Wetland facility will be delivered or how much growth it can accommodate. The submitter seeks stronger linkage between infrastructure delivery and the release of development capacity.	Urban development capacity should be staged to match available stormwater management capacity.
OS160.28	Proposed Plan Change No. 81	Oppose	Reject the plan change if the requested analysis, evaluation and amendments relating to the Seaton Valley Detention and Wetland facility are not undertaken.	The submitter considers the information currently available is insufficient to demonstrate that the proposed Seaton Valley Detention and Wetland facility can safely and effectively support the level of development proposed by Plan Change 81 and that the plan change should not proceed until those deficiencies are addressed.	The plan change should be rejected if the requested stormwater and SVDW analysis is not undertaken.
OS160.29	Proposed Plan Change No. 81	Oppose	Prohibit housing development within the Seaton Valley catchment, or zone land for non-urban low-intensity activities, until a dedicated stormwater management solution is fully designed, engineered and constructed, ensuring comprehensive stormwater management is in place before additional stormwater and contaminants are generated.	The submitter considers the Seaton Valley Stream estuary and Waimea Inlet are already experiencing environmental degradation, including sediment accumulation, habitat loss and contaminant loading. Additional urban development may exacerbate these effects, and a comprehensive stormwater management solution should be in place before further development proceeds.	Development in the Seaton Valley catchment should be restricted until a comprehensive stormwater management solution is designed and operational.
OS160.30	Proposed Plan Change No. 81	Oppose	Include explicit plan rules requiring development to be staged over time to limit open, exposed earthwork areas.	The submitter considers urban development will increase earthworks activity and sediment generation within a sensitive receiving environment. Staging development is	Development should be staged to reduce sediment discharges and cumulative earthworks effects.

				sought to reduce sediment discharges and cumulative environmental effects during construction.	
OS160.31	Proposed Plan Change No. 81	Oppose	Amend plan provisions to require a comprehensive catchment-scale assessment of contaminant contributions prior to development rather than relying on assessment of individual discharges in isolation.	The submitter considers the cumulative contaminant effects of future urban development have not been adequately assessed and that assessment at an individual site scale may fail to capture effects on the wider Seaton Valley and Waimea Inlet environment.	Catchment-wide contaminant assessments should be required before development proceeds.
OS160.32	Proposed Plan Change No. 81	Oppose	Require detailed concept engineering designs and an evidence-based technical assessment demonstrating the feasibility and effectiveness of the proposed Seaton Valley Detention and Wetland facility before decisions are made on the plan change.	The submitter considers the plan change lacks technical assessments demonstrating the feasibility of proposed stormwater management solutions and does not provide sufficient information for decision-makers to determine whether the SVDW will function effectively or avoid exacerbating flooding and environmental effects.	Detailed engineering design and technical assessment of the SVDW should be completed before decisions on the plan change are made.
OS160.33	Proposed Plan Change No. 81	Oppose	Include additional plan provisions applying specifically to the Seaton Valley Detention and Wetland facility to regulate and guide its design and implementation, including management of sediment retention, contaminant treatment, flood attenuation, peak flow control, and the effects of climate change and sea-level rise.	The submitter considers the proposed SVDW is central to the management of stormwater and development effects within the catchment but that the plan does not adequately regulate or guide its design, operation or environmental performance. The submitter seeks a stronger planning framework to address flooding, contaminants, ecological effects and long-term climate change risks.	Additional plan provisions should regulate the design and operation of the Seaton Valley Detention and Wetland facility.
OS160.34	Proposed Plan Change No. 81	Amend	Include explicit plan rules requiring compulsory riparian margins, native revegetation and stream habitat restoration along Seaton Valley Stream as part of future subdivision and development.	The submitter considers the lower reaches of Seaton Valley Stream contain significant ecological values, including habitat for indigenous freshwater fauna and migratory fish species. The submitter considers future development should include measures to protect, restore and enhance stream and aquatic habitat values in accordance with freshwater management objectives.	Additional provisions should be included to protect and enhance Seaton Valley Stream and its ecological values.
OS160.35	Proposed Plan Change No. 81	Oppose	Provide a comprehensive technical assessment evaluating the risk and extent of seawater intrusion into proposed stormwater management areas and the upstream receiving environment under projected sea-level rise scenarios.	The submitter considers the proposed stormwater detention and treatment infrastructure is located within a low-lying area vulnerable to sea-level rise and coastal hazards. Seawater intrusion has the potential to compromise stormwater treatment, detention capacity and the long-term effectiveness of proposed infrastructure.	Further assessment is required of seawater intrusion risks affecting proposed stormwater infrastructure.
OS160.36	Proposed Plan Change No. 81	Oppose	Provide a comprehensive concept design and management plan demonstrating that: • stormwater detention and treatment functions will remain operational under future sea-level rise scenarios; • fish passage and aquatic ecosystem health will be protected and enhanced without reliance on barriers such as tide gates; and • the proposed urban growth area remains feasible and resilient over a 100-year planning horizon.	The submitter considers the plan change lacks an integrated assessment of whether the proposed urban growth pattern and supporting stormwater infrastructure can remain functional and environmentally sustainable over the long term. The submitter is concerned about infrastructure vulnerability, impacts on fish passage and freshwater ecology, and the long-term resilience of development in light of sea-level rise and climate change.	A comprehensive concept design and management framework should be prepared demonstrating the long-term viability of the proposed urban growth and stormwater management approach.

OS160.37	Proposed Plan Change No. 81	Oppose	Undertake full ground-truthing and spatial mapping of all RMA-defined rivers, including permanent, intermittent, ephemeral and modified watercourses, across the entire plan change area before progressing the plan change.	The submitter considers the plan change fails to identify and map numerous rivers and watercourses within the Seaton Valley catchment, including modified and intermittent streams. The absence of comprehensive mapping creates a risk that future development could adversely affect freshwater systems without their extent, values and functions being properly understood.	Rivers and watercourses within the plan change area should be fully identified and mapped before rezoning decisions are made.
OS160.38	Proposed Plan Change No. 81	Oppose	Rezone stream corridors and gully systems within the Seaton Valley catchment, including sites T-42a and T-33a, to non-urban zones such as Conservation or Open Space zones, and include plan provisions requiring riparian revegetation, stream bank stabilisation and biodiversity enhancement while prohibiting unnecessary infilling, reclamation and culverting of waterways.	The submitter considers important freshwater systems and stream corridors occur within areas proposed for urban development. The submitter is concerned that future urbanisation could result in infilling, culverting or degradation of waterways and seeks zoning and regulatory protection to maintain freshwater values, biodiversity and ecological function.	Waterways and stream corridors should be protected through non-urban zoning and specific plan controls.
OS160.39	Proposed Plan Change No. 81	Oppose	Require a comprehensive concept design for the proposed stormwater management area prior to decisions being made on the plan change, explicitly addressing modified watercourses and demonstrating application of the statutory effects management hierarchy to protect river extent and ecological function.	The submitter considers the proposed stormwater management approach, including the SVDW, has not adequately accounted for existing modified watercourses and freshwater values. The submitter seeks a detailed concept design to demonstrate how stormwater infrastructure can be developed without inappropriate loss of river extent or ecological function.	A detailed stormwater concept design should be completed before decisions are made on the plan change.
OS160.40	Proposed Plan Change No. 81	Oppose	Complete a comprehensive ecology and soil survey across the plan change area, in accordance with Ministry for the Environment Wetland Delineation Protocols, to identify and map all natural inland wetlands before progressing the plan change.	The submitter considers natural inland wetlands may exist within the plan change area, including within Seaton Valley, but have not been adequately identified, mapped or assessed. The absence of comprehensive wetland mapping creates a risk that wetlands could be adversely affected by future urban development and infrastructure works.	Comprehensive wetland mapping and ecological assessment should be completed before the plan change proceeds.
OS160.41	Proposed Plan Change No. 81	Oppose	Rezone identified natural inland wetlands and associated statutory buffer areas to Conservation, Open Space or Environmental Protection zones and include provisions that maintain hydrological connectivity and promote indigenous biodiversity restoration.	The submitter considers proposed urban development and infrastructure overlap with potential wetland areas and that specific zoning and management controls are required to protect wetland extent, ecological values and natural hydrological functions.	Natural inland wetlands should be protected through zoning and specific management provisions.
OS160.42	Proposed Plan Change No. 81	Oppose	Require concept engineering designs demonstrating that infrastructure, including the Seaton Valley Detention and Wetland facility, avoids natural inland wetlands where practicable and, where wetland loss or modification is unavoidable, identify offset areas and demonstrate compliance with the statutory effects management hierarchy before decisions are made on the plan change.	The submitter considers the proposed stormwater infrastructure may affect wetlands and associated ecological values. The submitter seeks evidence that infrastructure can be designed to avoid wetland impacts where possible and that any unavoidable effects can be appropriately managed through the effects management hierarchy.	Infrastructure proposals should demonstrate avoidance of wetland impacts and, where unavoidable, application of the effects management hierarchy.
OS160.43	Proposed Plan Change No. 81	Oppose	Provide an assessment of the ecological effects of the proposal, an assessment of the proposal's contribution to implementing the Waimea Inlet Management Strategy 2050 and Action Plan 2023–2026, and identify any amendments required to ensure the plan change contributes to achieving the Strategy, including a comprehensive assessment of the proposed Seaton Valley Detention and Wetland facility.	The submitter considers the Waimea Inlet is a sensitive environment that has already experienced degradation from sedimentation, habitat loss and contaminant inputs. The submitter considers the plan change documentation contains minimal assessment of ecological effects and does not adequately assess consistency with, or contribution to, the Waimea Inlet Management Strategy and Action Plan. The submitter is particularly concerned that insufficient assessment has been undertaken of the	Further ecological assessment and assessment against the Waimea Inlet Management Strategy should be undertaken before decisions are made on the plan change.

				ecological implications of the proposed Seaton Valley Detention and Wetland facility.	
OS160.44	Proposed Plan Change No. 81	Oppose	Complete an updated demand assessment, integrated catchment model, Seaton Valley Detention and Wetland facility business case, whole-of-life economic appraisal and independent review, and revise the evaluation of zoning options for deferred zone sites.	The submitter considers deferred zoning has been justified using incomplete information and insufficient analysis. The submitter considers additional demand, infrastructure, stormwater, catchment and economic analysis is required before decisions are made regarding the appropriateness of deferred zoning in Māpua.	Further technical, economic and infrastructure analysis should be completed before deferred zoning is retained.
OS160.45	Proposed Plan Change No. 81	Oppose	If deferred zoning is retained, amend the plan to include enforceable deferrals, maximum yield caps, staging linked to demonstrated infrastructure capacity, no-material-worsening standards for existing properties and access routes, developer funding and security requirements, and monitoring and review provisions.	The submitter considers the current deferred zoning framework lacks sufficiently clear and enforceable mechanisms ensuring development only occurs when infrastructure is available and adverse effects on existing residents, infrastructure and the environment can be appropriately managed.	Additional controls should be imposed if deferred zoning is retained.
OS160.46	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > N	Oppose	Amend the definition: 1. so that it is clear whether existing and proposed development is to be included in the calculation. 2. To remove ambiguity and uncertainty from the inclusions and exclusions. 3. Avoid exclusions being used as a means of reducing the effective density of development.	It is unclear whether the definition is intended to capture existing and proposed development, or just proposed development. Elements of the definition are subjective and imprecise. Particularly the exclusion: "Constrained by natural hazards (eg. earthquakes, slope instability, ground subsidence, inundation)". It is not clear how that constraint is to be determined, which is not appropriate for a definition that forms part of rules in the Plan. Refer to original submission table for more information.	Opposes Net density definition in Chapter 2 and seeks amendments.
OS160.47	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > M	Oppose	Amend the rule to resolve the circular reference.	The definition in effect cross references rules in which the defined term is used by referring to where dwelling density greater than 30 dwellings per hectare is enabled.	Oppose medium density development definition and seeks amendments.
OS160.48	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > I - J	Oppose	Amend the definition so it does not contain subjective elements.	The definition is imprecise and relies on subjective phrases such as 'significantly reduces'.	Amend the definition of impervious surface so it does not contain subjective elements.
OS160.49	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > P	Oppose	Amend the definition to provide a minimum level of permeability that is measurable and enforceable.	The definition is imprecise. The definition includes surfaces that allow even very small amounts of water to infiltrate. From a stormwater management and assessment perspective, surfaces with very low permeability may have little or no benefit in reducing stormwater run-off. The definition should provide a minimum level of permeability that is measurable and enforceable. This definition is also used in the definition for Site coverage, so there are consequential impacts on that definition.	Amend the definition of pervious surface to provide a minimum level of permeability that is measurable and enforceable.
OS160.50	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth	Oppose	Amend objective 6.2.2.3 and associated note to give effect to any changes made to the Regional Policy Statement in relation to housing demand and supply.	The only changes proposed to this objective or the associated note are consequential changes, which will be required to give effect to any changes to the related housing demand and supply numbers in the Regional Policy Statement.	Amend objective 6.2.2.3 and associated note to give effect to any changes made to the Regional Policy Statement in relation to housing demand and supply.
OS160.51	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Oppose	Amend policy 6.2.3.2 to provide specific direction on appropriate lot size, rather than only referring to 'smaller' lots. Policy should be added to provide specific direction to developers and decision-makers as to what the design	• The changes proposed significantly broaden the policy to one that enables medium density development throughout Māpua. • It is not clear what the difference is between 'smaller lots' referred to in this policy,	Amend policy 6.2.3.2 to provide specific direction on appropriate lot size, outcomes and areas where medium density is intended.

			expectations for smaller lot development are, and what outcomes need to be achieved. Amend the policy to be clear and explicit about the areas within which medium density development is intended.	'medium density development' referred to in Policy 6.2.3.2A and 'small residential lots' referred to in Method 6.2.20.1(b). • The proposed changes, in combination with changes to the amenity and character provisions reduce policy direction around how higher density development should be designed. • Refer to original submission for more information.	
OS160.52	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth > 6.2.3 Policies	Oppose	The policy should be amended to be clear that medium density development should only be enabled in Medium Density Residential Zones and is not enabled in Deferred Zones (and other zones). Amend the policy so that it deals with supply and does not create confusion in attempting to also deal with development design. Refer to original submission for more information.	The changes to the policy significantly broaden the policy to one that enables medium density development throughout Māpua. It is not clear whether the policy is also intended to apply to zones with a deferred MDRZ. It is unclear why this policy refers to medium density development 'that achieves a high standard of amenity…' when the objectives the policy sits under are principally dealing with supply rather than design, and other provisions in the Plan specifically deal with design. Refer to the original submission table for more information.	Oppose Policy 6.2.3.2A and seeks amendments to provide clarity.
OS160.53	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth > 6.2.20 Methods of Implementation	Oppose	Amend the method to more precisely describe the locations where increased density is to be enabled. Alternatively, retain the operative wording of this method.	This change to the method is too broad. Subdivision rules should only enable small residential lots in appropriate places and where they meet appropriate standards. Enabling increased density throughout urban areas without first evaluating what the implications of that intensification on matters like stormwater, flooding and road network capacity is likely to result in poor urban and environmental outcomes.	Amend the method 6.2.20.1(b) to more precisely describe the locations where increased density is to be enabled. Alternatively, retain the operative wording of this method.
OS160.54	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Oppose	Delete the policy 6.3.3.1A in its entirety.	This policy undermines the deferred zoning framework established in the Plan (subject to an appeal against plan change 79), which is to avoid development in un-serviced areas until services are delivered. This policy provides a wide gateway for out-of-sequence development and undermines the integrated urban growth approach. The policy also opens the door for developer-led or temporary solutions, which may be inefficient and ineffective in achieving good urban outcomes. Refer to the original submission for more information.	Delete the policy 6.3.3.1A in its entirety.
OS160.55	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Retain the policy but amend it to: 1. be clearer about how zoning is the primary tool for achieving this so that the policy isn't misconstrued as enabling out-of-sequence development through resource consent applications. 2. Remove the reference to long-term infrastructure delivery. And; Add a new policy that sets out how land use planning is to	Having a policy that describes how the intensification objectives are going to be achieved in a managed way is supported. However, the policy should be clearer that zoning is the primary tool for achieving this so that the policy isn't misconstrued as enabling out-of-sequence development through resource consent applications. The reference to long-term infrastructure delivery is unnecessary in this policy – it is not clear what it is intended to achieve.	Amend Policy 6.3.3.1B to be clearer how zoning is the primary tool for achieving this policy, remove reference to long-term infrastructure and add a new policy setting out how land use planning is to be managed where infrastructure delivery is delayed.

			be managed where infrastructure delivery is delayed or is to be provided in the future. Refer to original submission for more information.	Refer to original submission for more information.	
OS160.56	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Retain the policy but amend it to be clearer that it is not to be used to enable development in deferred zones prior to the required infrastructure specified in the Plan being in place. Amend the policy to explicitly require development proposals to fully model catchment/network scale implications of development to ensure that ad-hoc development does not undermine well-functioning urban environments. Amend the reference to the NTLDM to specifically refer to the required standards within the manual, and specify any other 'appropriate standards' that should apply so that they are explicit in the provision. Suggested policy wording: When making decisions on resource consent applications, development is avoided unless infrastructure with sufficient capacity to provide for the proposed development plus other plan enabled development is in place, including: (a) Any road intersections, connections or upgrades; and (b) Servicing infrastructure, including for wastewater, water supply and stormwater. Amend the policy to say that development that is inconsistent with Outline Spatial Plans is to be avoided.	A policy that clearly sets out the expectations around the relationship between servicing and development is generally supported. However, the policy is not clear whether it is intended to address localized capacity, or broader capacity. It is not clear how this policy interacts with the deferred zoning framework to constrain development where core infrastructure assets are not in place to service the proposed development. Refer to original submission table for more information.	Amend Policy 6.3.3.1C.
OS160.57	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Amend the policy 6.3.3.5A to say that development that is inconsistent with Outline Spatial Plans is to be avoided.	The outcome set out in this policy is appropriate but it should be strengthened by saying that development that is inconsistent with these frameworks should be avoided. The Outline Spatial Plans are intended to provide a reasonable degree of certainty for the community, and significant deviation from them is likely to have significant consequential effects, including on the design and operation of centralized facilities such as the Seaton Valley Detention Wetland.	Amend the policy 6.3.3.5A to say that development that is inconsistent with Outline Spatial Plans is to be avoided.
OS160.58	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Delete the issue 6.4A.1, or move it to section 6.2 and revise the existing issues in that section.	This issue refers to meeting housing demand, however the objective that deals with housing demand is in Section 6.2 of the Plan (6.2.2.3). It is unclear why an additional issue is required if Objective 6.2.2.3 is already resolving the urban housing supply issue.	Delete the issue 6.4A.1, or move it to section 6.2 and revise the existing issues in that section.
OS160.59	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Oppose	This objective 6.4A.2.1 unnecessarily duplicates Objective 6.2.2.3.	This objective unnecessarily duplicates Objective 6.2.2.3.	This objective 6.4A.2.1 unnecessarily duplicates Objective 6.2.2.3.

OS160.60	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Oppose	Submitter seeks a redraft the objective 6.4A.2.2 to appropriately articulate the outcomes from the NPS-UD. Delete the reference to "... through intensification ...".	The objective appears to be an attempt to reflect the NPS-UD direction that more intensive residential land use occurs close to business and commercial centres and transportation nodes. However the drafting makes the objective difficult to read and apply. The objective appears to assume that a well-functioning urban environment can only be achieved through intensification. Intensification is one possible process that may, depending on other factors, contribute to a well-functioning urban environment, but it is not appropriate to signal that it is the only factor.	Submitter seeks a redraft the objective 6.4A.2.2 to appropriately articulate the outcomes from the NPS-UD.
OS160.61	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Amend the policy 6.4A.3.2 so that it only applies to land that is zoned for medium density development. This could be achieved by adding '…through the use of medium density zones…'.	The changes proposed to the policy give the policy broad scope so that it enables compact density and comprehensive development in any zone in the District. To achieve a well-functioning urban environment, areas of higher density should be plan-led rather than ad-hoc. Failure to comprehensively plan for intensification creates high potential for a range of negative outcomes. The policy should focus only on areas that have been intentionally zoned for medium density development.	Amend the policy 6.4A.3.2 so that it only applies to land that is zoned for medium density development.
OS160.62	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4 Coastal Urban Development > 6.4.3 Policies	Oppose	Remove the words 'in the Residential Zone' Amend the policy so that it does not enable medium density residential development in 'development areas' generally, and only enables it in Medium Density Residential Zones. Make consequential amendments to the planning maps.	By adding the words 'in the Residential Zone' makes the policy ambiguous and infers that medium density development is appropriate throughout the zone. The additional wording is unnecessary. Refer to original submission for more information.	Remove the words 'in the Residential Zone' Amend the policy 6.4A.3.4 so that it does not enable medium density residential development in 'development areas' generally, and only enables it in Medium Density Residential Zones. Make consequential amendments to the planning maps.
OS160.63	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Amend the policy 6.4A.3.5 to expressly articulate the land uses and activities anticipated in the Medium Density Residential Zone, or delete the policy.	This policy is unclear and appears to be an attempt to cross-reference the residential zone provisions rather than setting out the outcomes specifically anticipated for the MDRZ. This policy is another example of the plan provisions, including Outline Spatial Plans, blurring the lines between the Residential Zone and the Medium Density Residential Zone.	Amend the policy 6.4A.3.5 to expressly articulate the land uses and activities anticipated in the Medium Density Residential Zone, or delete the policy.
OS160.64	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Revise and amend the policy 6.4A.3.6 so it is clear and articulates the intended outcome.	This policy provides for two dwellings on a site as a permitted activity and appropriate use of land. But then asks that such development does not compromise more comprehensive forms of medium density. How will that element of the policy be delivered, given the policy/permitted baseline acceptance of two dwellings?	Revise and amend the policy 6.4A.3.6 so it is clear and articulates the intended outcome.
OS160.65	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4 Coastal Urban Development > 6.4.3 Policies	Oppose	Amend the policy, or add a new policy to describe what successful urban design and amenity outcomes is. Review this and associated policies in this chapter of the Plan against the provisions in other sections of the Plan that deal specifically with the relevant issues, and delete or rationalise the policies to avoid duplication and inconsistencies.	The policy refers to "successful urban design and amenity outcomes". The term is repeated several times in the policy without clearly defining it. Policy could be shorter and should be broken into two separate policies. The policy does not expressly say that it applies to the identification of Medium Density Zones. The policy should be amended to make it clear that that is the policy's function. This policy (and others in this	Amend the policy 6.4A.3.7.

			Amend the policy so it is clear that the Policy is intended to direct where Medium Density Zones are to be applied. The policy drafting should be clear that the policy does not apply more generally across the Residential Zone or development areas.	section) duplicate policies in other sections of the plan, and in many cases are inconsistent with those other sections. There are aspects of these policies that aren't consistent with NPS-UD.	
OS160.66	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4 Coastal Urban Development > 6.4.3 Policies	Oppose	Amend the policy 6.4A.3.8 to apply the Medium Density Residential Design Matrix to all Medium Density Residential Development. Amend the policy and the associated Medium Density Residential Design Matrix to ensure medium density development will achieve a better standard than 'good' and will give effect to the NPS-UD and RPS outcomes.	It is not clear why the Medium Density Residential Design Matrix would not also be applied to medium density development within Outline Spatial Plans. Refer to original submission table for more information.	Amend the policy 6.4A.3.8 to apply the Medium Density Residential Design Matrix to all Medium Density Residential Development.
OS160.67	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Amend the policy so that it does not enable subdivision or development proposals to proceed if they do not satisfy both (a) and (b). Amend the policy to be clear that subdivision and development should not be allowed if it may compromise the implementation of an Outline Spatial Plan. Amend clause (a) to be clear about what is intended.	The policy assumes that development will be allowed. The two requirements of the policy should be pre-requisites that a considered before allowing development to occur. Refer to original submission for more information.	Opposes Policy 6.4A.3.9 and seeks amendments.
OS160.68	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	Amend the policy and the planning maps to identify areas that require outline spatial plans to be prepared, and direct when and how the spatial plans are to be developed. Add additional content to this policy, or to a separate policy, to prescribe the requirements and process to be followed in developing an Outline Spatial Plans.	The policy is unclear how a group of sites would be identified and required to prepare an OSP. There is no rule mechanism in the Plan that would trigger the development of an OSP if one does not already exist. The Plan should identify areas that require OSPs to be developed for, rather than leaving it to be determined on a caseby- case basis.	Amend Policy 6.4A.3.10 and planning maps to identify areas that require outline spatial plans to be developed and direct when and how the spatial plans are to be developed.
OS160.69	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Amend the policy to be directive that development must be in accordance with outline spatial plans, and add to the policy specific circumstances and requirements when deviation from an Outline Spatial Plan may be appropriate. Amend the policy, and make any consequential changes to rules and other provisions, to provide certainty in how net density is to be determined where a development site comprises multiple land holdings.	Clause (a) of the policy is uncertain in how it should be applied. Clause (b) is confusing given it appears to require a net density (albeit without using the defined term) but only of the development site. It is also confusing that lots reserved for future comprehensive development are to be included in the net density calculation, as this will artificially affect lot size diversity if one or more larger lots are to be retained. Clause (d) does not support or enable integrated development of sites. Refer to original submission for more information.	Oppose in part Policy 6.4A.3.11 and amend.
OS160.70	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Delete Policy 6.4A.3.17.	The policy is unnecessary given there is (or should be) sufficient policy direction in other parts of the plan relating to the management of development and the provision of infrastructure to service it. This policy introduces unwarranted uncertainty about the engineering and infrastructure considerations for intensification projects.	Delete Policy 6.4A.3.17.
OS160.71	Proposed Plan Change No. 81 > Chapter 6: Urban	Amend	Add a new policy that requires assessment of whether required off-site infrastructure that the development will	Development within Medium Density Zones, including subject to Outline Spatial Plans, are likely to be reliant on	Add a new policy that requires assessment of whether required off-site infrastructure that the

	Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies		be dependent upon is in place and operational prior to development. If an Outline Spatial Plan includes centralised infrastructure or services (such as a stormwater management facility) the policy should expressly state that development within Medium Density Zones is not to proceed until the centralised infrastructure or services that the development will rely on are in place.	off-site infrastructure and services. An example is Medium Density Zones that will require the Seaton Valley Detention and Wetland facility to be operational to manage stormwater. A new policy (or policies) is required to require consideration of integration of the development with off-site supporting infrastructure.	development will be dependent upon is in place and operational prior to development.
OS160.72	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.30 Principal Reasons and Explanation	Oppose	Rewrite the principal reasons and explanation of 6.4A.30 to make clear that infrastructure limitations and natural hazards are significant drivers of the approach that must be taken to land use for residential activities in chapter 6.4A.	The principal reasons and explanation includes reference to "limitations on infrastructure capacity and availability" and "stormwater and flooding". That text is supported. However, given the natural hazard and infrastructure limitations are significant in parts of the district, these factors should be expressed as a more significant and dominant part of the reasons and explanation for the approach taken in chapter 6.4A.	Rewrite the principal reasons and explanation of 6.4A.30 to make clear that infrastructure limitations and natural hazards are significant drivers of the approach that must be taken to land use for residential activities in chapter 6.4A.
OS160.73	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond	Oppose	Delete the figure 6.8A or amend the figure so it only applies to Richmond.	It is not clear what the purpose of Figure 6.8A or how it is to be used in policies and rules. It is located in the chapter of the Plan (6.8) that deals exclusively with Richmond, but appears to apply throughout the district.	Delete the figure 6.8A or amend the figure so it only applies to Richmond.
OS160.74	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.7 Settlement Urban And Rural Centre Character, and Design and Development	Oppose	Remove the proposed changes to all provisions in Section 6.7. Amend other objectives and policies in the Plan that apply to urban areas to incorporate the elements of the provisions in Section 6.7 where they do not do so already.	The operative title of this section is Settlement Character and Design. PC81 proposes to substantially alter the scope and application of this chapter to cover 'urban and rural centres'. The result is that the objectives and policies now appear to apply to all urban areas throughout the District, and in many cases duplicate (and in some cases conflict with) objectives and policies in other sections of the Plan. Refer to original submission for more information.	Remove the proposed changes to all provisions in Section 6.7. Amend other objectives and policies in the Plan that apply to urban areas to incorporate the elements of the provisions in Section 6.7 where they do not do so already.
OS160.75	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	If comprehensive analsyis and modelling demonstrates that the SVDW is an appropriate solution for stormwater management, amend the provisions in this section of the Plan to provide a clear and directive framework for the development, management and operation of the SVDW, including requirements that individual developments must meet to ensure a sustainable and integrated stormwater management solution.	This section of the Plan does not refer to the Seaton Valley Detention and Wetland facility despite the Council's supporting documentation and s32 Report being clear that the SVDW is a core element for managing stormwater from the urban growth to be enabled by the plan change. Refer to original submission for more information.	If comprehensive analsyis and modelling demonstrates that the Seaton Valley Detention Wetland (SVDW) is an appropriate solution for stormwater management, amend the provisions in this section of the Plan to provide a clear and directive framework for the development, management and operation of the SVDW, including requirements that individual developments must meet to ensure a sustainable and integrated stormwater management solution.
OS160.76	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues	Oppose	Delete the issue. 6.15.1.3A.	The issue is unnecessary as there are already issue statements elsewhere in the plan that address the need to provide housing supply. The Councils HBA assessment demonstrates that housing supply proposed from Māpua/Ruby Bay significantly exceeds the predicated demand. It is therefore inappropriate and unnecessary to include a Māpua-focused issue regarding housing supply. There is no such issue that warrants recognition in the TRMP.	Delete the issue. 6.15.1.3A.
OS160.77	Proposed Plan Change No. 81 > Chapter 6: Urban	Oppose	Delete Issue 6.15.1.3B.	A location-specific issue relating to region-wide business land supply is inappropriate and unnecessary.	Delete Issue 6.15.1.3B.

	Environment Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues				
OS160.78	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues	Amend	Add a new issue statement that records the following issue: Development in and around Māpua is subject to multiple natural hazards, climate change and sea-level rise. Both existing and future housing and business development is at risk from these hazards, as is supporting infrastructure and assets required to enable those activities. The changing environment will make existing areas that are relied on for managing the likes of stormwater less available and suitable over time, and current day planning needs to account for those inevitable changes.	An additional issue is required to recognize that development in and around Māpua is subject to multiple natural hazards, climate change and sealevel rise. Both housing and business development is at risk from these hazards, as is supporting infrastructure and assets required to enable those activities. The changing environment will make existing areas that are relied on for managing the likes of stormwater less available and suitable over time, and current day planning needs to account for those inevitable changes.	Add a new issue statement that records the following issue: Development in and around Māpua is subject to multiple natural hazards, climate change and sea-level rise. Both existing and future housing and business development is at risk from these hazards, as is supporting infrastructure and assets required to enable those activities. The changing environment will make existing areas that are relied on for managing the likes of stormwater less available and suitable over time, and current day planning needs to account for those inevitable changes.
OS160.79	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues	Amend	Amend the issue statement to recognise all types of natural hazard that are relevant to Māpua.	The recognition of the need to recognize the vulnerability of areas to coastal inundation risk, including the Mapua light industrial area, is supported. However, the natural hazard risk in Mapua is broader than this, including flooding, storm water capacity and detention, and other matters. These ought to be recognized in the issue statement.	Amend the issue 6.15.1.10 to recognise all types of natural hazard that are relevant to Māpua.
OS160.80	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues	Oppose	Add a new issue statement that records the following issue: Stormwater network and management capacity in Māpua is constrained, and increases in stormwater discharge volumes and rates arising from new development has the potential to increase natural hazard risk to other people and property, and to the natural environment. Caution is required when considering the potential of these sites for development. Comprehensive and integrated catchment solutions are required ahead of further urban development being considered.	Stormwater network and management capacity in Māpua is constrained, and increases in stormwater discharge volumes and rates arising from new development has the potential to increase natural hazard risk to other people and property, and to the natural environment. Comprehensive and integrated catchment solutions are required ahead of further urban development.	Add a new issue statement regarding the constraints to the stormwater network and management capacity in Māpua and the potential to increase natural hazard risk to other people and property, and to the natural environment.
OS160.81	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	Delete the policy 6.15.3.1 and reinstate the operative wording.	The policy drafting is unclear, the policy attempts to deal with multiple issues, several of which are dealt with in other policies in the Plan, and the drafting provides no guidance as to what is to be achieved. The reference to “defined areas” is unclear.	Delete the policy 6.15.3.1 and reinstate the operative wording.
OS160.82	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	Re-instate the operative wording of the policy 6.15.3.5.	For the reasons outlined in the general introduction to the submission, the appropriateness of "supporting residential growth" in Māpua is disputed and has not been evidentially supported by this plan change.	Re-instate the operative wording of the policy 6.15.3.5.
OS160.83	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Amend	Amend the policy or provide a new policy to allow for avoidance of the long-term use of land, irrespective of zoning, that is at risk of exposure to inundation, coastal hazards, and sea level rise in the long term. Suggested policy wording: “To avoid the long-term use of land in Māpua that is at risk	An “avoid” policy relating to land that is at risk of exposure to inundation, coastal hazards, and sea level rise in the long term is supported. However this policy only captures long-term use of a light industrial zone. There are other zoned areas in Māpua that are also at risk of exposure to inundation,	Amend the policy 6.15.3.5A or provide a new policy to allow for avoidance of the long-term use of land, irrespective of zoning, that is at risk of exposure to inundation, coastal hazards, and sea level rise in the long term.

			of exposure to inundation, coastal hazards and sealevel rise, including in the long term."	coastal hazards, and sea level rise in the long term. Refer to original submission for more information.	
OS160.84	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	Delete the policy 6.15.3.13A.	The policy is to provide for comprehensive developments in Medium Density Residential Zones and in Outline Spatial Plan areas in Māpua. The reference to Outline Spatial Plan areas is unnecessary, as any comprehensive development should be focused in the MDRZ locations rather than the wider area.	Delete the policy 6.15.3.13A.
OS160.85	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Amend	Review and amend policy 6.15.3.18 or similar policies to ensure consistency throughout the plan and minimise duplication.	A policy that directs that development should be managed depending on the availability and capacity of infrastructure required to service it is generally appropriate. However, the policy appears to duplicate other policies in the Plan.	Review and amend policy 6.15.3.18 or similar policies to ensure consistency throughout the plan and minimise duplication.
OS160.86	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Amend	Amend the policy 6.15.3.19 by adding […] would result in significant adverse effects on the performance of those networks, the natural environment (including Waimea Inlet) or other people or property'.	The policy is generally supported. The policy should be amended to recognize that adverse effects on the natural environment, including Waimea Inlet, and other properties is a probably outcome if infrastructure to support development is not available.	Amend the policy 6.15.3.19 by adding […] would result in significant adverse effects on the performance of those networks, the natural environment (including Waimea Inlet) or other people or property'.
OS160.87	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.20 Methods of Implementation	Amend	Retain the policy 6.15.3.20 but amend clause (c) to be an avoid clause (consistent with the other clauses).	The policy is generally supported as it provides clear direction for the management of development in an integrated, sequenced and consistent manner. However, clause (c) should be amended to be an avoid clause, as interim or alternative solutions should only be allowed as an exception and only where there is clearly no impact on efficient and comprehensive delivery of planned infrastructure delivery.	Retain the policy 6.15.3.20 but amend clause (c) to be an avoid clause (consistent with the other clauses).
OS160.88	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Amend	Amend the policy to extend the matters that should be specifically managed in relation to the ecological values of the Seaton Valley stream to include, in addition to managing cats: 1. Discharges of sediment and other contaminants 2. Enhancement of riparian habitat of the stream and its tributaries 3. Protection of the extent and values of the stream and its tributaries. 4. Management of water flows to minimise habitat damage. 5. Avoiding creating fish barriers and removing existing barriers Amend the policy to require any subdivision or development proposals within the catchment to assess their actual and potential effects on Seaton Valley Stream, and control development to avoid or mitigate adverse effects.	Including a policy focused on prioritizing the ecological values of Seaton Valley Stream is supported. Teh policy should be extended to reflect the ecological context and values of the Seaton Valley Stream, and development proposals should be activity evaluated as to their contribution to the maintenance and enhancement of the stream. Refer to original submission for more information.	Amend the policy 6.15.3.22 to extend the matters that should be specifically managed in relation to the ecological values of the Seaton Valley stream.

			Add explanatory text to inform plan users of the ecological importance of the stream, its tributaries and the Waimea Inlet.		
OS160.89	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.30 Principal Reasons and Explanation	Amend	Amendments to the statement of reasons and explanation (6.15.30) for consistency with other submission points.	The submitter seeks amendments to the Statement of Reasons and Explanation to the extent required for consistency with other submission points. Refer to original submission for more information.	Amendments to the statement of reasons and explanation (6.15.30) for consistency with other submission points.
OS160.90	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Oppose	Delete Figure 16.3A (xi) Māpua Outline Spatial Plan Areas and replace it with minimum net area requirements for the relevant zones.	The table says that the minimum net density for development in the Residential Zone is specified for the Māpua Outline Spatial Plan areas is specified in the OSPs themselves. That approach is inconsistent with the policy framework, and appears to contradict the rules for the Residential Zone, which provide for a specific subdivision minimum lot area. Refer to original submission for more information.	Delete Figure 16.3A (xi) Māpua Outline Spatial Plan Areas and replace it with minimum net area requirements for the relevant zones.
OS160.91	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3 Residential Zone	Amend	Amend the Rule 16.3.3.1 clause by adding (iii) the Seaton Valley Detention and Wetland facility has been constructed with sufficient capacity to attenuate and treat stormwater generated from the proposed development. This relief to be read as alternative relief, based on submitter's general relief that PC81 be amended to remove Mapua provisions.	The Council's supporting reports and information confirm that the proposed Seaton Valley Detention and Wetland facility is an integral component of managing stormwater from urban development in the Seaton Valley catchment. However, none of the conditions of the controlled activity subdivision rule require the Seaton Valley Detention Wetland to be in place. Refer to original submission for more information.	Amend the Rule 16.3.3.1 clause by adding (iii) the Seaton Valley Detention and Wetland facility has been constructed with sufficient capacity to attenuate and treat stormwater generated from the proposed development. This relief to be read as alternative relief, based on submitter's general relief that PC81 be amended to remove Mapua provisions.
OS160.92	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Oppose	Delete the provisions in section 16.3.3A. If the provisions are retained, undertake a comprehensive review and redraft of the provisions and make any necessary amendments to ensure the rules and standards implement the policies of the Plan, and are certain and enforceable.	The provisions in this section have a substantial number of drafting and continuity issues that make them ineffective and inefficient. Refer to original submission for more information.	The provisions in section 16.3.3A have a substantial number of drafting and continuity issues that make them ineffective and inefficient.
OS160.93	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Amend	Amend the schedule 16.3C so that the standards it contains apply to urban-scale subdivisions proposed in deferred zones.	The schedule states that it only applies to specific zones. No Deferred Zones are listed. Any proposed urban-scale development in a deferred zone is therefore not required to comply with the standard. The schedule should be amended to ensure that appropriate standards within it apply to out-of-sequence applications in deferred zones.	Amend the schedule 16.3C so that the standards it contains apply to urban-scale subdivisions proposed in deferred zones.
OS160.94	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Oppose	Delete the Outline Spatial Plan. Undertake a comprehensive review and revision of the Outline Spatial Plan approach, and make amendments to ensure that the contents contains sufficient detail to enable efficient and effective implementation, and that the provisions within the OSP are objective, clear and meet the accepted drafting standards for rules in a plan.	The Outline Spatial Plan has a number of structural and functional issues and needs to be comprehensively revisited. The OSP operates as a rule in the Plan, so the provisions it contains should meet the accepted level of drafting for rules. Refer to original submission for more information.	Delete the Outline Spatial Plan 16.3D.9.
OS160.95	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Oppose	Delete the Outline Spatial Plan. Undertake a comprehensive review and revision of the Outline Spatial Plan approach, and make amendments to ensure that the contents contains sufficient detail to enable efficient and effective implementation, and that	The Outline Spatial Plan has a number of structural and functional issues and needs to be comprehensively revisited. The OSP operates as a rule in the Plan, so the provisions it contains should meet the accepted level of drafting for rules. Refer to original submission for more information.	Delete the Outline Spatial Plan 16.3D.10.

			the provisions within the OSP are objective, clear and meet the accepted drafting standards for rules in a plan.		
OS160.96	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1 Residential Zone Rules	Amend	Amend the provisions in Section 17.1 (Residential Zone Rules) as necessary to ensure they only apply to areas of Māpua that are appropriate for the characteristics of the development enabled by the provisions. Amend the provisions to avoid intensification of development in Māpua until a comprehensive stormwater management solution is identified for Māpua.	The changes to the residential zone rules are supported in part, however the provisions should be amended to ensure that the extent of the provisions as they apply to Māpua reflect and appropriate urban development approach, including the degree to which reference to Māpua development areas is appropriate.	Amend the provisions in Section 17.1 (Residential Zone Rules) as necessary to ensure they only apply to areas of Māpua that are appropriate for the characteristics of the development enabled by the provisions. Amend the provisions to avoid intensification of development in Māpua until a comprehensive stormwater management solution is identified for Māpua.
OS160.97	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Delete the provisions of 17.1A. If the provisions are retained, undertake a comprehensive review and redraft of the provisions, and make any necessary amendments to ensure the rules and standards implement the policies of the Plan, and are certain and enforceable.	There are a number of drafting and structural issues with the provisions in this section. The rule cascade is not clear. Refer to original submission for more information.	Delete the provisions of 17.1A. If the provisions are retained, undertake a comprehensive review and redraft of the provisions, and make any necessary amendments to ensure the rules and standards implement the policies of the Plan, and are certain and enforceable.
OS160.98	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.14 Deferred Zone Rules	Oppose	Amend the Table in Schedule 17.14A by removing all sites in Māpua that are deferred Residential or Deferred Medium Density Residential, Alternatively, if the deferred zone approach is retained, the details of what infrastructure is required to be delivered in Column D should be sufficiently well specified so that a reasonable plan user can readily determine whether the infrastructure has been delivered, including comprehensive details of any centralised stormwater management solution that is required to manage the effects of development in the Seaton Valley catchment.	The Plan Change proposes adding a number of locations to the schedule, including sites within Māpua. Refer to original submission for more information.	Amend the Table in Schedule 17.14A by removing all sites in Māpua that are deferred Residential or Deferred Medium Density Residential,
OS160.99	Proposed Plan Change No. 81	Oppose	Oppose in part Appendix 24 Natural Hazards Risk Level Assessments for PC81 proposed zoning changes. Revisit the assumption and risk ratings for any proposed business or industrial zones in Māpua, where it is likely that these zones will be occupied by warehousing/storage of perishable goods or hazardous substances. Amend the zoning and provisions to ensure development does not increase natural hazard risk, including to people, property and the environment beyond the zoned sites.	The submitters disagree with this rationale of the assessment. Refer to original submission for more information.	Oppose in part Appendix 24 Natural Hazards Risk Level Assessments for PC81 proposed zoning changes.
OS160.100	Proposed Plan Change No. 81	Oppose	Assess the non-market externalities against the market efficiency gains, to provide a comprehensive economic analysis in line with that specified by the Ministerial Direction.	The assessment does not meet the Ministerial direction that requires the Council to address the probable non-market economic impacts. Refer to original submission for more information.	Assess the non-market externalities against the market efficiency gains, to provide a comprehensive economic analysis in line with that specified by the Ministerial Direction.
OS160.101	Proposed Plan Change No. 81	Oppose	Undertake an assessment of a case study in the Māpua medium density zone.	While the temporal element is well covered, only two representative spatial scenarios are used to evaluate spatial impacts. Refer to original submission for more information.	Undertake an assessment of a case study in the Māpua medium density zone for Appendix 28 - Options Evaluation Mapua Development Areas.
OS160.102	Proposed Plan Change No. 81	Oppose	Undertake a comprehensive review and update of the options evaluation provided in Appendix 28 to appropriately account for infrastructure constraints and	The document states that the approach in Māpua reflects a balance between enabling development to meet identified housing needs and recognising infrastructure	Undertake a comprehensive review and update of the options evaluation provided in Appendix 28 to appropriately account for infrastructure

			the wider impacts of intensification, and update the plan provisions to reflect the updated analysis.	constraints and uncertainty, resulting in a planning framework that enables growth where it is feasible, while avoiding reliance on infrastructure capacity that is not yet established. Refer to original submission for more information.	constraints and the wider impacts of intensification, and update the plan provisions to reflect the updated analysis.
OS160.103	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Oppose	Remove the Māpua sites from Schedule 17.14A and make any consequential changes to the planning maps or amend the Māpua sites to include clear, measurable and certain infrastructure and servicing requirements.	The infrastructure triggers in Schedule 17.14.A are imprecise and uncertain as to when they have been satisfied, both as to exactly what infrastructure is required to be delivered, and to what level of service, and whether the trigger is considered to have been met if only some of the items are delivered. Refer to original submission for more information.	Remove the Māpua sites from Schedule 17.14A and make any consequential changes to the planning maps or amend the Māpua sites to include clear, measurable and certain infrastructure and servicing requirements.
OS160.113	Proposed Plan Change No. 81	Oppose	Evaluate the removal of deferred zoning from Māpua sites and rezone those sites to Rural Zone, Rural Residential Zone or Future Urban Zone where appropriate.	The submitter considers deferred zoning is not the most appropriate planning mechanism for identifying future urban growth and that alternative zoning approaches may provide greater certainty, flexibility and transparency while avoiding premature urban development expectations.	Deferred zoning in Māpua should be reconsidered and alternative zoning options assessed.
OS160.114	Proposed Plan Change No. 81	Amend	If a Future Urban Zone is adopted, introduce objectives, policies and rules that: • enable ongoing rural land use; • require resource consent for subdivision and development that may compromise future urban development; and • avoid urban subdivision and urban development until future rezoning occurs through a plan change process.	The submitter considers that if a Future Urban Zone is used to identify longer-term growth opportunities, additional provisions are required to ensure land remains available for future urban development while preventing activities that could compromise future planning outcomes.	If a Future Urban Zone is applied, a supporting framework should be included to protect future urban development opportunities.
OS160.115	Proposed Plan Change No. 81	Oppose	Amend the proposed plan change provisions to improve clarity and certainty, ensure clear linkages between objectives, policies and other provisions, draft objectives as outcomes and policies as implementation mechanisms, and ensure amendments to existing provisions retain the intended effect of operative provisions.	The submitter considers many provisions are poorly drafted, important policy relationships are unclear, and amendments to existing provisions have altered their effect without adequate redrafting. The submitter considers this reduces certainty and makes the plan more difficult to interpret and apply.	Plan provisions should be redrafted to improve clarity, certainty and consistency.
OS160.116	Proposed Plan Change No. 81	Amend	Amend the provisions to use consistent terminology and provide certainty regarding where and how provisions are intended to apply.	The submitter considers inconsistent terminology and drafting creates uncertainty regarding interpretation and implementation of the proposed provisions.	Consistent terminology should be used throughout the plan change.
OS160.117	Proposed Plan Change No. 81	Amend	Amend and restructure the provisions so that important topics, including intensification and quality urban form, are addressed through a single objective supported by clearly linked implementing policies.	The submitter considers key planning themes are fragmented across multiple objectives and policies, reducing transparency and making it difficult to identify a coherent policy direction.	Important planning topics should be addressed through a more coherent objective and policy framework.
OS160.118	Proposed Plan Change No. 81	Amend	Broaden the scope of the plan change to include provisions addressing natural hazard decision-making and climate change resilience in the context of urban growth, consistent with national direction including the NPS-UD and NPS-NH.	The submitter considers natural hazards are one of the principal constraints to urban growth in Tasman and that the plan change does not adequately address climate resilience or risk-based planning. The submitter considers this is particularly important given delays in related natural hazards planning work.	The scope of the plan change should be expanded to address natural hazards and climate resilience.

OS160.119	Proposed Plan Change No. 81	Amend	Amend the plan change provisions to provide stronger and more directive policies prioritising intensification over greenfield expansion and avoiding unanticipated or out-of-sequence development unless it can clearly demonstrate a well-functioning urban environment.	The submitter considers the current provisions provide inconsistent signals regarding intensification and greenfield growth and may undermine demand for medium-density housing and urban consolidation outcomes.	The plan should place greater emphasis on intensification over greenfield expansion.
OS160.120	Proposed Plan Change No. 81	Oppose	Strengthen plan provisions addressing the management of environmental and infrastructure constraints.	The submitter considers the plan change does not adequately integrate growth management with environmental, infrastructure and natural hazard constraints and therefore does not provide a sufficiently robust framework for decision-making.	Stronger direction should be provided regarding environmental and infrastructure constraints
OS160.121	Proposed Plan Change No. 81	Amend	If residential development of land within the Seaton Valley catchment is considered in the future, replace the deferred zoning approach with a Future Urban Zone or another appropriate planning mechanism that requires a future plan change to determine whether the land is suitable for urban development when sufficient information is available. Give effect to any alternative relief necessary to achieve that outcome.	The submitter considers land within the Seaton Valley catchment is currently unsuitable for urban development because of uncertainty regarding flooding, stormwater, infrastructure and environmental effects. The submitter prefers a planning framework that preserves future options while requiring a future evidential assessment before urban zoning occurs.	Future Urban Zones should be used instead of deferred zoning for Seaton Valley land if future urban development is to be considered.

Ian and Carol Greenall

Submitter 161

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS161.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 32 - Proposed PC81 - Zone - Mapua, Aranui Rd	Amend	Retain MDRZ standards but amend provisions to ensure groundwater protection and stormwater management for development at 29 Jessie Street. Require assessment and mitigation of effects on neighbouring bores and stormwater capacity.	The submitters consider that while MDRZ is acceptable, development on the adjacent site poses risks to their water supply and local stormwater systems, which must be addressed before rezoning proceeds.	The submitters generally support the key standards proposed for the MDRZ. Their concerns relate specifically to the potential subdivision and development of the neighbouring property at 29 Jessie Street (T-37a and T-37b). They state that earthworks and housing construction on this site could affect groundwater levels and compromise the bore at the foot of their section, which is their main water source. They also highlight the need for adequate stormwater provision to manage increased runoff from any new development enabled by rezoning.

Orange Family Trust & Orange Building Group Limited

Submitter 162

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS162.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Support	Retain the Medium Density Residential Zone and associated residential intensification provisions as notified	The submitter supports the introduction of the Medium Density Residential Zone and associated intensification provisions because they assist in giving effect to the Future Development Strategy and the National Policy	Support the introduction of the Medium Density Residential Zone and associated residential intensification provisions as a necessary and overdue response to the housing and growth requirements identified through the

				Statement on Urban Development and support the provision of additional housing capacity within the district	Future Development Strategy and the National Policy Statement on Urban Development 2020. The submitter supports the provision of additional housing capacity, a wider range of housing types and densities, and a planning framework that contributes to a well-functioning urban environment
OS162.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Support	Retain the proposed growth areas and deferred business and industrial zoning framework as notified	The submitter supports the proposed rezoning of housing and business growth areas because it implements the Future Development Strategy and provides for coordinated long-term urban growth and employment opportunities within the district.	Support the rezoning of Future Development Strategy growth areas for housing and business development, including the deferred Mixed Business Zone at T-122A and deferred Light Industrial Zone at T-35A. The submitter supports the staged growth framework proposed by PC81 and the provision of housing and business land to support a well-functioning urban environment.
OS162.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Support	Retain the proposed Outline Spatial Plan framework as notified.	The submitter supports the Outline Spatial Plan framework because it provides an integrated approach to planning future urban development and assists in coordinating infrastructure and growth outcomes across large development areas.	Support the proposed Outline Spatial Plan framework as a method for guiding the sustainable development of growth areas and larger sites. The submitter supports the use of Outline Spatial Plans to coordinate land use, infrastructure, transport, open space and urban form outcomes.
OS162.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	Amend PC81 to: • extend the Richmond Urban Area to include the White Road (Richmond South) Outline Spatial Plan area (T-038); • amend Planning Map 80-24 to show the site as Rural 1 Deferred Medium Density Residential Zone; • include the White Road (Richmond South) Outline Spatial Plan as a new entry in Schedule 16.3D; and • amend Schedule 17.14A to include T-038 as a deferred zone location linked to infrastructure identified for delivery within the next 10 years of the Long Term Plan.	The submitter considers the requested relief is consistent with, and intended to be integrated with, the growth framework proposed through PC81. The submitter does not seek amendments to the overarching objectives, policies or rules of PC81 beyond the planning map amendments and schedule inclusions necessary to incorporate T-038 into the deferred urban growth framework.	Seek inclusion of the White Road (Richmond South) Outline Spatial Plan Area (T-038) within the PC81 growth framework through deferred Medium Density Residential zoning, a new Outline Spatial Plan and associated deferred zoning provisions. The submitter considers the requested relief is intended to complement and integrate with the growth framework established by PC81 rather than alter the underlying objectives, policies or rules.
OS162.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Support	Retain Objective 5.2.2 as notified.	The submitter supports the amended objective because it appropriately recognises that amenity values will change over time as urban development, residential intensification and growth occur within the district. The submitter considers the amendment acknowledges the reality of	Support the proposed amendments to Objective 5.2.2 relating to the maintenance and enhancement of amenity values while recognising that amenity values in areas planned for intensification may develop and change over time.

				planned urban change while continuing to recognise the importance of amenity values.	
OS162.6	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Support	Retain Policies 5.2.3.1 to 5.2.3.3 as notified.	The submitter supports these policies because they recognise that the urban environment will continue to evolve as growth occurs and additional housing is provided. The submitter considers the policies appropriately balance amenity outcomes with the need to provide for residential intensification, housing choice and planned urban growth, including within future development areas	Support Policies 5.2.3.1 to 5.2.3.3 relating to residential amenity, privacy, urban design and residential intensification. The submitter supports the policy framework that recognises amenity values may change over time as residential densities increase and urban areas develop.
OS162.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development > 6.1.2 Objectives	Support	Retain Objective 6.1.2.1 as notified.	The submitter supports the objective because it recognises that urban environments will continue to evolve over time as the district grows and new residential and business areas are developed. The submitter considers the objective appropriately supports planned urban growth and well-functioning communities, including future growth areas such as Richmond South.	Support Objective 6.1.2.1 relating to the creation and maintenance of well-functioning urban environments that sustain towns and communities as successful places to live, work and play.
OS162.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development > 6.1.3 Policies	Support	Retain Policy 6.1.3.1 as notified.	The submitter supports the policy because it promotes integrated and sustainable urban development and supports the use of Outline Spatial Plans as a tool to coordinate infrastructure, transport connections, open space, urban form and future development outcomes. The submitter considers this framework will assist in achieving well-planned urban growth, including within future growth areas such as T-038 in Richmond South	Support Policy 6.1.3.1 and the application of sustainable urban design principles, including the use of Outline Spatial Plans to guide subdivision and development of greenfield growth areas.
OS162.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth > 6.2.3 Policies	Support	Retain Policy 6.2.3.2A as notified	The submitter supports the policy because it promotes medium density housing development in appropriate locations and contributes to the delivery of additional housing capacity required by the Future Development Strategy and National Policy Statement on Urban Development. The submitter notes that the policy already references Richmond South and supports the role of future growth areas in providing a range of housing opportunities and helping meet future residential demand.	Support Policy 6.2.3.2A and the identification of Medium Density Housing Development Areas to provide additional housing capacity and support a well-functioning urban environment. The submitter supports the policy framework for medium density residential development within identified growth areas and considers it appropriate that future growth areas, including Richmond South, contribute toward housing supply and housing choice.
OS162.10	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Retain Policies 6.3.3.1B and 6.3.3.1C as notified.	The submitter supports these policies because they provide for the identification of additional residential land to maintain sufficient housing capacity while ensuring development occurs in a coordinated manner when the necessary infrastructure is available. The submitter considers the policies appropriately recognise the relationship between growth, servicing capacity and long-term infrastructure planning, and are consistent with the Future Development Strategy and National Policy Statement on Urban Development. The submitter also supports the infrastructure-led approach to future growth	Support Policies 6.3.3.1B and 6.3.3.1C relating to providing sufficient residential development capacity and ensuring urban development occurs when infrastructure is available and capable of servicing that development. The submitter supports the planning framework that links housing growth with infrastructure provision and recognises the importance of identifying additional residential land to meet future demand.

				areas such as Richmond South, where development is intended to occur in conjunction with planned infrastructure delivery.	
OS162.11	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Retain Policy 6.3.3.5A as notified	The submitter supports the policy because it promotes coordinated urban growth and provides a framework for integrating transport, open space, infrastructure and land use planning. The submitter supports the use of Outline Spatial Plans as a method for achieving efficient and connected urban development outcomes within future growth areas, including Richmond South	Support Policy 6.3.3.5A and the use of Outline Spatial Plans to promote well-connected and efficient road, pedestrian and cycle networks within growth areas. The submitter supports the use of indicative roads, reserves, walkways and integrated spatial planning to guide future urban development and infrastructure provision.
OS162.12	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Support	Retain Objectives 6.4A.2.1 and 6.4A.2.2 as notified.	The submitter supports these objectives because they recognise the need to maintain sufficient residential capacity to meet future demand and provide a range of housing options within the district. The submitter considers additional housing capacity should be delivered through both residential intensification and planned greenfield growth areas, and that a well-functioning urban environment requires a variety of housing forms, densities and development opportunities over the long term	Support Objectives 6.4A.2.1 and 6.4A.2.2 relating to the provision of sufficient residential development capacity and the creation of well-functioning urban environments that provide a variety of housing types and sizes. The submitter supports both intensification and greenfield growth opportunities as methods of achieving long-term housing supply and housing choice.
OS162.13	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Retain Policies 6.4A.3.4 to 6.4A.3.11 as notified.	The submitter supports these policies because they provide an appropriate framework for medium density residential development within planned growth areas. The submitter considers the site is capable of contributing to a well-functioning urban environment, accommodating future growth and changes in urban form and amenity, and delivering good urban design outcomes through the proposed Outline Spatial Plan framework. The submitter notes that the submission includes a bespoke Outline Spatial Plan to coordinate future development and ensure integrated and efficient use of land and infrastructure. The submitter considers future development of the site can achieve appropriate density outcomes, provide a variety of housing types and lot sizes, and utilise the proposed Medium Density Residential Zone provisions in a manner consistent with the Future Development Strategy and National Policy Statement on Urban Development.	Support Policies 6.4A.3.4 to 6.4A.3.11 relating to medium density residential development within identified growth areas, including the use of Outline Spatial Plans, provision for a range of housing forms and densities, integrated and efficient development, coordinated subdivision and development, urban design outcomes, and density requirements within Medium Density Residential Zone areas subject to an Outline Spatial Plan. The submitter considers the proposed Medium Density Residential Zone framework appropriately provides for planned urban growth and would apply to future development of the submission site.
OS162.14	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Retain Policy 6.4A.3.15 as notified.	The submitter supports the policy and considers it is consistent with the future development of the site. The submitter acknowledges that the policy will apply at the time of future development and supports the retention and planting of trees, together with the provision and enhancement of tree cover within public spaces, streets and reserves to maintain or increase urban tree cover at a neighbourhood scale.	Support Policy 6.4A.3.15 relating to the retention and planting of trees within medium density residential development and the maintenance or enhancement of urban tree cover at a neighbourhood scale.

OS162.15	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.6 Land for Commercial Activities > 6.6.3 Policies	Support	Retain Policies 6.6.3.3, 6.6.3.8, 6.6.3.9 and 6.6.3.10 as notified.	The submitter considers the proposal is consistent with these policies because the Outline Spatial Plan provides for a small neighbourhood centre intended to service the immediate residential area only. The submitter supports the role of neighbourhood centres in providing local commercial and community activities, supports commercial activities adjoining reserves and open spaces where they contribute to vibrancy and use of those spaces, and supports the ability for appropriately scaled commercial activities to occur within the Medium Density Residential Zone where they contribute to local amenity and vibrancy without compromising the function of higher-order commercial centres. The submitter considers the neighbourhood centre shown within the Outline Spatial Plan is consistent with the commercial hierarchy and neighbourhood centre role provided for by the plan.	Support Policies 6.6.3.3, 6.6.3.8, 6.6.3.9 and 6.6.3.10 relating to neighbourhood centres and small-scale commercial activities within residential environments. The submitter supports the commercial centre hierarchy, the role of neighbourhood centres in servicing local residential communities, and provisions enabling appropriately scaled commercial activities within and adjoining residential areas, reserves and open spaces. The submitter's Outline Spatial Plan includes provision for a small neighbourhood centre intended to serve the day-to-day needs of the future residential community within the site.
OS162.16	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.2 Objective	Support	Retain Objective 11.1.2.1 as notified.	The submitter supports the objective and considers the proposal is consistent with it. The submitter considers the objective will apply to the future development of the site and the broader Outline Spatial Plan area and supports the integration of transport planning, land use and infrastructure provision to achieve safe, efficient and resilient growth outcomes.	Support Objective 11.1.2.1 seeking a safe, efficient and resilient transport system that integrates with land use, supports a range of travel modes, and ensures adverse effects of subdivision, use and development on the transport system are avoided, remedied or mitigated.
OS162.17	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.3 Policies	Support	Retain Policies 11.1.3.4, 11.1.3.5A, 11.1.3.5B and 11.1.3.13 as notified.	The submitter supports these policies because the proposal is consistent with the management of transport effects and the provision of safe and efficient transport infrastructure. The submitter considers future development of the site will be required to comply with the access and transport provisions at the time of development, including the design and location of site access and the management of access onto key roads. The submitter notes that the Outline Spatial Plan demonstrates integrated transport connections through the site, including active transport links, and supports the provision of cycling and micromobility connections as part of a well-functioning urban environment. The submitter considers the proposed transport network and future development framework are consistent with the intent of these policies.	Support Policies 11.1.3.4, 11.1.3.5A, 11.1.3.5B and 11.1.3.13 relating to the management of transport effects, safe site access, limiting additional access points onto key roads, and supporting cycling, micromobility and active transport connections. The submitter considers the proposal is consistent with the transport framework proposed by PC81 and that the Outline Spatial Plan provides for an integrated transport network that supports safe access and active transport outcomes.
OS162.18	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Support	Retain the Chapter 16 subdivision framework, including Schedule 16.3A, Schedule 16.3D and the associated Outline Spatial Plan provisions, as notified.	The submitter supports the proposed subdivision and Outline Spatial Plan framework because it provides a structured and coordinated approach to the development of greenfield growth areas and larger development sites. The submitter considers the framework supports integrated infrastructure planning, efficient land use, transport connectivity, reserve provision, urban design and	Support the proposed Chapter 16 subdivision framework, including the controlled and restricted discretionary subdivision provisions, the Medium Density Residential Zone subdivision framework, the subdivision assessment criteria, the Outline Spatial Plan framework, associated explanatory provisions, and the use of Outline Spatial Plan schedules to guide development within identified growth

				long-term growth management. The submitter also considers the Outline Spatial Plan framework provides an appropriate model for future development areas and would assist in achieving coordinated development outcomes within Richmond South.	areas. The submitter supports the use of Outline Spatial Plans as a mechanism to coordinate land use, infrastructure, transport networks, reserves, open space and future urban development outcomes.
OS162.19	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Amend	Include new OSP in schedule	The submitter considers T-038 is a logical extension of Richmond South and is consistent with the Future Development Strategy, the National Policy Statement on Urban Development and the overall growth framework established by Plan Change 81. The submitter considers the site can contribute significant additional housing capacity through a deferred zoning approach linked to planned infrastructure upgrades and delivery through the Long Term Plan. The submitter further considers that the proposed Outline Spatial Plan provides an integrated framework for land use, infrastructure, transport, stormwater management, open space and future urban development and is intended to complement, rather than undermine, the planning approach established by Plan Change 81.	Seek inclusion of the White Road (Richmond South) Outline Spatial Plan Area (T-038) within the Richmond urban growth framework through deferred Medium Density Residential zoning, a new Outline Spatial Plan and associated deferred zone provisions.

John and Karen Heslop

Submitter 163

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS163.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 50 - Proposed PC81 - Zone - Richmond, Eyles Rd	Support	Apply Rural Residential (unserviced) zoning to the PC79 area and mark it as deferred until servicing capacity is confirmed. Ensure zoning and density provisions align with actual servicing capacity and geotechnical constraints.	Servicing capacity is uncertain and should not rely on neighbouring SHA developments that may not proceed. Servicing limitations must be addressed to avoid uncertainty and ensure safe, feasible development.	The submitters support the Rural Residential (unserviced) zoning for T-114a, with a controlled activity density of 1 ha, not 2 ha. They request that the area currently shown as Rural Residential (serviced) under PC79 be changed to Rural Residential (unserviced) and shown as deferred, due to limited wastewater capacity (25 HUDs until 2027) and uncertainty around neighbouring SHA developments. The submitter requests that servicing assumptions be realistic and aligned with infrastructure capacity, including wastewater, stormwater, and transport.
OS163.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones	Amend	Enable 2,500 m² lots under Restricted Discretionary subdivision provisions.	Technical reporting supports smaller lot sizes; this allows balanced subdivision design responding to site contours.	They state that parts of the site can support smaller lots (2,500 m²) based on wastewater assessments and geotechnical suitability. They request a planning framework allowing 2,500 m² lots as a Restricted Discretionary activity to enable efficient use of developable land.
OS163.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision >	Oppose	Remove or amend transport upgrade requirements for Champion Road, Silvan Road, and Eyles Road.	Road widening is impractical, unnecessary, and would adversely affect existing properties; shared paths cannot be accommodated within existing formation.	They oppose Council's recommendation to widen Champion Road and provide a 2.5 m shared path, stating there is no connectivity, insufficient road reserve width, and adverse effects on existing residents. They note Champion Road already handles high traffic

	16.3.8 Rural Residential and Closed Zones				volumes from Silvan MTB Park and is adequate. They also oppose shared path requirements on Eyles Road due to steep terrain and physical constraints.
OS163.4	Proposed Plan Change No. 81 > Maps > Area Maps > 18 - Proposed PC81 - Area - Richmond, Eyles Rd	Oppose	Amend indicative road alignment to match landowner's master plan; remove cul-de-sac dwelling limits.	Mapped alignment is not feasible due to fill and topography; rural lifestyle roads should not be constrained by residential cul-de-sac rules.	They oppose the indicative road shown on PC81 maps, noting Council previously deposited unsuitable fill in the gully, making the mapped alignment impractical. They request the road alignment follow the master plan they have previously provided. They also oppose applying cul-de-sac dwelling limits (40 dwellings) because the road functions as a rural lifestyle road.
OS163.5	Proposed Plan Change No. 81 > Maps > Area Maps > 18 - Proposed PC81 - Area - Richmond, Eyles Rd	Amend	Amend reserve/walkway location after consultation with landowner; clarify compensation process.	Current indicative location is inappropriate and was not discussed; landowner has better understanding of suitable placement.	They oppose the indicative reserve/walkway shown on PC81 maps, stating they were unaware of it and it differs from their master plan. They request consultation on location and clarity on compensation.

Adrienne Matthews

Submitter 164

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS164.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain and strengthen intensification provisions, require a comprehensive Central Richmond Intensification & Urban Design Plan, and ensure new development provides a genuine mix of housing types.	Compact growth is more efficient, protects productive land, reduces infrastructure burden, and supports walkable, well-serviced neighbourhoods.	The submitter strongly supports intensification around existing centres, mixed-use development, apartments above shops, terraces, duplexes, and papakāinga. They consider compact urban form essential for housing supply, affordability, and reducing pressure on productive land.
OS164.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Do not release major greenfield stages until transport corridor upgrades, Hope Bypass arrangements, and full servicing plans are confirmed and funded.	Growth without infrastructure creates congestion, safety issues, unfunded liabilities, and poor urban outcomes.	They oppose major greenfield growth in Richmond South, Hope, Brightwater, Wakefield and hazard-exposed areas of Motueka. They state PC81 lacks a complete, funded infrastructure plan and does not adequately address transport congestion, servicing capacity, or long-term ratepayer costs.
OS164.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Publish a district-wide productive-land account and remove or defer sites where intensification or lower-productivity alternatives exist.	Productive land is irreplaceable and essential for food production; fragmentation and rezoning undermine long-term viability.	They oppose rezoning Rural 1 land and highlight significant historic loss of horticultural soils. They state PC81 does not provide a cumulative productive-land loss assessment.
OS164.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	Require hazard, access, insurability, and service-continuity assessments before zoning becomes operative.	Christchurch demonstrated that hazard-exposed neighbourhoods create enormous public liabilities; zoning must avoid foreseeable risks.	They oppose zoning in areas with liquefaction, flooding, coastal inundation, rising groundwater, or unreliable access - particularly in Motueka. They argue hazard assessments must occur at the planning stage, not deferred to building consent.
OS164.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	Publish a settlement-by-settlement infrastructure and funding statement; pause growth where prerequisite projects are late or unfunded.	Ratepayers must not carry unplanned costs; growth must align with funded infrastructure.	They state PC81 lacks a clear 50-year infrastructure plan covering capacity, funding, delivery timing, maintenance, and renewal costs. They note developer contributions do not eliminate long-term public burden.

OS164.6	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	Keep T-35a deferred; limit T-122 to a small local centre; publish cumulative effects before rezoning.	Rezoning now risks ribbon development, safety issues, productive-land loss, and unfunded servicing.	They oppose commercial/light-industrial rezoning at Hope (T-35a, T-122) before bypass alignment, access strategy, and servicing are confirmed.

NZ Transport Agency Waka Kotahi

Submitter 165

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS165.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	None.	Acknowledges the need for transport infrastructure to be funded by the developer.	Supports Policy 6.3.3.1A. Acknowledges the need for transport infrastructure to be funded by the developer, no relief sought.
OS165.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Alter wording as outlined below: *For the purposes of this policy "appropriate standard" refers to, but is not limited to, the Nelson Tasman Land Development Manual. The "appropriate standard" for state highway upgrades will be determined by NZTA as the Road Controlling Authority.*	It's important that the right delegated authority decide what the "appropriate standard" is for transport infrastructure at specific locations	Support with wording alteration. Add in the following wording to Policy 6.3.3.1C "*The "appropriate standard" for state highway upgrades will be determined by NZTA as the Road Controlling Authority.*"
OS165.3	Proposed Plan Change No. 81 > Maps > Area Maps > 25 - Proposed PC81 - Area - Takaka, Park Avenue	Support	n/a	n/a	Support indicative road layout and a good connection through use of a shared path
OS165.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 56 - Proposed PC81 - Zone - Takaka, Park Ave	Support	n/a	n/a	Support development of the area being deferred until the Park Ave / SH60 is upgraded (as per Schedule 17.14A)
OS165.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Include a mechanism for the ITA recommendation requiring NZTA approval to be included in relevant PC81 schedules and rules. Include a mechanism that ensures NZTA as Road Controlling Authority is required to approve the new intersection design.	Support development of the area being deferred until the Park Ave / SH60 is upgraded (as per Schedule 17.14A).	Support with changes. Park Ave, Tākaka T-114 Include a mechanism for the ITA recommendation requiring NZTA approval to be included in relevant PC81 schedules and rules. Include a mechanism that ensures NZTA as Road Controlling Authority is required to approve the new intersection design.
OS165.6	Proposed Plan Change No. 81 > Maps > Area Maps > 09 - Proposed PC81 - Area - Motueka Central	Amend	Add NZTA Noise Overlay		See NZTA Noise Overlay to be added in Appendix 3. Refer to original submission for more information
OS165.7	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule	Amend	Amend Development Requirements - Schedule 16.3D.11 as follows:	Support the ITA which lists recommendations for transport improvements and are followed up with 'Development Requirements' that act as rules.	Support with changes. Amend Development Requirements as follows

	16.3D: Outline Spatial Plans > Schedule 16.3D.11: Outline Spatial Plan - Motueka		Access and Transport • *Two potential east–west road connections are identified to align with Wratt Street and Lowe Street. At least one connection must be provided to improve permeability and local network integration. The final intersection location and upgrade requirements must be confirmed and approved by NZTA as the Road Controlling Authority. ~~with the Council's Engineering Department~~.* Amend Development Requirements to reflect the following ITA recommendation: *Improve safety and capacity Whakarewa Street / High Street. Improve safety at College Street / Chamberlain Street intersection.*	Support protection of SH60 against intensive residential development affecting traffic safety as covered in the Development Requirements (rules). Two changes are required given that NZTA is the Road Controlling Authority for High Street Motueka / SH60	Access and Transport • *Two potential east–west road connections are identified to align with Wratt Street and Lowe Street. At least one connection must be provided to improve permeability and local network integration. The final intersection location and upgrade requirements must be confirmed and approved by NZTA as the Road Controlling Authority. ~~with the Council's Engineering Department~~.* Amend Development Requirements to reflect the following ITA recommendation: *Improve safety and capacity Whakarewa Street / High Street. Improve safety at College Street / Chamberlain Street intersection.*
OS165.8	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Amend	Development Requirements under the Outline Spatial Plans (Schedule 16.3) for this area should reference the required transport infrastructure improvements at the Māpua Dr / SH60 intersection. There is a significant amount of growth being enabled in this area and crash records show the Māpua Dr / SH60 intersection is a high-risk intersection. Refer to original submission for more information.	The Outline Spatial Plans do not have Development Requirements (Access and Transport) that relate to the Māpua Dr / SH60 intersection, however the ITA signals an upgrade is required at Māpua Dr / SH60. It should be noted that intersection improvements at Māpua Dr / SH60 are not currently funded by NZTA.	Support with changes. Amend so that all Māpua Outline Spatial Plans should reference the required transport infrastructure improvements at the Māpua Dr / SH60 intersection.
OS165.9	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Schedule 17.14A (Deferral table relating to infrastructure) should be amended so that all development areas under PC81 in and around Māpua are subject to transport improvements at the Māpua Dr / SH60 intersection. NB: NZTA will continue to work collaboratively with TDC Transportation team to ensure a suitable intersection improvement is undertaken at the right time at Māpua Dr / SH60 (preferably in advance of any development of PC81 areas). Refer to original submission for more information	Support the assessment and findings of the ITA for Māpua and inclusion of Māpua Dr/SH60 intersection improvement requirement in Schedule 17.14A.	Support with changes. Amend Schedule 17.14A so that all development areas under PC81 in and around Māpua are subject to transport improvements at the Māpua Dr / SH60 intersection
OS165.10	Proposed Plan Change No. 81 > Maps > Area Maps > 26 - Proposed PC81 - Area - Takaka, Puramahoi	Amend	See NZTA Noise Overlay to be added in Appendix 3. Refer to original submission for more information.		See NZTA Noise Overlay to be added in Appendix 3. Refer to original submission for more information.
OS165.11	Proposed Plan Change No. 81 > Maps > Area Maps > 26 - Proposed PC81 - Area - Takaka, Puramahoi	Support	NZTA Support the indicative road layout Refer to the original submission for more information.		NZTA support the indicative road layout, with one main link to SH60, and provision of an internal link road to the Light Industrial zone to the west.

OS165.12	Proposed Plan Change No. 81 > Maps > Area Maps > 26 - Proposed PC81 - Area - Takaka, Puramahoi	Amend	Include a mechanism in PC81 that ensures the required 300m sight distance / visibility is maintained in perpetuity in the area marked out below. This may include the need for minor earthworks. This area needs to remain clear of any structures or vegetation that could limit visibility to the east that could significantly affect the safety of state highway users and of those using the intersection associated with the development. Include a mechanism in PC81 that requires NZTA as Road Controlling Authority to approve the new intersection design. Include a mechanism that ensures there is no increased use of existing state highway accesses in this growth area without approval from NZTA - this is also a requirement under the Limited Access Road provisions in the Government Roading Powers Act. Include a mechanism that ensures permanent closure of any existing direct accesses to SH60 in this growth area once the new intersection and internal road link is constructed. Refer to original submission for more information.	The location of the SH60 access to this development area is suitable as long as the sight lines are maintained to support safe turning movements in this high-speed area. Once the new intersection is constructed, all other direct accesses to SH60 in this growth area should be closed.	Support with changes. Supports the proposed SH60 access location provided a 300m sight distance is maintained permanently and the visibility area remains free of structures or vegetation that could compromise road safety. They seek provisions requiring NZTA approval of the new intersection design. Once the new intersection and internal road connection are established, there should be permanent closure of all existing direct accesses to SH60 within the growth area. These measures are sought to ensure safe turning movements and protect the safety and function of the state highway network.
OS165.13	Proposed Plan Change No. 81 > Maps > Zone Maps > 62 - Proposed PC81 - Zone - Wakefield, Bird Ln	Support	NZTA would support the extension of the 50km/h zone north of the Bird Lane / SH6 intersection once the roundabout is installed.	Support Rural 1 zones being deferred until Bird Lane / SH6 intersection upgrade (roundabout) is complete. NZTA would support the extension of the 50km/h zone north of the Bird Lane / SH6 intersection once the roundabout is installed.	Support Rural 1 zones being deferred until Bird Lane / SH6 intersection upgrade (roundabout) is complete. NZTA would support the extension of the 50km/h zone north of the Bird Lane / SH6 intersection once the roundabout is installed.
OS165.14	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.6: Outline Spatial Plan - Wakefield North	Amend	Amend the following text in Outline Plan 16.3D.6, in line with the provisions included in PC81 for High Street Motueka (SH60): ***Development Requirements*** *Access and Transport* *• The internal road hierarchy of the Medium Density Residential Zone area must provide clear connections between State Highway 6 and Bird Road.* *• A Limited Access Frontage applies along much of Whitby Road to maintain safe and efficient traffic*	Provision is required for a suitable (NZTA approved) crossroads intersection along Whitby Rd, aligning with the indicative road on Outline Spatial Plan – Wakefield North, and shown in the image below where a Walking & Cycling link + emergency vehicle access have already been installed (red circle). PC81 will essentially extend the urban area of Wakefield to the north, therefore provision is required	Support with changes. Amend text in Schedule 16.3D.6 *Development Requirements* for an NZTA-approved crossroads intersection on Whitby Road, along with restrictions on existing accesses and securing a strip of MDRZ land as road reserve for future road widening.

			movement. Redevelopment of existing dwellings facing Whitby Road must provide rear access and remove direct vehicle crossings to Whitby Road wherever practicable. Add provision for a boundary adjustment of 144 Whitby Road (between 166 and 140 Whitby Road to allow for a 20m minimum road reserve to enable future road widening / footpaths / intersection upgrades including right turn bays at future cross-roads as shown on Outline Spatial Plan – Wakefield North.	for suitable urban active mode facilities to Wakefield amenities, and vehicle access should be funnelled to main intersections. Given the existing narrow width of Whitby Rd (SH6), restrictions on the existing Whitby Rd accesses and allowance for a strip of MDRZ land to be incorporated as state highway road reserve would enable future road widening and appropriate facilities to be installed. Refer to original submission for more information.	
OS165.15	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.6: Outline Spatial Plan - Wakefield North	Amend	Add provision of any required stormwater facilities prior to development of MDRZ under Schedule 16.3D.6 and Schedule 17.14A	This stretch of SH6 is known to flood frequently due to the low, flat contours. Development at this location would be dependent on stormwater / drainage improvements.	Support with changes. Require stormwater facilities prior to development of MDRZ to Schedule 16.3D.6
OS165.16	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Add provision of any required stormwater facilities prior to development of MDRZ under Schedule 16.3D.6 and Schedule 17.14A	This stretch of SH6 is known to flood frequently due to the low, flat contours. Development at this location would be dependent on stormwater / drainage improvements.	Support with changes. Require stormwater facilities prior to development of MDRZ to Schedule 17.14A
OS165.17	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	See NZTA Noise Overlay to be added in Appendix 3.	See NZTA Noise Overlay to be added in Appendix 3.	Support with changes. Add NZTA Noise Overlay as per appendix 3 of original submission. Refer to the original submission for more information.
OS165.18	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Amend wording as per below: ***Schedule 17.14A: Deferred Zone Locations table*** *Infrastructure or servicing that is required to be delivered (Rule 17.14.2.2 refers)* *Transport:* *White Road / SH6 intersection upgrade (roundabout)*	The ITA does not elaborate on this area in particular however NZTA support recommendation in the ITA to continue collaboration with NZTA relating to the Hope Bypass. SH6/White Rd has previously been discussed as being inadequate in its current form to support additional development, particularly if it becomes cross-roads with a new road on the north side of SH6. NZTA and TDC must consider a long-term/permanent solution for this location. Given the expected growth in this area, a roundabout at White Rd / SH6 intersection is likely to be the appropriate solution and this should be signalled in the PC81 provisions. Support Schedule 17.14A requiring intersection upgrade, however it needs to be clear that the White Road / SH6 intersection improvement would have to be approved by NZTA as Road Controlling Authority. Additional NZTA approval is	Support in part. Amend Schedule 17.14A Main Road Hope, Richmond, to include "roundabout" as the likely White Rd / SH6 intersection solution.

				required given this section of SH6 is a Limited Access Road under the Government Roading Powers Act 1989.	
OS165.19	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Amend	Include a mechanism that ensures there is no increased use of existing state highway accesses in this growth area, similar to 'Limited Access Frontage' provisions in place for High Street Motueka. This is also a requirement under the Limited Access Road provisions in the Government Roading Powers Act at this location. All access to new developments will be via the links shown as indicative roads. Add a mechanism to ensure than any new intersections / access to growth areas are approved by NZTA as Road Controlling Authority.	The ITA does not elaborate on this area in particular however NZTA support recommendation in the ITA to continue collaboration with NZTA relating to the Hope Bypass. SH6/White Rd has previously been discussed as being inadequate in its current form to support additional development, particularly if it becomes cross-roads with a new road on the north side of SH6. NZTA and TDC must consider a long-term/permanent solution for this location. Given the expected growth in this area, a roundabout at White Rd / SH6 intersection is likely to be the appropriate solution and this should be signalled in the PC81 provisions. Support Schedule 17.14A requiring intersection upgrade, however it needs to be clear that the White Road / SH6 intersection improvement would have to be approved by NZTA as Road Controlling Authority. Additional NZTA approval is required given this section of SH6 is a Limited Access Road under the Government Roading Powers Act 1989. Refer to original submission for more information.	Support in part. Amend so that a mechanism is included that there is no increased use of existing state highway accesses in this growth area and a mechanism to ensure than any new intersections / access to growth areas are approved by NZTA as Road Controlling Authority.
OS165.20	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.2: Outline Spatial Plan - 123 Salisbury Road	Amend	See NZTA Noise Overlay to be added in Appendix 3.	NZTA support the construction of a link road between Arbor-Lea Ave and Champion Rd prior to development occurring. Support recommendation in the ITA referring to ongoing collaboration with NZTA. Although the building restriction zone in the Outline Spatial Plan does not allow for any activities that may be affected by state highway noise, the standard NZTA noise overlay should still apply for consistency and to cover effects should the building restrictions change in the future.	Support with Changes. Add NZTA Noise Overlay to be added in Appendix 3. Refer to original submission for more information.

OS165.21	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.5: Outline Spatial Plan - Chertsey Road	Amend	See NZTA Noise Overlay to be added in Appendix 3. Once NZTA Noise Overlay is applied, there should be standard and consistent rules relating to reverse sensitivity.	Support excluding NZTA Hope Bypass designation from area available to development. Support provision of active mode link in the Outline Spatial Plan, ideally encouraging use of Eastern / Humes Drain connection to Great Taste Trail (GTT) rather than direction shared path users to SH60 where there is no on or off-road provision for active modes connecting to the GTT. Standard NZTA Noise Overlays and associated rules should apply.	Support with changes. Add NZTA Noise Overly as per Appendix 3 of the original submission. Also add standard and consistent rules relating to reverse sensitivity.
OS165.22	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Amend	Consistent with NZTA feedback to TDC (meeting notes distributed 27/05/2025), area T-178a needs to be deferred until Gladstone Rd (SH6) is a local road.	Intensive Development area to the northwest of Gladstone Rd should be dependent on this being a local road after the Hope Bypass is constructed. Although this is a suitable area for MDRZ given the location near amenities and public transport routes, significant increases in traffic generation from multiple SH6 accesses here are likely to impact on the safe and efficient operation of SH6.	Amend T-178a Zoning so that it is deferred Medium Density Residential Zone until Gladstone Rd(SH6) is a local road.
OS165.23	Proposed Plan Change No. 81 > Maps > Area Maps > 21 - Proposed PC81 - Area - Richmond, Gladstone Rd	Amend	See NZTA Noise Overlay to be added in Appendix 3.	Support inclusion of PC81 Road Traffic Noise Overlay	Support with changes. Add NZTA Noise Overlay as per Appendix 3 of the original submission. Refer to original submission for more information.
OS165.24	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	*Schedule 17.14A: Deferred Zone Locations table Infrastructure or servicing that is required to be delivered (Rule 17.14.2.2 refers).* *Transport:* *Construction of the Hope Bypass parallel to Gladstone Rd, so that Gladstone Rd is a local road rather than a state highway.*	Support ITA recommendation. Intensive Development area to the northwest of Gladstone Rd should be dependent on this being a local road after the Hope Bypass is constructed. Although this is a suitable area for MDRZ given the location near amenities and public transport routes, significant increases in traffic generation from multiple SH6 accesses here are likely to impact on the safe and efficient operation of SH6. Refer to original submission for more information.	Support in part. Amend wording in Schedule 17.14A to include T-178a and that the construction of the Hope Bypass parallel to Gladstone road is required to be delivered.
OS165.25	Proposed Plan Change No. 81 > Maps > Area Maps	Amend	Add NZTA Noise Overlay as per Appendix 3 of the original submission. Refer to original submission for more information.	There are no new accesses to SH6, and the zone change applying to Factory Rd is unlikely to result in change to traffic generation.	Support with changes. In Brightwater, Add NZTA Noise Overlay as per Appendix 3 of the original submission.
OS165.26	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Amend	See NZTA Noise Overlay to be added in Appendix 3.	Support indicative road layout.	Support with changes. Support indicative road layout, add NZTA Noise Overlay as per Appendix 3 in the original submission.

			Refer to original submission for more information.	NZTA Noise Overlay and associated reverse sensitivity rules should apply.	
OS165.27	Proposed Plan Change No. 81 > Maps > Area Maps	Amend	Now that Tasman District Council have an operational ePlan, it makes it easier to apply the same rules across zones where the NZTA Noise Overlay is in place (see Appendix 3 and associated Shapefiles). NZTA Noise Overlay to be used across all PC81 areas: The overlay shows those areas adjoining the state highway where noise modelling commissioned by NZTA indicates that road traffic noise needs to be managed to reduce adverse effects on human health and amenity; especially for sensitive land uses. The distance this overlay extends away from the state highway will vary. It depends on many factors; including traffic volumes, traffic speed, road surface material, natural or artificial screening and topography. While the extent of noise effects can extend further than 100 metres, the extent of the noise overlay has been capped at 100 metres to ensure that the most significant noise effects are addressed efficiently and effectively	Mapping of the Road Noise Overlay is inconsistent, with only parts of PC81 development areas adjacent to the state highway being covered. Approach to overlays should be consistent with National Planning Standards 2019: *An overlay spatially identifies distinctive values, risks or other factors which require management in a different manner from underlying zone provisions.* *If overlays are used their provisions must be located in the relevant Domain and Topic Chapters and sections.* Scope of Styles Group memo is restricted to MDRZ – NZTA's initial feedback sought provisions to manage reverse sensitivity for noise sensitive activities in all zones along the state highway subject to PC81. It would be more appropriate therefore to have a separate set of provisions which apply to road noise rather than within the zone chapters – this would address inconsistency issues raised above. Also it is unclear why it only applies to the MDRZ and not other new zones – could use overlay to just apply to new PC81 upzoned areas i.e. within the Road Noise Overlay.	Amend so that NZTA Noise Overlay is used across all PC81 sites.
OS165.28	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > H	Amend	Align meaning of words with National Planning Standards i.e. *Habitable Room - means any room used for the purposes of teaching or used as a living room, dining room, sitting room, bedroom, office or other room specified in the Plan to be a similarly occupied room*	NZTA support consistency across planning instruments. There is no reason to deviate from the national planning standard.	Amend meaning of words *Habitable Room* so that it is consistent with the National Planning Standard.
OS165.29	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Amend	Policy wording to be amended as per below, which is consistent with the Hope Bypass Designation and the Brightwater Development Area provisions. *To avoid, remedy or mitigate the reverse sensitivity effects ~~adverse effects of road noise~~ on the amenity of dwellings in the Medium Density Residential Zone.* Policies to include link to rule provisions related to reverse sensitivity effects.	PC81 proposes an inconsistent approach to managing road noise / reverse sensitivity effects compared to other provisions within the Plan. The approach to road noise associated with the Hope Bypass Designation (D127) and the Brightwater Development Area is clear that the measures are required to manage reverse sensitivity effects. In contrast the provisions requiring acoustic treatment within the Medium Density Zone for road noise are not related to reverse sensitivity effects. NZTA is only considering the effects of reverse sensitivity associated with noise from the state highway.	Support with changes. Amend Policy 5.2.3.8A so that reverse sensitivity effects are considered and the wording is consistent with the Hope Bypass Designation and the Brightwater Development Area provisions. Refer to original submission for more information.

				Policy 5.2.3.8A does not refer to reverse sensitivity and as written it is unclear where the responsibility lies for avoiding, remedying or mitigating the adverse effects of road noise. However, the provisions require acoustic treatment by landowners to manage reverse sensitivity effects. This approach is consistent with Policies 10 & 11 of the National Policy Statement for Infrastructure (NPS-I) Refer to policies 6.16.3.8 (in relation to Brightwater – policy is specific to Brightwater) and 7.3.3.17 (for rural residential development in coastal Tasman area). The section 32 evaluation is also unclear about the purpose of the provision, stating that "Policy 5.2.3.8 recognises the effects of traffic on safety, convenience and noise levels." Likewise in relation to Policy 6.16.1.7 the s32 refers to the need to manage road noise. However, NZTA considers the issue is not management of road noise but mitigating to manage reverse sensitivity and human health effects associated with road noise. 6.4A.3 Policies – no reference to mitigating road noise / reverse sensitivity – despite the provision. This means there is no policy consideration for a breach of the rule – there should be a policy. Could add to 6.4A.3.7 or have as a standalone policy	
OS165.30	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	Seek to remove this provision and replace it with a permitted activity reverse sensitivity rule (for individual buildings subject to the Noise Overlay) district wide, subject to the matter of control in the row below. (Submission point 165.31)	This rule is good in terms of covering reverse sensitivity effects, but not broad enough, as not all areas subject to the NZTA Noise Overlay are within Outline Spatial Plan areas.	Support with changes. Seek to remove this provision and replace it with a permitted activity reverse sensitivity rule (for individual buildings subject to the Noise Overlay) district wide, subject to the matter of control in the row below. (Submission point 165.31) Refer to the original submission for more information.
OS165.31	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Amend	Extend matter of control to cover all areas within PC81.	This is a good matter of control because it makes it clear the development has to mitigate effects. However, this only applies to subdivision within the MDRZ for a vacant allotment in an Outline Spatial Plan area.	Support with changes. Extend matter of control to cover all areas within PC81.

OS165.32	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	NZTA Noise Overlay and associated permitted activity rules should apply to those areas subject to reverse sensitivity effects as per Appendix 3, not just MDRZ. This matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ. Refer to original submission for more information.	This would not be required if the NZTA Noise Overlay and associated rules applied across all areas of PC81. 17.1A.3.1 – It may be counterproductive having no rule for road traffic overlay. People might choose to do standard density development but wouldn't then be required to consider road traffic noise – incentivising lower density developments.	NZTA Noise Overlay and associated permitted activity rules should apply to those areas subject to reverse sensitivity effects as per Appendix 3, not just MDRZ. This matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ. Refer to original submission for more information.
OS165.33	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	This matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ.	This should be a permitted activity rule, not a Restricted Discretionary rule. The rule as it stands would mean that applications are to be non-notified even where compliance with (t) isn't achieved and so there would be no opportunity for NZTA to input. Reference to Schedule is problematic as it restricts application of rule.	Support with changes. This should be a permitted activity rule, not a Restricted Discretionary rule. This matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ. Refer to original submission for more information.
OS165.34	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	*(37) Mitigation of indoor noise levels and the effects on human health and amenity values.* This matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ.	*(37) Mitigation of indoor noise levels and the effects on human health and amenity values* This should also refer to reverse sensitivity effects and it is not a very clear matter of discretion. Matter of control 24 for Rule 16.3.3A.2 is clearer – a similar matter would be preferable. The inconsistency leads to confusion. Matter of control 24 the extent to which the development mitigates adverse environmental effects, including the management of road traffic noise effects on future occupants of allotments in proximity to state highways, having regard to any acoustic design report provided and including effects on natural features……	To improve consistency and minimise confusion this matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ.
OS165.35	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Amend 17.1A.3.2 (p) as below. **Access** *(p) No additional vehicle crossings are created onto the following roads:*	Support the inclusion of Gladstone Rd (SH6) and High Street Motueka (SH60) in the list of roads where no additional vehicles crossings are created to support development. However, the provision is confusing as it applies to High Street Motueka which has a Limited Access Frontage in the Outline Spatial Plan, and there are other rules in place that state that	Amend 17.1A.3.2(p). To reduce confusion in relation to the High Street Motueka which has a limited Access Frontage in the Outline Spatial Plan and remove part of the provision.

			(i) Gladstone Road Richmond *(ii) Salisbury Road Richmond* *(iii) Champion Road Richmond* *(iv) Hill Street Richmond* *(v) Queen Street Richmond* *(vi) Wensley Road Richmond* *(vii) Higgs Road Māpua* *(viii) High Street Motueka* ~~*For the avoidance of doubt, this means that existing vehicle access crossings can continue to be used, and any new dwellings will either need to use the existing vehicle access crossing or a relocated vehicle access crossing. In the latter situation, the original vehicle access crossing would need to be disestablished.*~~ Note: For the avoidance of doubt, the rules in Section 16.2 continue to apply	any development must not use High Street Motueka for access.	
OS165.36	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.20 Principal Reasons for Rules	Amend	Include reference to the NZTA Noise Overlay and associated rules.	It would be helpful if there was mention of the road noise overlay to provide context and explanation.	Support with changes. Amend so that the NZTA Noise Overlay and associated rule and referenced.
OS165.37	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.13 Papakainga Zone Rules	Amend	This matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ. Include NZTA Noise Overlay as per Appendix 3 Refer to original submission for more information.	There are no road traffic noise overlay rules, but the effects of road noise on human health still need to be addressed. RDA notification is restricted to certain parties inc. NZTA if the development accesses the SH – so if there is no SH access proposed, then NZTA not be notified despite any noise concerns / effects	Since this development does not access the highway there are concerns over NZTA not being not being notified despite noise concerns/ effects. This matter is best covered in a PC81 district wide provision under the NZTA Noise Overlay– rule wording is to be confirmed in collaboration with NZTA, consistent with other district plans throughout NZ.
OS165.38	Proposed Plan Change No. 81 > Maps > Area Maps	Amend	Add NZTA Road Noise Overlay to T-150 Murchison, the site on Waller St (SH6).		Add NZTA Road Noise Overlay to T-150 Murchison, the site on SH6.

G P Investments LTD

Submitter 166

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS166.1	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words	Oppose	**Delete** the following text from the definition for Comprehensive Development: "…~~or two or more dwellings on one site in the~~	The submitter states that the comprehensive development provisions are overly onerous and unnecessary for a two-	Oppose the amendments to the definition for Comprehensive development. Namely the addition of the following text: "… or two or more

			~~Medium Density Residential Zone, regardless of whether there are one or more existing dwellings already on the site~~." And make a consequential amendment to Rule 17.1A.3.2 to remove reference to two or more new dwellings. See full submission for detail	unit development and should continue to apply to developments of three or more units.	dwellings on one site in the Medium Density Residential Zone, regardless of whether there are one or more existing dwellings already on the site."
OS166.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.6 Land for Commercial Activities	Support	Retain Objective 6.6.2.3 and Policy 6.6.3.1 as drafted.	The submitter states the provisions are consistent with the changes to the TRPS and the intention of Plan Change 81 to ensure sufficient and well-located business land to support economic growth and employment.	Supports Objective 6.6.2.3 and Policy 6.6.3.1 relating to the supply of suitably located commercial land.
OS166.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.6 Land for Commercial Activities	Support	Retain Objective 6.6.2.4 and Policy 6.6.3.3 as drafted. See full submission for detail.	The submitter states the provisions are consistent with the changes to the TRPS and the intention of Plan Change 81 to ensure sufficient and well-located business land to support economic growth and employment.	Supports Objective 6.6.2.4 and Policy 6.6.3.3 establishing a hierarchy for commercial centres within the district.
OS166.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	Retain Policy 6.4A.3.11 and amend it so that Schedule 16.3D.4 requires a minimum density of 30 dwellings per hectare rather than 40 dwellings per hectare. Amend as follows: b) require, using the net area of the site, an overall minimum density of: (i) … (ii) 40 dwellings per hectare in the Richmond Intensive Development Precinct, <u>except for Schedule 16.3D.4 which is 30 dwellings per hectare;</u>	The submitter seeks a minimum density of 30 dwellings per hectare for Schedule 16.3D.4 and states that a density of 40 dwellings per hectare is very high and prescriptive.	Support Policy 6.4A.3.11 for Medium Density Residential Zoning of locations that are subject to an Outline Spatial Plan, with the added amendment of providing for an overall minimum density of 30 dwellings for the submitter's land.
OS166.5	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic)	Oppose	Delete Rule 16.2.2.3(l) Cycle Parking Design, Rule 16.2.2.3(m) End of Trip Facilities, and Rule 16.2.2.3(q) Electric Vehicle Supply Equipment.	The submitter states these transport standards are overly onerous, unnecessarily detailed, limit development flexibility, may trigger additional consent requirements and costs, and are better managed through market demand.	Oppose the addition of rules relating to the design and location of cycle parking, provision of end of trip facilities and provision for electric vehicle supply equipment as set out under Rules 16.2.2.3 (l) and (m) and (q).
OS166.6	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.4: Outline Spatial Plan - Berryfield Crossing	Amend	Retain Schedule 16.3D.4 and amend it by: • Removing the Proposed Road Indicative Alignment and Secondary Access Indicative Alignment from the Outline Spatial Plan map; and • Removing the sentence from "Context": "~~High residential densities can be achieved due to proximity to the commercial centre, public transport, and active transport networks.~~"	The submitter states future development options for the site remain under consideration through resource consent processes and that the indicative road layout may affect development options, add unnecessary complications and become out of date. The submitter considers the access and transport requirements within the Outline Spatial Plan are sufficient to achieve the desired outcomes.	Support the introduction of the Outline Spatial Plan for the subject land, being Schedule 16.3D.4, with the addition of removing the 'Proposed Road Indicative Alignment' and 'Secondary Access Indicative Alignment", and removing the contextual sentence relating to high residential densities.

OS166.7	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Amend	Amend condition (f) by adding Every road is through connect, unless it is a cul-de-sac of: (i) 80 metres or less, or (ii) 160 metres or less in Outline Spatial Plan 16.3D.4.	The submitter seeks flexibility for future roading and traffic outcomes while current and prospective resource consent applications are being progressed. Council retains control over the adequate provision of roads pursuant to matter of control (3) and (28)	Support the introduction of a controlled activity pathway for subdivision within an Outline Spatial Plan, with the added addition of enabling a longer cul-de-sac roading solution for the land in Schedule 16.3D.4.
OS166.8	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Amend the activity status for comprehensive developments located within an Outline Spatial Plan Area and meeting the conditions of Rule 17.1A.3.2 from Restricted Discretionary Activity to Controlled Activity.	The submitter considers the change would be consistent with subdivision provisions applying to the same activity and provide greater certainty to developers.	Oppose the restricted discretionary activity status for comprehensive developments within an Outline Spatial Plan Area which meets the conditions set out under 17.1A.3.2.
OS166.9	Proposed Plan Change No. 81 > Maps > Zone Maps > 52 - Proposed PC81 - Zone - Richmond, Lower Queen St	Support	Retain Update Zone Map 80-52 as drafted in relation to the Medium Density Residential rezoning of 405 Lower Queen Street. See full submission for detail.	The submitter states the rezoning would provide for a variety of housing needs, contribute to housing supply and growth targets, enable efficient use of land, be consistent with surrounding residential development, support a coherent urban form, and align with the Future Development Strategy and National Policy Statement on Urban Development.	Support rezoning of 405 Lower Queen Street from Mixed Business Zone to Medium Density Residential Zone.
OS166.10	Proposed Plan Change No. 81 > Maps > Zone Maps > 52 - Proposed PC81 - Zone - Richmond, Lower Queen St	Support	Retain update map 80-52 as drafted in relation to the submitter's property at Lower Queen Street where it is to be zoned Richmond Intensive Development Precinct.	The submitter states the precinct provides greater opportunity for housing variety and housing supply, supports district growth targets, enables efficient use of land, and aligns with the Future Development Strategy and National Policy Statement on Urban Development.	Support the addition of the Richmond Intensive Development Precinct to 405 Lower Queen Street where it is proposed to be rezoned Medium Density Residential Zone.
OS166.11	Proposed Plan Change No. 81 > Maps > Area Maps > 22 - Proposed PC81 - Area - Richmond, Lower Queen St	Oppose	Delete the Road Traffic Noise Overlay from 405 Lower Queen Street, Richmond on Update Area Map 80-22. See full submission for detail.	The submitter states the overlay is unnecessarily onerous and inconsistent with requirements applying to surrounding residential areas located on the same traffic corridor.	Oppose the inclusion of the Road Traffic Noise overlay on the property at 405 Lower Queen Street, Richmond.
OS166.12	Proposed Plan Change No. 81 > Maps > Area Maps > 22 - Proposed PC81 - Area - Richmond, Lower Queen St	Support	Retain Update Area Map 80-22 as drafted in relation to the removal of the Retail Frontage Overlay from 405 Lower Queen Street. See full submission for detail.	The submitter states the Retail Frontage Overlay is unnecessary, inappropriate and ineffective in this location.	Support the deletion of the Retail Frontage overlay along the frontage of the property at 405 Lower Queen Street, Richmond.
OS166.13	Proposed Plan Change No. 81 > Maps > Zone Maps > 52 - Proposed PC81 - Zone - Richmond, Lower Queen St	Support	Retain update map 80-52 as drafted in relation to the submitter's property at Lower Queen Street where it is to be rezoned Commercial.	i) existing uses of site and area include commercial activities. The proposed zoning would be consistent with the existing character and amenity of the area; ii)the zoning allows for the establishment of local commercial activities, complementing and supporting nearby existing residential areas and contributing to reduced travel demand; iii) the subject land is also well situated to support the servicing and retail needs of the expanding residential population west of Richmond; iv) the zoning supports the economic well-being, including employment needs, of the community; v) the commercial viability of the existing Berryfields Crossing development relies on further commercial development of a portion of the remainder of the subject land. The site was purchased and development was invested on this premise; vi) there is limited land of this size available within the District which is suitable for, or able to be used for, a	Support rezoning of 405 Lower Queen Street from Mixed Business Zone to Commercial zone.

				comprehensively planned commercial development. A rezoning will provide for the efficient use of resources; vii) commercial development of the subject land is either actively underway or provided for by approved resource consents; and viii) the proposed zoning is consistent with the Future Development Strategy and the National Policy Statement for Urban Development.	
OS166.14	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Oppose	Retain Rules 17.1A.3.2(b) and 16.3.3A.2(b)as drafted. Amend Schedule 16.3D.4 for Berryfield Crossing by adding the following under Development Requirements: Minimum Density The development achieves a minimum density of 30 dwellings per hectare.	40 dwellings/hectare is very high and prescriptive.	Oppose the requirement for a minimum density of 40 dwellings per hectare for the subject land (as it is proposed to be within the Richmond Intensive Development Precinct).

Kairos Trust

Submitter 167

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS167.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 49 - Proposed PC81 - Zone - Richmond, Cnr Champion Rd - Eyles Rd	Amend	Supports the rezoning of site T-114a (Eyles Road) from Rural 2 Zone to Rural Residential Zone provided commercial zoning, visitor accommodation, and reverse sensitivity relief sought elsewhere in the submission is provided. Refer to original submission for more information.	Supports the rezoning of site T-114a (Eyles Road) from Rural 2 Zone to Rural Residential Zone provided commercial zoning, visitor accommodation, and reverse sensitivity relief sought elsewhere in the submission is provided. Refer to original submission for more information.	Supports the rezoning of site T-114a (Eyles Road) from Rural 2 Zone to Rural Residential Zone provided commercial zoning, visitor accommodation, and reverse sensitivity relief sought in their submission is provided for land owned by the submitter at Lot 2 DP 546895, Lot 3 DP 547929, Part Section 83 SQ 1 and Lot 1 DP 546895. If relief is not provided, the submitter seeks that the rezoning of T- 114a be declined, or its extent reduced so as to exclude land adjoining the submitter's boundary, on the grounds set out in their submission.
OS167.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 49 - Proposed PC81 - Zone - Richmond, Cnr Champion Rd - Eyles Rd	Amend	AMEND the PC81 planning maps to rezone the submitter's land at Lot 2 DP 546895, Lot 3 DP 547929, Part Section 83 SQ 1 and Lot 1 DP 546895 from Rural 2 Zone to Rural Residential Zone, consistent with the treatment of adjoining site T-114a. Refer to original submission for more information.	The submitter states that the land was not assessed as part of PC81, adjoins site T-114a, shares similar characteristics with surrounding land, is no longer used for productive rural purposes, and is suited to low-density residential development. Refer to original submission for more information.	The submitter seeks rezoning of the Silvan Forest land (218 Champion Road / Silvan Place, Richmond (Lot 2 DP 546895, Lot 3 DP 547929, Part Section 83 SQ 1, Lot 1 DP 546895) from Rural 2 Zone to Rural Residential Zone.
OS167.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 49 - Proposed PC81 - Zone -	Amend	Amend the PC81 planning maps to apply a Commercial Zone (or such other zone as provides equivalently for commercial and hospitality activity) over the Silvan Steps	The submitter states that commercial activities at Silvan Steps are already established and consented, including a coffee cart and events.	The submitter seeks a Commercial Zone, or equivalent zoning, over the Silvan Steps precinct to provide for commercial and hospitality activities.

	Richmond, Cnr Champion Rd - Eyles Rd		precinct, of sufficient extent to accommodate the facility shown in the submitter's concept design, together with associated parking, access and servicing. Refer to original submission for more information.	The Rural 2 Zone does not specifically provide for these activities and requires ongoing resource consent processes. Refer to original submission for more information.	
OS167.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 49 - Proposed PC81 - Zone - Richmond, Cnr Champion Rd - Eyles Rd	Amend	Amend the provisions applying to the submitter's land (Lot 2 DP 546895, Lot 3 DP 547929, Part Section 83 SQ 1 and Lot 1 DP 546895) so that visitor accommodation and short-term residential stays are expressly enabled alongside residential activity across the wider landholding, whether through the zone provisions, a precinct, or an Outline Spatial Plan applying to the land. Refer to original submission for more information.	The submitter seeks a mix of residential activity, visitor accommodation, and short-term stays as part of a low-density development approach integrated with the existing forest and recreation activities. Refer to original submission for more information.	The submitter seeks provisions enabling visitor accommodation and short-term residential stays across the wider landholding at Lot 2 DP 546895, Lot 3 DP 547929, Part Section 83 SQ 1 and Lot 1 DP 546895.
OS167.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules > 17.8.3 Building Construction, Alteration, or Use	Amend	Insert provisions requiring that new dwellings and other noise sensitive activities established within site T-114a, and within any other land rezoned in the vicinity of Silvan Forest, incorporate acoustic design and treatment sufficient to achieve appropriate internal noise levels having regard to the submitter's consented activities. Refer to original submission for more information.	The submitter states that existing consented commercial and event activities at Silvan Forest could be affected by residential intensification on adjoining land and seeks protection for those activities. Refer to original submission for more information.	The submitter seeks the inclusion of provisions requiring that new dwellings and other noise sensitive activities established within site T-114a, and within any other land rezoned in the vicinity of Silvan Forest, incorporate acoustic design and treatment sufficient to achieve appropriate internal noise levels having regard to the submitter's consented activities.
OS167.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.8 Rural Residential Zone Rules > 17.8.2 Land Use	Amend	Insert provisions requiring a no-complaints covenant, or equivalent mechanism, to be registered against the titles of new residential allotments within the area affected by noise from the submitter's consented activities, acknowledging the established and lawfully consented commercial and event activity at Silvan Forest. Refer to the original submission for more information.	The submitter states that existing consented commercial and event activities at Silvan Forest should be recognised and protected from potential reverse sensitivity effects associated with future residential development. Refer to the original submission for more information.	The submitter seeks the insertion of provisions requiring a no-complaints covenant, or equivalent mechanism, to be registered against the titles of new residential allotments within the area affected by noise from the submitter's consented activities, acknowledging the established and lawfully consented commercial and event activity at Silvan Forest.
OS167.7	Proposed Plan Change No. 81	Amend	Amend the objectives, policies, rules, planning maps and any Outline Spatial Plan provisions of the TRMP to the extent necessary to give effect to the submitters request to give effect to this submission or to address the concerns raised in it. Refer to original submission for more information.	The submitter seeks amendments necessary to implement the outcomes requested elsewhere in the submission.	The submitter seeks consequential amendments to planning provisions and maps to give effect to the relief sought in the submission.

Bill and Erica Lynch

Submitter 168

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS168.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Support	Retain Residential rezoning with provision for both Medium and Mixed Density development.	The land is peri-urban, no longer viable for orcharding, and capable of supporting a diverse residential community.	The submitters support rezoning their 19.3 ha landholding (75-81 Seaton Valley Rd) from Rural Residential to Residential, enabling both Medium Density and Standard/Mixed Density development. They consider the site well-located, no longer productive, and suitable for a range of housing typologies integrated with natural features (lake, gullies, waterways).
OS168.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Oppose	Remove deferred zoning from their land.	Deferral is unnecessary, duplicates existing TRMP upgrade requirements, and risks cancelling zoning after long delays.	They oppose the deferred status applied to their land, stating it creates unnecessary delay and uncertainty. They consider road-upgrade triggers already addressed through existing subdivision rules and do not justify deferral until 2034 or beyond.
OS168.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Oppose	Clarify zoning terminology and ensure Mixed/Standard Density areas function as intended.	Clear zoning is needed to avoid inconsistent activity statuses.	The Zone Map labels the entire site Medium Density, while the Outline Spatial Plan shows Mixed Density and Standard Density areas. They seek assurance that these differences will not create consenting complications.
OS168.4	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words	Oppose	Amend net-density definition to exclude all listed non-usable areas.	Net density should reflect actual developable land, not areas required for open space or environmental protection.	They oppose the current net-density definition and seek exclusions for reserves, walkways, open space, ponds/lakes, stormwater areas, hazard-constrained land, ecological/riparian setbacks, and community/commercial facility areas.
OS168.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Make both subdivision and land-use consents controlled activities.	Consistency provides certainty and efficient consenting for comprehensive development.	Subdivision in Medium Density areas is controlled, but land-use consent is restricted discretionary. They consider this inconsistent and unnecessarily complex.
OS168.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Allow 11 m height where buildings do not exceed adjoining land height; retain 8 m elsewhere.	Site topography enables taller buildings without external effects.	They oppose the 8 m height limit for Mapua, seeking up to 11 m (3 storeys) where topography contains effects internally and buildings sit below surrounding land.
OS168.7	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Review and simplify Medium Density rules; remove unnecessary internal-design regulation.	Rules should focus on external effects and provide certainty for intensification.	They oppose the detailed design matrix and scoring system, stating it is overly complex, risks unnecessary notification, and is inconsistent with the direction of resource-management reform.
OS168.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	Enable shared office/community facilities within the Medium Density zone.	Mixed-use elements support modern living, reduce travel, and strengthen community cohesion.	They seek explicit provision for shared office facilities, small community spaces, and mixed-use elements within their development (e.g., remote-working spaces, meeting rooms, small gym/café).

Wakatū Inc

Submitter 169

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS169.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Amend	Retain Chapter 10A Papakāinga Development but redraft relevant parts of the chapter to correctly reflect Wakatū, the land it holds, and what and who it represents, including references relating to tāngata whenua and papakāinga development.	The submitter considers there are inconsistencies in the drafting of Chapter 10A that may misconstrue its interpretation. The submitter states that references to tāngata whenua fail to recognise the status of Wakatū, its land, and its historical and cultural connection to that land. The submitter is concerned that provisions such as Example 10A.3.1 imply that only tāngata whenua can lead papakāinga development and that wording in Chapter 10A.30 incorrectly suggests Wakatū represents tāngata whenua. The submitter also considers the term tāngata whenua may be misconstrued where ancestral land is owned by another party.	The submitter supports the inclusion and intent of Chapter 10A Papakāinga Development but considers parts of the chapter do not appropriately recognise Wakatū, its landholdings, and its historical and cultural relationship with ancestral land. The submitter seeks amendments to Chapter 10A to address references to tāngata whenua that may be misconstrued.

Mahau Properties Nominees Ltd

Submitter 170

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS170.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Oppose	Rezone 52, 54 and 54A Gladstone Road to Medium Density Residential and include them in the Richmond Intensive Development Precinct.	The sites are better suited to residential intensification, are well-located near the town centre and Jubilee Park, and align with PC81's housing supply objectives.	The submitter opposes rezoning their three Gladstone Road properties to Mixed Business. They consider the sites too small, fragmented, and constrained to deliver the intended business-zone outcomes. They note that earlier intentions for a combined business redevelopment are no longer relevant because adjoining Poutama Street land has been sold. They now seek Medium Density Residential zoning and inclusion in the Richmond Intensive Development Precinct, consistent with adjoining residential intensification and Richmond Spatial Plan direction. The three sites cannot accommodate such development due to lot size, setbacks, surrounding residential context, and fragmented ownership. Rezoning would create isolated business land unable to fulfil the zone's purpose. Residential intensification is more suitable and strategic.
OS170.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Review and amend MDRZ subdivision and land-use rules to ensure internal consistency, reduce unnecessary complexity, and align with reform direction.	Clear, efficient rules are needed to support intensification and avoid uncertainty.	They identify inconsistencies between subdivision (controlled) and land-use (restricted discretionary or non-complying) activity statuses. They also note that some design-matrix provisions regulate internal site design and may conflict with emerging resource-management reform.

Kainga Ora - Homes and Communities

Submitter 171

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS171.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 38 - Proposed PC81 - Zone - Motueka Central	Support	Retain the rezoning of T-190C Motueka West Greenfield Intensification Area from Residential Zone to Medium Density Residential Zone as notified.	Kāinga Ora supports the rezoning because it will provide additional housing capacity and support medium density residential development in a location identified for urban growth. Kāinga Ora supports the Medium Density Residential Zone as a means of enabling a wider range of housing choices and increasing development capacity within the urban area	Support the rezoning of T-190C Motueka West Greenfield Intensification Area (Whakarewa Street) from Residential Zone to Medium Density Residential Zone.
OS171.2	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words	Amend	Amend the definition of *Comprehensive Residential Development* so that it reads: "Comprehensive development means a comprehensively planned and designed collection of three or more dwellings on one site in the Residential Zone, or ~~two~~ four or more dwellings on one site in the Medium Density Residential Zone, regardless of whether there are one or more existing dwellings already on the site."	Kāinga Ora supports the definition in principle but considers that, consistent with the wider relief sought through the submission, developments of up to three dwellings within the Medium Density Residential Zone should be enabled without being classified as comprehensive residential development. The submitter considers the current two-dwelling threshold unnecessarily constrains housing delivery and medium density development opportunities.	Support the proposed definition of *Comprehensive Residential Development* but seek amendments so that, within the Medium Density Residential Zone, comprehensive residential development applies only to developments of four or more dwellings rather than two or more dwellings. Kāinga Ora considers this change is necessary to support a more enabling medium density residential development framework.
OS171.3	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective	Support	Retain Objective 5.2.2 as notified.	Kāinga Ora supports the additions to Objective 5.2.2 because they recognise that urban character and amenity values will evolve over time as residential intensification occurs and additional housing capacity is provided. The submitter considers this approach is consistent with the National Policy Statement on Urban Development and supports the delivery of a well-functioning urban environment.	Support the proposed amendments to Objective 5.2.2 recognising that amenity values may develop and change over time in areas identified for residential intensification and urban growth.
OS171.4	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Support	Retain Policies 5.2.3.1, 5.2.3.2 and 5.2.3.3 as notified.	Kāinga Ora supports the proposed additions to these policies because they align with the National Policy Statement on Urban Development and appropriately recognise that urban environments evolve as housing intensification occurs. The submitter considers the amendments support the delivery of a well-functioning urban environment and provide an appropriate policy response to anticipated changes in amenity and character resulting from growth and development.	Support Policies 5.2.3.1, 5.2.3.2 and 5.2.3.3 relating to privacy, residential amenity and urban character. Kāinga Ora supports the amendments recognising that amenity values and neighbourhood character will develop and change over time as residential intensification occurs and additional housing capacity is provided.
OS171.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.3 Visual and	Oppose	Delete Policy 5.3.3.1.	Kāinga Ora considers the policy does not achieve its intended purpose and does not appropriately recognise that residential character can change over time as a result of urban growth and intensification. Kāinga Ora notes that Medium Density Residential Zones may also exhibit medium density residential character and considers that requiring existing residential	Oppose in part Policy 5.3.3.1 relating to maintaining low or medium density residential character within existing urban areas. Kāinga Ora considers the

	Aesthetic Character > 5.3.3 Policies			character to be maintained is inconsistent with the National Policy Statement on Urban Development and the anticipated outcomes of intensification within urban environments.	policy is inconsistent with the intent of the National Policy Statement on Urban Development because it seeks to maintain existing residential character despite planned urban intensification and growth.
OS171.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Retain Policies 6.3.3.1A and 6.3.3.1B as notified.	Kāinga Ora supports these policies because they provide flexibility in terms of the location of development and recognise that additional residential capacity can be enabled through a range of infrastructure delivery mechanisms. Kāinga Ora considers the policies appropriately support the identification of land suitable for residential development and acknowledge that infrastructure capable of meeting growth objectives may be provided through developer-led or alternative solutions where necessary.	Support Policies 6.3.3.1A and 6.3.3.1B relating to residential intensification, infrastructure provision and the identification of land appropriate for residential development. Kāinga Ora supports these policies because they provide flexibility in relation to the location and timing of development and recognise that developer-led or temporary infrastructure solutions may be required to achieve sufficient residential development capacity.
OS171.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Amend Policy 6.3.3.1C so that the definition of "appropriate standard" recognises developer-led solutions in addition to the Nelson Tasman Land Development Manual. Specifically amend the policy to state: "For the purposes of this policy 'appropriate standard' refers to, but is not limited to, the Nelson Tasman Land Development Manual and also developer led solutions."	Kāinga Ora supports the policy but is concerned that it is inconsistent with Policy 6.3.3.1A, which recognises that residential intensification may require developer-led or temporary infrastructure solutions. Kāinga Ora considers Policy 6.3.3.1C should expressly recognise those solutions to provide greater flexibility in delivering housing capacity and to avoid unnecessarily constraining development where infrastructure outcomes can be achieved through alternative delivery mechanisms.	Support Policy 6.3.3.1C in part but seek amendments to better align the policy with Policy 6.3.3.1A. Kāinga Ora supports the intent of ensuring that development is appropriately serviced by infrastructure but considers the policy should also recognise developer-led and temporary infrastructure solutions that can facilitate residential development and housing capacity.
OS171.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Amend	Amend objective 6.4A.2.2 as follows: A well-functioning urban environment through intensification that provides a variety of housing types and sizes – close to centres and within identified areas – that responds to: (a) current and future housing needs and demand; and ~~(b) the desirability of market-driven variation in land prices; and~~ (c) the town's planned urban built character; and promotes and incorporates density ~~and urban design~~ and amenity outcomes appropriate to a more intensive urban environment.	Kāinga Ora supports the intent of the objective but considers clause (b) should be deleted because it could lead to less intensive development occurring in otherwise suitable locations due to the market popularity of standalone dwellings. Kāinga Ora also seeks amendments to ensure the objective remains effective over the life of the plan by recognising both current and future housing needs and by avoiding unnecessary restrictions on intensification. Kāinga Ora considers the objective should provide a more enduring and enabling framework for residential intensification and housing delivery.	Support Objective 6.4A.2.2 in part but seek amendments to ensure it better supports residential intensification and long-term housing delivery. Kāinga Ora supports the intent of providing a well-functioning urban environment through intensification and a variety of housing types and sizes but considers some components of the objective are unnecessarily restrictive and inconsistent with

					market demand and the long-term operation of the plan.
OS171.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	Amend Policy 6.4A.3.6 as follows: ~~To enable up to two dwellings on a site within the Medium Density Residential Zone as a permitted and appropriate use of land, contributing to housing capacity and the use and development of sites, while ensuring that such development does not compromise the efficient and integrated development of land for more comprehensive forms of medium density development~~ To enable residential development within the Medium Density Residential Zone that contributes to housing capacity and the efficient use of urban land, while ensuring development does not compromise the integrated and efficient use of sites for more comprehensive medium-density development.	Kāinga Ora supports the intent of the policy but considers the wording is unnecessarily lengthy and prescriptive. Kāinga Ora considers references to "up to two dwellings" are rule-based matters that are more appropriately addressed through development controls rather than policy direction	Support Policy 6.4A.3.6 in part but seek amendments to remove unnecessary prescription and better focus the policy on enabling residential development and housing capacity within the Medium Density Residential Zone. ☐image☐turn93search26†image.png ☐(Image: Policy 6.4A.3.6 row)
OS171.10	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	Amend Policy 6.4A.3.5 as follows: ~~To enable the range of land uses and activities anticipated within the Residential Zone within the Medium Density Residential Zone, recognising that the Medium Density Residential Zone provides for a similar pattern of activities while enabling greater intensity of built form.~~ To enable a range of land uses and activities within the Medium Density Residential Zone, recognising that it provides for a similar pattern of activities to the Residential Zone while enabling a greater intensity of development.	Kāinga Ora supports the intent of this policy but seeks that it is refined to improve clarity.	Kāinga Ora supports the intent of Policy 6.4A.3.5 but seeks that it is refined to improve clarity.
OS171.11	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	Policy 6.4A.3.7 To enable medium density development in locations where it contributes to a well-functioning urban environment, including where land can be used efficiently, accessibility supports intensification, and the location is able to accommodate growth and change in urban form and amenity, recognising that: (a) housing intensification requires successful ~~urban design and~~ amenity outcomes appropriate to a more intensive urban environment; (b) ~~successful urban design outcomes result from the interaction of multiple site variables and that~~ a range of design responses may be appropriate; and (c) such outcomes cannot be achieved through prescriptive development standards alone; by: (d) enabling development that achieves successful ~~urban design~~ and amenity outcomes; (e) managing the design, location and bulk of development adjoining neighbouring sites to integrate new housing within the neighbourhood and its immediate environment whilst ensuring that the development meets the planned character of that neighbourhood;	Whilst Kāinga Ora support most of the policy and its intend, Kāinga Ora is concerned that too much emphasis is placed on urban design measures which could lead to design rework within the consenting phase due to conflicting urban design ideas.	Changes to Policy 6.4A.3.7 to reduce focus on urban design

OS171.12	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	Amend Policy 6.4A.3.8 as follows: To enable medium density residential development within the Medium Density Residential Zone ~~through two distinct approaches that respond to the scale and context of development, by:~~ ~~(a)~~ Applying a structured, spatial planning approach to larger or undeveloped sites through the use of Outline Spatial Plans, to coordinate the location, layout, density and form of development, and ensure the integrated and efficient development of land and infrastructure~~; and~~ ~~Using a Medium Density Residential~~ ~~Design Matrix to achieve good standards of urban design through allocation of points via a scoring system~~ ~~that identifies multiple ways a development can achieve those good~~ ~~standards of urban design. And recognising that the achievement of~~ ~~acceptable urban design and amenity~~ ~~outcomes cannot be assured through prescriptive standards alone, due to the~~ ~~interaction of multiple design elements~~ ~~and the variability of site-specific circumstances.~~	Kāinga Ora opposes the Medium Density Residential Design Matrix and seeks that it be removed in its entirety. The matrix relies on a rudimentary scoring framework that oversimplifies design assessment and does not provide for a balanced consideration of the overall quality and performance of a development. Its "tick-box" nature risks prioritising compliance with individual criteria over achieving high-quality urban design outcomes, while also constraining flexibility and innovation in design responses.	Submitter seeks to amend Policy 6.4A.3.8 to enable medium density housing via two methods: Outline Spatial Plans for larger sites and a Design Matrix to ensure good urban design through a points system. Kāinga Ora opposes the Design Matrix, arguing it oversimplifies design assessment, prioritizes checklist compliance over quality, and limits design flexibility and innovation. They request its full removal.
OS171.13	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	Rewrite Policy 6.4A.3.9 as follows: Enable interim development where it can demonstrate that future integrated development remains feasible and that key transport, infrastructure and connectivity outcomes are not materially prejudiced.	Kāinga Ora opposes this policy in part because it may unnecessarily constrain legitimate interim development and create uncertainty for landowners. The requirement to "maintain and maximise" future comprehensive development potential sets an overly restrictive threshold, while the phrase "may compromise" is subjective and could result in otherwise appropriate development being prevented. This may lead to under-utilisation of residentially zoned land and delay housing delivery. Kāinga Ora seeks that the policy be amended to enable interim development provided it does not unreasonably prejudice the efficient future development of the site in accordance with any approved Outline Spatial Plan.	The submitter, Kāinga Ora, requests amending Policy 6.4A.3.9 to allow interim development if future integrated development remains feasible and key outcomes are not materially harmed. They oppose the current policy for being too restrictive and subjective, potentially preventing suitable development and delaying housing. They want the policy changed to permit interim development that does not unreasonably hinder efficient future development per approved plans.
OS171.14	Proposed Plan Change No. 81 > Chapter 6:	Amend	(b) Manage subdivision to ensure that it does not materially compromise the	Kāinga Ora supports the intended density outcomes for the Medium Density Residential Zone but opposes the use of the	Submitter seeks to amend subdivision rules to allow flexibility while ensuring future comprehensive

	Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies		achievement of future comprehensive development and the minimum densities in (a) above, including by: (i) requiring subdivision on sites less than 5,000m² to be preceded by, or undertaken in conjunction with, land use consents that identify the built form of the development; and (ii) ensuring subdivision on sites greater than 5,000m² maintains the ability for future comprehensive development; and (iii) enabling subdivision where it can be demonstrated that the intended density and development outcomes of the zone can still be achieved.	term "avoid" in Policy (b). In planning terms, "avoid" is generally interpreted as a strong directive to prohibit a certain use. As drafted, the policy may unnecessarily constrain otherwise appropriate subdivision proposals, including staged development and subdivision that can still support the achievement of future comprehensive development and intended dens ity outcomes	development and minimum densities are met. They propose requiring land use consent before subdividing sites under 5,000m², maintaining development potential on larger sites, and enabling subdivision if density outcomes are achievable. Kāinga Ora supports the density goals but opposes the term "avoid," as it may unduly restrict suitable subdivision and staged development.
OS171.15	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Delete the Design Matrix and provide for any consequential changes	Kāinga Ora opposes the Design Matrix as noted above.	**Summary of Submission:** The submitter opposes the proposal. They seek deletion of the Design Matrix. They request any related changes be made accordingly. The opposition is specifically from Kāinga Ora.
OS171.16	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Oppose	Delete the provision in its entirety	Kāinga Ora opposes the requirement to include provision for the charging of electric vehicles as this imposes additional construction and infrastructure costs on homeowners and developers, particularly where the charging infrastructure may not be utilised. The requirement reduces flexibility for homeowners to determine when and if such infrastructure is needed and may adversely affect housing affordability.	**Summary of Submission:** The submitter opposes the proposal and seeks its complete deletion. They argue that requiring electric vehicle charging infrastructure increases building costs for homeowners and developers. Concerns include potential underuse of the infrastructure and reduced homeowner flexibility. They believe this requirement could negatively impact housing affordability.
OS171.17	Proposed Plan Change No. 81 > Chapter 16: General Rules >	Support	Retain the provision as notified	Kāinga Ora supports this rule – in particular that such subdivision is a controlled activity.	**Submitter's Position:** Support

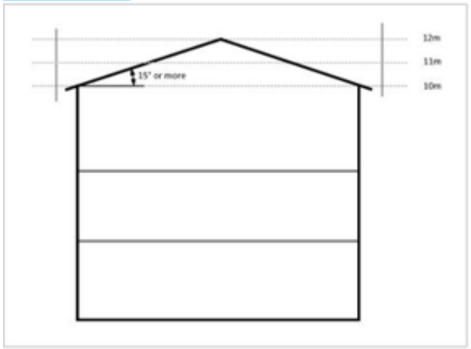
	16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.1 Controlled Subdivision - Medium Density Residential Zone - Land Use Led				**Decision Sought:** Retain the provision as notified **Reason:** Kāinga Ora supports the rule, especially that the subdivision is classified as a controlled activity.
OS171.18	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.1 Controlled Subdivision - Medium Density Residential Zone - Land Use Led	Oppose	(4) Consistency with the Urban Design Guide (Part II, Appendix 2). Delete the Urban Design Guide from within the District Plan with all consequential changes required. Alternatively, should its removal fall outside the scope of this plan change, Kāinga Ora seeks an amendment to ensure that development within the MDRZ is not required to be assessed against the Guide	Kāinga Ora opposes incorporating the urban design guide within the District Plan as a statutory document. In practice, the incorporation of design guidance within a District Plan creates an additional de facto set of rigid rules and standards to be complied with, which often fail to recognise or allow for flexibility and innovation in design in achieving quality planning outcomes.	**Summary of Submission:** Kāinga Ora seeks removal of the Urban Design Guide from the District Plan. They argue its inclusion creates rigid rules that limit design flexibility and innovation. If removal is out of scope, they request amendments to avoid requiring MDRZ development to be assessed against the Guide.
OS171.19	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities	Amend	Amend Rule 17.1A.3.1 (a) as follows: Maximum Dwellings per Site (a) ~~There are no more than two~~ Up to three dwellings per site and either: ~~(i) The two dwellings are physically joined and are part of the same structure; or~~ ~~At least one of the dwellings is a minor dwelling.~~	Kāinga Ora seeks that up to three dwellings is a permitted activity within the MDRZ, regardless of being attached or detached.	The submitter seeks to amend Rule 17.1A.3.1(a) to allow up to three dwellings per site, instead of two. They propose that these dwellings can be either physically joined or detached, with at least one being a minor dwelling. The reason is to permit up to three dwellings within the Medium Density Residential Zone (MDRZ) as a permitted activity.

	(Standard Development)				
OS171.20	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Support	Retain provision as notified	Kāinga Ora supports a maximum impervious coverage of 60%.	Submitter supports the proposal as notified. They seek to retain the current provision. Kāinga Ora agrees with a maximum impervious coverage of 60%.
OS171.21	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	Amend Standard 17.1A.3.1 (d) as follows: Building Coverage (d) Maximum building coverage is ~~40~~ 50 percent	Kāinga Ora seeks a maximum building coverage of 50% to provide for optimal building design and layout	**Summary of Submission:** The submitter requests amending Standard 17.1A.3.1(d) to increase maximum building coverage from 40% to 50%. This change aims to allow more flexibility for optimal building design and layout. Kāinga Ora supports this to improve development potential on sites.
OS171.22	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted	Oppose	Delete clause (iii). ~~(iii) is within the arc from 225 degrees to 135 degrees, or else is demonstrated to receive direct sunlight during midwinter;~~	Kainga Ora seeks that clause (iii) is deleted as this can result in an inefficient site layout.	**Submission Summary:** Kainga Ora requests the deletion of clause (iii). They argue this clause may lead to inefficient site layouts. The clause involves areas within a specific arc or receiving midwinter sunlight. Removing it would provide more flexibility in design.

	Activities (Standard Development)				

OS171.23	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	Delete the standard and replace with the following:
			
			Buildings are permitted if:
			
			• they do not project beyond a 45° recession plane measured from a point 3m above ground level along side and rear boundaries;
			• where the boundary forms part of a legal right of way, entrance strip or pedestrian access way, REr.17K.1.a. applies to the farthest boundary of that legal right of way, entrance strip or pedestrian access way; and
			• this standard does not apply to:
			  • a boundary with a road; and
			  • aerials, except dish antennas greater than 1m in diameter; and
			  • dormer windows and solar panels provided they are no more than 1.5m in height above the height permitted by the recession plane and make up no more than 25% of the length of the building or a maximum length of 2.5m, whichever is the lesser; and
			
			d. gable and other roof ends, where the roof ridge is generally at right angles to the site boundary. The end of the ridge must be no greater than 1.5m above the recession plane and no greater than 2.5m in area, and 2.5m in width. Only one intrusion is permitted per boundary; and
			e. Party walls, and any new allotment boundary related to these.
				Kāinga Ora considers that this provision is overly complicated and difficult to interpret. It also will lead to inefficient house and development outcomes. Kāinga Ora seeks a simpler, more enabling rule to allow for true medium density residential outcomes	**Summary of Submission**
					
					Kāinga Ora requests deleting the current building recession plane standard.
					
					They propose a simpler, clearer rule allowing buildings within a 45° recession plane from 3m above ground at side/rear boundaries.
					
					Certain elements like dormer windows, solar panels, gables, party walls, and rights of way have specific exceptions.
					
					The goal is to enable efficient, medium-density housing outcomes and reduce complexity and interpretation issues.

OS171.24	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	Amend Standard 17.1A.3.1 (k) as follows: The maximum height of buildings is 8 metres except the 50% of a building's roof in elevation, measured vertically from the junction between wall and roof, may exceed this height by 1m, where the entire roof slopes 15° or more, as shown in the following diagram:	Kāinga Ora supports the maximum height standard but seeks that the standard provides for design variations.	**Summary of Submission:** The submitter seeks to amend Standard 17.1A.3.1 (k) to allow building heights up to 8 metres, with an additional 1 metre height for 50% of sloped roofs (15° or more). They support the maximum height limit but want flexibility for design variations to accommodate roof slope exceptions.

					
OS171.25	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	Amend the standard to provide: (l) Buildings are set back at least ~~4.5~~ 2 metres from road boundaries… (m) Buildings are set back at least 1~~.5~~ metres from internal boundaries (side and rear), except… (o) Accessory buildings are set back at least 1~~.5~~ metres from side and rear boundaries, but less than 1~~.5~~ metres if: (p) ~~Dwellings are set back at least 25 metres from a rural zone boundary and at least 10 metres from an industrial zone boundary.~~	Kāinga Ora seek that the rule is simplified as it is overly complicated. Further, Kāinga Ora see that the front boundary is reduced to 2m and side boundaries to 1m to allow for true medium density outcomes. In addition, Kāinga Ora opposes additional boundary setbacks to the rural and industrial zones.	Submitter seeks to simplify setback rules, reducing front boundary setbacks from 4.5m to 2m and side setbacks from 1.5m to 1m to support medium density housing. They oppose additional setback requirements of 25m from rural zones and 10m from industrial zones. The aim is to make the standards less complicated and more enabling for development.
OS171.26	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensiv	Amend	Amend 17.1A.3.2 as follows: Construction of ~~two~~ four or more new dwellings on a site is a Restricted Discretionary activity. The conditions determine the scope of Council's discretion and consent decision-making process.	Consequential to the sought changes within this table, Kāinga Ora seek that up to three dwellings is permitted within the Medium Density Residential Zone.	Submitters seek to amend Rule 17.1A.3.2 to make construction of two or more new dwellings a Restricted Discretionary activity. They want up to three dwellings to be permitted in the Medium Density Residential Zone. This change aims to clarify the Council's discretion and streamline consent decisions.

	e Development)				
OS171.27	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Amend 17.1A.3.2 (10) as follows: For a proposal that does not comply with Condition b. the following matter(s) of discretion apply: 10. Whether there are factors that constrain the available development area or intensification opportunities including:	Delete the Medium Density Residential Design Matrix (Schedule 17.1AA). Kāinga Ora seeks that the Design Matrix is deleted and replaces with appropriate maters of discretion. Further, Kāinga Ora seeks that infrastructure setback are included as a matter of assessment when considering factors that constrain the available development area or intensification opportunities a. Site constraints (natural hazards, vegetation, streams, Infrastructure setbacks)	Submitter opposes the proposal. They seek to amend Rule 17.1A.3.2(10) to include infrastructure setbacks as a matter of discretion. They request deleting the Medium Density Residential Design Matrix (Schedule 17.1AA). Kāinga Ora wants the Design Matrix replaced with suitable matters of discretion. They emphasize considering site constraints like natural hazards, vegetation, streams, and infrastructure setbacks when assessing development limits.
OS171.28	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Support	Retain 17.1A.3.2(d) as notified		The submitter supports the proposal. They seek to retain rule 17.1A.3.2(d) as currently notified. No additional reasons were provided for their decision.
OS171.29	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3	Support	Retain 17.1A.3.2(e) as notified		The submitter requests to retain rule 17.1A.3.2(e) as originally notified. No additional reasons were provided for this decision.

	Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)				
OS171.30	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Amend 17.1A.3.2(f) and (g) as follows: (f) All buildings are set back at least 2~~.5~~ metres from the road boundary, except that all garages and carports are set back at least 5.5 metres from road boundary if the vehicle entrance of the garage or carport faces the road. (g) The minimum landscaped area of the 2~~.5~~ metre front yard is 50 percent (excluding vehicle crossings and footpath access).	Consequential to the submission on setbacks, Kāinga Ora seeks a 2m setback from the road boundary	**Summary of Submission:** Kāinga Ora requests amending setback rules to allow a 2m setback from the road boundary instead of 2.5m. They also seek changes to garage/carport setbacks and minimum landscaped front yard area. The reason is to align with their broader submission on setbacks.
OS171.31	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Amend 17.1A.3.2(k) as follows: No building shall project beyond a building envelope constructed by daylight admission lines commencing from points 3 metres vertically above ground level along all side and rear Medium Density Residential Zone and Residential Zone boundaries. The angle to be used is 60 degrees inwards from the boundary ~~up to a height of 6 metres above the boundary point, and thereafter at 45 degrees inwards from that point, applied continuously at every point along the boundary.~~	Kāinga Ora supports this provision but seeks that the 60 degree angle is provided along the entire site to avoid requiring to 'step in' first and second floors of a building.	The submitter supports the proposed daylight admission lines for building envelopes. They seek an amendment to apply the 60-degree angle along the entire site boundary. This change would avoid the need to step in upper floors of buildings. The intent is to maintain consistent building design while ensuring daylight access.
OS171.32	Proposed Plan Change No. 81	Support	Retain 17.1A.3.2 (l)	Kāinga Ora supports the additional height of buildings	**Submission Summary:**

	> Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)				The submitter supports the proposal. They seek to retain rule 17.1A.3.2 (l). Kāinga Ora supports allowing additional building height.
OS171.33	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Delete Limited Notification clause (c) in its entirety.	Kāinga Ora supports the non-notification clauses within (a) and (b) of the chapeau, however opposes 'limited notification' within (c). s95E of the RMA provides the appropriate steps to assess and consider whether persons are affected. Kāinga Ora considers that requiring limited notification regardless for setback or building envelope infringements is contrary to this. Mandatory notification does not consider mitigation or other factors that could provide appropriate measures to prevent an adjoining neighbour from being adversely affected.	**Submitter's position:** Kāinga Ora supports non-notification clauses (a) and (b) but opposes the limited notification clause (c). They argue s95E of the RMA already ensures affected persons are properly considered. Mandatory limited notification for setback or building envelope breaches ignores possible mitigation and unfairly affects neighbors. They seek deletion of clause (c) entirely.
OS171.34	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.1AA: Medium Density Residential Design Matrix	Oppose	Delete the Medium Density Residential Design Matrix in its entirety.	Kāinga Ora opposes the Medium Density Residential Design Matrix and seeks that it be removed in its entirety. The matrix relies on a rudimentary scoring framework that oversimplifies design assessment and does not provide for a balanced consideration of the overall quality and performance of a development. Its "tick-box" nature risks prioritising compliance with individual criteria over achieving high-quality urban design outcomes, while also constraining flexibility and innovation in design responses.	**Submission Summary:** Kāinga Ora requests deleting the Medium Density Residential Design Matrix entirely. They argue the matrix uses a basic scoring system that oversimplifies design assessment. This approach may lead to prioritizing checklist compliance over high-quality urban design.

					They also believe it limits design flexibility and innovation.
OS171.35	Proposed Plan Change No. 81 > Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications > 19.2 Information Required for Land Use or Subdivision Consent Applications	Oppose	Delete 19.2.1.9A in its entirety	Consequential to the Kāinga Ora submission to delete the Medium Density Housing Design Matrix in Schedule 17.1AA, Kāinga Ora opposes 19.2.1.9A	**Summary of Submission** Kāinga Ora requests deleting rule 19.2.1.9A entirely. This is linked to their submission to remove the Medium Density Housing Design Matrix in Schedule 17.1AA. They oppose maintaining rule 19.2.1.9A due to this change.
OS171.36	Proposed Plan Change No. 81 > Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications > Part II - Appendix 2: Urban Design Guide	Oppose	Delete the Urban Design Guide in its entirety. Alternatively, should its removal fall outside the scope of this plan change, Kāinga Ora seeks an amendment to ensure that development within the MDRZ is not required to be assessed against the Guide.	Kāinga Ora seeks the removal of the Urban Design Guide from the District Plan and considers that it would be more appropriately located as a standalone guidance document outside the Plan. In the alternative, if there is no scope through this plan change to remove the Guide, Kāinga Ora seeks that development within the MDRZ is not subject to assessment against the Urban Design Guide.	**Submission summary:** Kāinga Ora requests the **removal of the Urban Design Guide** from the District Plan. They consider it better suited as a separate guidance document outside the Plan. If removal is not possible in this plan change, they want **development in the MDRZ exempt** from assessment against the Guide.

Walter Robert Investments Ltd

Submitter 172

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS172.1	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > W - Z	Support	Retain the amended definition.	The existing definition is outdated and does not align with RSE standards.	The submitter supports the amended definition of worker accommodation, stating it better reflects modern RSE requirements and current orchard industry practice.
OS172.2	Proposed Plan Change No. 81 > Chapter 7: Rural Environment Effects > 7.1 Cumulative	Oppose	Delete the added wording from Policy 7.1.3.13.	The change creates confusion and contradicts existing enabling policy.	They oppose adding “worker accommodation” to Policy 7.1.3.13, as it implies worker accommodation can only occur where productive land is retained. They note Policy 7.1.3.14 already provides clear enabling policy.

	Effects of Land Fragmentation on Productive Opportunities				
OS172.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules	Oppose	Remove the 35-worker limit from Rural 1, Rural 2, and Rural Residential rules.	The orchard sector requires larger, village-style accommodation to operate efficiently and minimise productive land loss.	They strongly oppose the proposed 35-worker cap for controlled activity worker accommodation. WRIL employs 300–350 seasonal workers and states the limit is unworkable, inefficient, and would force multiple small facilities across productive land, increasing land loss and reducing pastoral care quality.
OS172.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules	Amend	Amend Restricted Discretionary rules to clearly state applicable preconditions and assessment matters.	Current drafting is unclear and risks inconsistent interpretation.	They seek clarity on whether preconditions apply to worker accommodation and which assessment matters are relevant. They request worker accommodation be separated into its own rule for certainty.
OS172.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules	Amend	Replace criteria with an assessment of landscaping to soften appearance.	Worker accommodation is a normal part of rural production and should not be treated as incompatible.	They oppose criteria requiring assessment of visibility of buildings, access, and carparking from neighbouring sites. They argue such facilities are expected in Rural 1 and should not be treated as adverse effects; landscaping is the appropriate focus.
OS172.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules	Amend	Add explicit enabling statements to Sections 7.2.30 and Rural Rule explanations.	Clarifies policy intent and supports consistent implementation.	They request additions to Rural Zone Principal Reasons sections to clearly state worker accommodation supports plant and animal production.
OS172.7	Proposed Plan Change No. 81 > Chapter 17: Zone Rules	Support	Retain amended noise rules.	The noise rules reflect realistic rural working environments and supports orchard operations.	Support noise rule amendments, noting their alignment with national standards applying during daytime hours on Sundays and public holidays.

Stephen Orrah

Submitter 173

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS173.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Amend	Amend Update Zone Map 80-36 to zone the site Medium Density Residential. If this is not accepted, retain the update map as drafted. Refer to original submission for more information.	The submitter considers the site could connect to infrastructure associated with neighbouring development and could assist with housing growth earlier than a deferred zoning. Refer to original submission for more information.	Supports rezoning of the site from Rural 1 Deferred Residential to Rural 1 Deferred Medium Density Residential, but seeks Medium Density Residential zoning instead.
OS173.2	Proposed Plan Change No. 81 > Maps > Area Maps > 07 - Proposed PC81 - Area - Mapua, Seaton Valley Rd	Support	Retain Update Area Map 80-07 as drafted.	The indicative walkway alignment bisected the rear of the submitter's property.	Supports removal of the indicative walkway from Map 80-07.
OS173.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Delete parts (b) to (e) of Policy 6.4A.3.11. Refer to original submission for more information.	The submitter considers higher densities should be enabled but not required.	Supports Policy 6.4A.3.11(a) but opposes parts (b) to (e) relating to minimum densities and lot sizes.

				Refer to original submission for more information.	
OS173.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Delete parts (a) and (b)(iii) of Policy 6.4A.3.12.	The submitter considers higher densities should be enabled but not required. Refer to original submission for more information.	Opposes Policy 6.4A.3.12(a) and (b)(iii) relating to minimum densities.
OS173.5	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Support	Retain as drafted, unless Council expectation is that improvements identified in an OSP (such as pedestrian and cycle linkages) as detailed below) would be undertaken prior to vesting, in which case it is requested that this provision be amended to make clear that any such improvements to the land prior to vesting would also form part of the financial contribution for reserves and community services in accordance with rule 16.5.2.4. Refer to original submission for more information.	It is appropriate that vesting of land for reserves form part of the financial contribution for reserves and community services, but it should be clear that any improvements made prior to vesting, if required by Council would also form part of the contributions. Refer to original submission for more information.	Support provision stating that any indicative reserve areas vested to Council will form part of the financial contribution for reserves and community services in accordance with rule 16.5.2.4. The Outline Spatial Plan Seaton Valley (OSP) requires that pedestrian and cycle linkages be incorporated where included in the OSP.
OS173.6	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Oppose	Delete the provisions and any associated matters for discretion. Refer to original submission for more information.	The submitter considers higher densities should be enabled but not required. Refer to original submission for more information.	Opposes subdivision conditions requiring a minimum net density.
OS173.7	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.10: Outline Spatial Plan - Mapua Seaton Valley	Amend	Delete references to minimum densities and amend Schedule 16.3D.10 to clarify: • Where the limited access frontage applies. • Where approved intersection points are. • Whether traffic calming measures on Seaton Valley Road are required. Refer to original submission for more information.	The submitter opposes minimum density requirements and seeks amendments on this specific element of the Outline Spatial Plan. Refer to original submission for more information.	Supports the Outline Spatial Plan 16.3D.10 generally and supports the walkway alignment, but opposes minimum density requirements.
OS173.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Oppose	Delete Policy 6.15.3.23, Assessment Criteria 16.3.3A.2, and information requirement 19.2.2.7A if they require assessment or mitigation relating to dam failure at 75 Seaton Valley Road. Alternatively, amend the provisions to specify the land to which they apply. Refer to original submission for more information.	The submitter considers responsibility for dam safety rests with the dam owner and that assessment or mitigation requirements should not be imposed on other landowners or developers. Refer to original submission for more information.	Opposes provisions that may require assessment or mitigation of risks associated with dam failure at 75 Seaton Valley Road.

OS173.9	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Delete the provision and any associated matters for discretion of Rule 17.1A.3.2(b). Refer to original submission for more information.	The submitter considers higher densities should be enabled but not required. Refer to original submission for more information.	Opposes development conditions requiring a minimum net density in Rule 17.1A.3.2(b)
OS173.10	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Amend the rule so the setback requirement does not apply to Rural Residential zone boundaries or land subject to deferred urban zoning. Refer to original submission for more information.	The submitter considers the setback could reduce the ability to achieve development densities on Medium Density Residential zoned land adjoining those areas. Refer to original submission for more information.	Opposes application of a 25 metre rural setback to all Rural Zone boundaries - Rule 17.1A.3.2 (r).
OS173.11	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Oppose	If the site is live-zoned, delete the provisions from the schedule. If live-zoning is not accepted, amend the schedule to either remove water and wastewater upgrades for T-250 or include water and wastewater upgrades for T-33a.	The submitter considers there is an inconsistency between servicing requirements for T-33a and T-250.	Opposes the servicing requirements in Schedule 17.14A for T-33a due to an apparent inconsistency with T-250.
OS173.12	Proposed Plan Change No. 81 > Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications > 19.2 Information Required for Land Use or Subdivision Consent Applications > 19.2.2 Subdivision	Oppose	Delete parts (b) to (d) of Rule 19.2.2.7A. Refer to original submission for more information.	The submitter considers assessment of development density is not an appropriate matter for Council where applicants have already assessed market viability. Refer to original submission for more information.	Oppose 19.2.2.7A (b) - (d) relating to information requirements for proposals that do not meet minimum density requirements.

Selwyn and Deborah King

Submitter 174

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS174.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 40 - Proposed PC81 - Zone - Motueka, Cnr Motueka Valley Hwy - College St	Support	Confirm Rural Residential zoning for T-17a.	The land has long been identified for rural-residential growth and aligns with neighbouring development patterns.	The submitters support the proposed rezoning of their 18.29 ha property to Rural Residential (unserviced). They note the land has been identified in multiple Future Development Strategies (including 2022 FDS) for rural-residential growth and that surrounding land to the south is already zoned Rural Residential (Pangatotara). Support non-notification for Restricted Discretionary subdivision (Rule 16.3.8.1A)

					Support flexible averaging rule (2,500 m² minimum / 5,000 m² average)
OS174.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones	Amend	Amend the controlled minimum lot size from 1 ha to 5,000 m².	5,000 m² aligns with neighbouring Rural Residential subdivision patterns and the Future Development Strategy. Geotechnical and hazard concerns can already be addressed through Land Disturbance Area 2 rules, Section 106 RMA, and NPS-Natural Hazards.	They oppose the proposed 1 ha minimum lot size for controlled subdivision. They seek 5,000 m², consistent with the adjoining Rural Residential zone to the south and with the lot sizes anticipated in the FDS. They note Council staff concerns about geotechnical stability can already be addressed through: • Land Disturbance Area 2 rules • Section 106 RMA • NPS-Natural Hazards Therefore, a larger minimum lot size is unnecessary and inconsistent with surrounding development.
OS174.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones	Amend	Remove: • Matter (9) – rural character/amenity effects • Reference to Schedule 16.3A	Once rezoned Rural Residential, rural character will inevitably change. Assessment matters should reflect Rural Residential outcomes, not Rural 2 character. Including Schedule 16.3A undermines the restricted-discretionary status by introducing excessive criteria.	They oppose applying all 18 assessment matters to Restricted Discretionary subdivision, stating this makes the rule effectively discretionary. They specifically oppose matter (9) relating to rural character/amenity and the reference to Schedule 16.3A (55 criteria).
OS174.4	Proposed Plan Change No. 81 > Maps > Area Maps > 10 - Proposed PC81 - Area - Motueka, Cnr Motueka Valley Hwy - College St	Oppose	Delete the indicative walkway from the planning map where it crosses their eastern boundary and private right-of-way.	The mapped location is unsuitable, conflicts with existing buildings, and cannot be delivered due to private ownership of the right-of-way. Walkway placement should be determined through subdivision design, considering dwelling locations, riparian management, ecological features, and access constraints.	They oppose the walkway shown along their eastern boundary and over a private right-of-way, noting it conflicts with existing buildings including their dwelling. They support walkways in principle but want location determined through subdivision design.
OS174.5	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones	Amend	Extend non-notification to related rules, including: • NTLDM compliance (e.g., right-of-way user thresholds) • Waterway rules • Land disturbance rules	Internal subdivision effects do not impact external parties. Broader non-notification provides certainty, reduces cost, and ensures subdivision potential can be realised without unnecessary notification triggers.	They seek non-notification to apply not only to Rule 16.3.8.1A but also to related rules that may be triggered during subdivision (NTLDM compliance, land disturbance, waterway rules). Their land's steep terrain and granite soils mean rights-of-way may exceed NTLDM thresholds, and notification for internal subdivision effects would be unnecessary and costly.

Brigid and Franz Ryan and Rienhoff

Submitter 175

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS175.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Support	retain provisions for Mapua	Our over arching concern as residents of Mapua in our 70s is to have an option to remain living in this community in appropriate housing: - single level	**Support** for retaining Mapua provisions. Submitters want suitable housing options for older residents, including single-level, 2-bedroom homes with good accessibility.

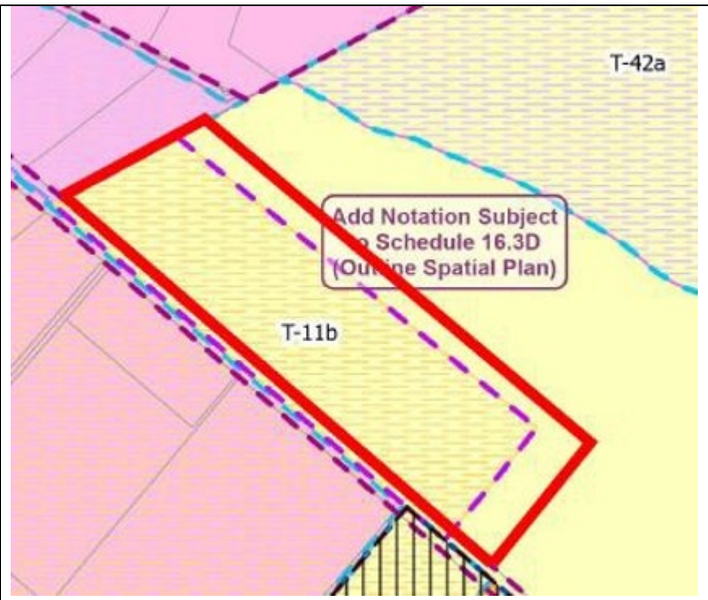
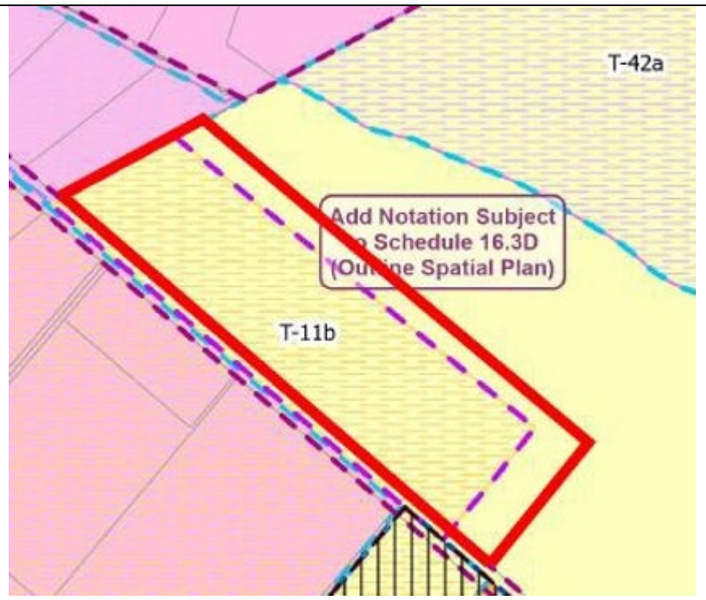
				- 2bedroom - accessibility inside and out - proximity to neighbours but not too close - easy pedestrian and cycling access to services in the village This type of housing future proofs us in the event of medical events or loss of mobility. Currently there is virtually no housing stock that meets this criteria. We see people 'disappearing' from this community almost weekly as they have to look at options closer to Nelson or in retirement villages. We want the possibility to continue living in our current network of services, friends and neighbours. This is important for us and for the mental and physical wellbeing of older residents of Mapua.	They emphasize the need for proximity to neighbors and easy access to village services by walking or cycling. Current housing options don't meet these needs, causing residents to leave the community. Maintaining these provisions supports the wellbeing and connectedness of older Mapua residents.
OS175.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Support	Retain zone changes for Mapua	Our over arching concern as residents of Mapua in our 70s is to have an option to remain living in this community in appropriate housing: - single level - 2bedroom - accessibility inside and out - proximity to neighbours but not too close - easy pedestrian and cycling access to services in the village This type of housing future proofs us in the event of medical events or loss of mobility. Currently there is virtually no housing stock that meets this criteria. We see people 'disappearing' from this community almost weekly as they have to look at options closer to Nelson or in retirement villages. We want the possibility to continue living in our current network of services, friends and neighbours. This is important for us and for the mental and physical wellbeing of older residents of Mapua.	The submitters support retaining the zone changes for Mapua. They seek housing options that suit older residents, such as single-level, two-bedroom homes with good accessibility. They want to stay in their community with easy access to services and neighbors, to maintain wellbeing and avoid relocating elsewhere. Current housing does not meet these needs, causing older residents to leave Mapua.

CKSV Mapua Limited Partnership

Submitter 176

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS176.1	Proposed Plan Change	Amend	Support and amend. Retain as notified and further amend Area Map 80-07 to retain the Indicative Walkway along the Indicative Esplanade / Riparian area	Retaining the Indicative Walkway from the operative TRMP Area Maps will more closely align with what is proposed in Schedule 16.3D.10 Outline Spatial Plan.	Support and amend. Retain as notified and further amend Area Map 80-07 to retain the Indicative Walkway along the Indicative Esplanade / Riparian area

	No. 81 > Maps > Area Maps > 07 - Proposed PC81 - Area - Mapua, Seaton Valley Rd				
OS176.2	Proposed Plan Change No. 81 > Maps > Area Maps > 08 - Proposed PC81 - Area - Mapua, Stafford Dr	Amend	Support and amend. Retain as notified and further amend Area Map 80-08 to retain the Indicative Walkway along the Indicative Esplanade / Riparian area	Retaining the Indicative Walkway from the operative TRMP Area Maps will more closely align with what is proposed in Schedule 16.3D.10 Outline Spatial Plan.	Support and amend. Retain as notified and further amend Area Map 80-08 to retain the Indicative Walkway along the Indicative Esplanade / Riparian area
OS176.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Amend	Support and amend. Retain and amend Zone Map 80-36 as follows: • Re-zone T-11b from *Rural 1 deferred Medium Density Residential Zone* to *Medium Density Residential Zone* • Re-zone T-42a from *Rural 1 deferred Residential Zone* to *Residential Zone* • Increase the extent of T-11b to match the areas proposed in CKSV's blue line amendments to the Outline Spatial Plan in Schedule 16.3D.10, and the red lines shown in the image below and in the full submission. Refer to original submission for more information.	CKSV supports the rezoning of areas as identified on Zone Map 80-36 to enable residential, open space and community facilities intensification for the reasons outlined in Appendix 1 of this submission. CKSV considers the appropriate sequencing and facilitation of growth in this area, plus the provisions of servicing, means that both T-11b and T-42a can now be up-zoned to their end-zoning. Refer to original submission for more information.	Support and amend. Retain and amend Zone Map 80-36 as follows: • Re-zone T-11b from *Rural 1 deferred Medium Density Residential Zone* to *Medium Density Residential Zone* • Re-zone T-42a from *Rural 1 deferred Residential Zone* to *Residential Zone* • Increase the extent of T-11b to match the areas proposed in CKSV's blue line amendments to the Outline Spatial Plan in Schedule 16.3D.10, and the red lines shown in the full submission. Refer to original submission for more information.

			 -		 -
OS176.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 37 - Proposed PC81 - Zone - Mapua, Stafford Dr	Amend	Retain and amend Zone Map 80-37 as follows: • Retain the zoning of T-42b as notified, at *Rural* 1 • Re-zone T-42a from *Rural 1 deferred Residential Zone* to <u>*Residential Zone*</u> Refer to original Submission for more information	CKSV supports the rezoning of areas as identified on Zone Map 80-36 to enable residential, open space and community facilities intensification for the reasons outlined in Appendix 1 of this submission. CKSV considers the appropriate sequencing and facilitation of growth in this area, plus the provisions of servicing, means that both T-42a and T-42b can now be up-zoned to their end-zoning.	Support and amend. Retain and amend Zone Map 80-37 as follows: • Retain the zoning of T-42b as notified, at *Rural* 1 • Re-zone T-42a from *Rural 1 deferred Residential Zone* to <u>*Residential Zone*</u> Refer to original Submission for more information
OS176.5	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > C	Amend	Amend the notified definition for 'comprehensive development' as follows: *Means a comprehensively planned and designed collection of three or more dwellings on one site <u>in the Residential Zone</u>~~, or two or more dwellings on one site in the~~ <u>and Medium Density Residential Zone, regardless of whether there are one or more existing dwellings already on the site.</u>* Notified provisions are shown in *italics*, with our requested amendments to clauses shown in red as either ~~strikethrough~~ or <u>underline</u>	The notified changes provide for more development in the Residential Zone compared with the Medium Density Residential Zone. The provision of two or more units is onerous and unnecessary for a two-unit development. These provisions should be retained as applying to three or more units for both the Residential and Medium Density Residential Zone. The amendment sought by CKSV better aligns with the notified Policy 6.4A.3.6	Support and amend. Amend the notified definition for 'comprehensive development'. The notified changes provide for more development in the Residential Zone compared with the Medium Density Residential Zone. The provision of two or more units is onerous and unnecessary for a two-unit development.
OS176.6	Proposed Plan Change No. 81 >	Support	Support and retain Objective 5.2.2 as notified.	The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.	Support and retain Objective 5.2.2 as notified. The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.

	Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.2 Objective				
OS176.7	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Support	Support and retain Policies 5.2.3.1, 5.2.3.2, 5.2.3.3 and 5.2.3.8A as notified	The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.	Support and retain Policies 5.2.3.1, 5.2.3.2, 5.2.3.3 and 5.2.3.8A as notified. The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.
OS176.8	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.20 Methods of Implementation	Support	Support and retain Method 5.2.20.3 as notified	The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.	Support and retain Method 5.2.20.3 as notified. The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.
OS176.9	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values >	Support	Support and retain 5.2.30 Principal Reasons and Explanation	The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.	Support and retain 5.2.30 Principal Reasons and Explanation. The amendments made to the *Visual Aesthetic and Character* suite recognises that urban environments are dynamic and evolve to support growth when needed, including by way of developing amenity values over time to support changing needs of the community.

	5.2.30 Principal Reasons and Explanation				
OS176.10	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development > 6.1.2 Objectives	Support	Support and retain Objective 6.1.2.1 as notified	Recognises the need for quality planning to ensure urban environments are well-functioning, sequenced appropriately and in combination, make Tasman District's towns successful places to live.	Support and retain Objective 6.1.2.1 as notified. Recognises the need for quality planning to ensure urban environments are well-functioning, sequenced appropriately and in combination, make Tasman District's towns successful places to live.
OS176.11	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development > 6.1.3 Policies	Support	Support and retain Policy 6.1.3.1(j) as notified.	Recognises the need for multiple visual forms and design, to prevent quality planning to ensure urban environments are well-functioning and sustainable for the community.	Support and retain Policy 6.1.3.1(j) as notified. Recognises the need for multiple visual forms and design, to prevent quality planning to ensure urban environments are well-functioning and sustainable for the community.
OS176.12	Proposed Plan Change No. 81 > Chapter	Support	Support and retain Policy 6.2.3.2A as notified	The amendments to this policy recognise the high standard of amenity intended for the Medium Density Residential zone, including areas of MDRZ in the Māpua area (whether deferred or presently zoned).	Support and retain Policy 6.2.3.2A as notified. The amendments to this policy recognise the high standard of amenity intended for the Medium Density Residential zone, including areas of MDRZ in the Māpua area (whether deferred or presently zoned).

	6: Urban Environment Effects > 6.2 Land Effects from Urban Growth > 6.2.3 Policies				
OS176.13	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth > 6.2.20 Methods of Implementation	Support	Support and retain Method 6.2.20.1(b) as notified	The amendments to this policy recognise the high standard of amenity intended for the Medium Density Residential zone, including areas of MDRZ in the Māpua area (whether deferred or presently zoned).	Support and retain Method 6.2.20.1(b) as notified. The amendments to this policy recognise the high standard of amenity intended for the Medium Density Residential zone, including areas of MDRZ in the Māpua area (whether deferred or presently zoned).
OS176.14	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Support and retain policy 6.3.3.1A	Policy 6.3.3.1A recognises that infrastructure upgrades may need to be developer-led if not programmed by Council due to being out of sequence. CKSV supports this option for urban infrastructure services.	Support and retain policy 6.3.3.1A. Policy 6.3.3.1A recognises that infrastructure upgrades may need to be developer-led if not programmed by Council due to being out of sequence. CKSV supports this option for urban infrastructure services.
OS176.15	Proposed Plan Change No. 81 >	Amend	Support and amend Policy 6.3.3.1B. Amend Policy 6.3.3.1B as follows:	CKSV seeks minor amendment to Policy 6.3.3.1B to recognise that appropriate sequencing of development can facilitate residential development where needed.	Support and amend Policy 6.3.3.1B. CKSV seeks minor amendment to Policy 6.3.3.1B to recognise that appropriate sequencing of development can facilitate residential development where needed.

	Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies		*Achieve at least minimum sufficient residential capacity at objective 6.2.2.3 through the identification and sequencing of land that is appropriate for residential development, including at medium densities, while recognising network infrastructure that achieves objective 15.2.2.1 may be programmed beyond a ten year window.* Notified provisions are shown in *italics*, with our requested amendments to clauses shown in red as either ~~strikethrough~~ or underline		
OS176.16	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	Support and amend Policy 6.3.3.1C. Amend Policy 6.3.3.1C as follows *When making decisions on resource consent applications, development that imposes additional load or pressure on infrastructure is avoided unless the necessary infrastructure is in place or able to be delivered to service it, including, where relevant:* … Notified provisions are shown in *italics*, with our requested amendments to clauses shown in red as either ~~strikethrough~~ or underline	Policy 6.3.3.1C requires amendment to enable the drafting to support developer-led works or upgrades.	Support and amend Policy 6.3.3.1C. Policy 6.3.3.1C requires amendment to enable the drafting to support developer-led works or upgrades.
OS176.17	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Support	Support and retain Policy 6.3.3.5A as notified	Provides clarity for the use of Outline Spatial Plans which will provide an integrated approach to planning and supports comprehensive development in specified areas to meet expected growth demands.	Support and retain Policy 6.3.3.5A as notified. Provides clarity for the use of Outline Spatial Plans which will provide an integrated approach to planning and supports comprehensive development in specified areas to meet expected growth demands.
OS176.18	Proposed Plan Change No. 81 > Chapter 6: Urban	Support	Support and retain 6.3.20 Methods of Implementation as notified.	Provides clarity.	Support and retain 6.3.20 Methods of Implementation as notified. Provides clarity.

	Environment Effects > 6.3 Urban Infrastructure Services > 6.3.20 Methods of Implementation				
OS176.19	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Amend	Retain Objectives 6.4A.2.1 and 6.4A.2.2 as notified. Support and amend 6.4A.2 Objectives. Amend heading as follows: 6.4.A.2 Objectives	Enables change in the urban environment that comes with the required intensification to meet expected housing demands, while also providing for a sustainable natural environment. CKSV anticipates the heading Objective 6.4.A.2 is a typographical error.	Support and amend 6.4A.2 Objectives. Retain Objectives 6.4A.2.1 and 6.4A.2.2 as notified. Enables change in the urban environment that comes with the required intensification to meet expected housing demands, while also providing for a sustainable natural environment. CKSV anticipates the heading Objective 6.4.A.2 is a typographical error.
OS176.20	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Support and retain Policies 6.4A.3.4	Provides clarity and ease of reference between provisions for General Residential and Medium Density Residential activities	Support and retain Policies 6.4A.3.4. Provides clarity and ease of reference between provisions for General Residential and Medium Density Residential activities
OS176.21	Proposed Plan Change No. 81 >	Support	Support and retain the following Policies as notified: • 6.4A.3.5 • 6.4A.3.6 • 6.4A.3.7	This policy suite enables change in the urban environment that provides a variety of housing types and affordability to support the needs of a changing community while providing for a well-functioning	Support and retain policies 6.4A.3.5 to 6.4A.3.17. This policy suite enables change in the urban environment that provides a variety of housing types and affordability to support the needs of a changing community while providing for a well-functioning and sustainable environment that utilises land and resources efficiently.

	Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies		• 6.4A.3.8 • 6.4A.3.9 • 6.4A.3.10 • 6.4A.3.11 • 6.4A.3.13 • 6.4A.3.15 • 6.4A.3.17	and sustainable environment that utilises land and resources efficiently.	
OS176.22	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.20 Methods of Implementation	Support	Support and retain Methods 6.4A.20.1, 6.4A.20.2 and 6.4A.20.3 as notified	This Methods framework supports the intended outcomes of the Medium Density Residential Zone.	Support and retain Methods 6.4A.20.1, 6.4A.20.2 and 6.4A.20.3 as notified. This Methods framework supports the intended outcomes of the Medium Density Residential Zone.
OS176.23	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.30 Principal Reasons	Support	Support and retain 6.4A.30 as notified	CKSV supports the Principal Reasons and Explanation as it provides the background and rationale for the use of Medium Density Residential zoning in the Tasman District and supports the Objective, Policy and Methods frameworks proposed by PC81.	Support and retain 6.4A.30 as notified. CKSV supports the Principal Reasons and Explanation as it provides the background and rationale for the use of Medium Density Residential zoning in the Tasman District and supports the Objective, Policy and Methods frameworks proposed by PC81.

	and Explanation				
OS176.24	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/ Ruby Bay > 6.15.1 Issues	Support	Support and retain the following Issues as notified: • 6.15.1.2 • 6.15.1.3 • 6.15.1.3A • 6.15.1.9 • 6.15.1.12	CKSV supports the notified amendments to the Issues Suite for Māpua/Ruby Bay. The amendments recognise the housing demand in the Māpua area, as well as the open space, ecology and stormwater attributes of the area. The Issues recognise the community's desire for variable types of housing, including smaller housing options (particularly for the elderly). CKSV supports in particular Policy 6.15.1.12 which recognises the importance of appropriate sequencing, which impacts up-zoning and uplifting of deferred zonings.	Support and retain the following Issues as notified: • 6.15.1.2 • 6.15.1.3 • 6.15.1.3A • 6.15.1.9 • 6.15.1.12 CKSV supports the notified amendments to the Issues Suite for Māpua/Ruby Bay. The amendments recognise the housing demand in the Māpua area, as well as the open space, ecology and stormwater attributes of the area. The Issues recognise the community's desire for variable types of housing, including smaller housing options (particularly for the elderly). CKSV supports in particular Policy 6.15.1.12 which recognises the importance of appropriate sequencing, which impacts up-zoning and uplifting of deferred zonings.
OS176.25	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/ Ruby Bay > 6.15.3 Policies	Amend	Support and retain the following Policies as notified: • 6.15.3.1 • 6.15.3.8 • 6.15.3.12 • 6.15.3.13 • 6.15.3.13A • 6.15.3.18 • 6.15.3.20 • 6.15.3.22 • And: Amend numbering of 6.15.323 to 6.15.3.23 And Amend policy 6.15.3.19 as follows: *"To avoid residential development within the Māpua and Ruby Bay settlements where wastewater, water supply, stormwater, or transport infrastructure is not available or not to be delivered within 3 years, and where development would result in significant adverse effects on the performance of those networks.* Notified provisions are shown in *italics*, with our requested amendments to clauses shown in red as either ~~strikethrough~~ or underline	CKSV supports the notified amendments to the Policy framework for Māpua/Ruby Bay. The amendments recognise the housing demand in the Māpua area, as well as the increased pressure on reticulated service. CKSV supports in particular Policy 6.15.3.18 which recognises the importance of appropriate sequencing, which impacts up-zoning and uplifting of deferred zonings and Policy 6.15.3.22 which will enhance the intended wetland rejuvenation and stormwater catchment project intended for its site. CKSV anticipates the numbering of Policy 6.15.3.23 is a typographical error.	Support and retain the following Policies as notified: • 6.15.3.1 • 6.15.3.8 • 6.15.3.12 • 6.15.3.13 • 6.15.3.13A • 6.15.3.18 • 6.15.3.20 • 6.15.3.22 • And: Amend numbering of 6.15.323 to 6.15.3.23 And Amend policy 6.15.3.19 as follows: *"To avoid residential development within the Māpua and Ruby Bay settlements where wastewater, water supply, stormwater, or transport infrastructure is not available or not to be delivered within 3 years, and where development would result in significant adverse effects on the performance of those networks.* Notified provisions are shown in *italics*, with our requested amendments to clauses shown in red as either ~~strikethrough~~ or underline CKSV supports the notified amendments to the Policy framework for Māpua/Ruby Bay. The amendments recognise the housing demand in the Māpua area, as well as the increased pressure on reticulated service. CKSV supports in particular Policy 6.15.3.18 which recognises the importance of appropriate sequencing, which impacts up-zoning and uplifting of deferred zonings and

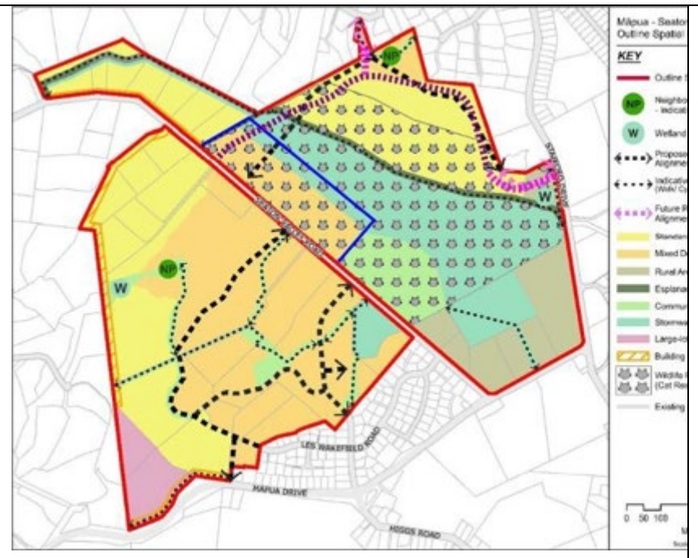
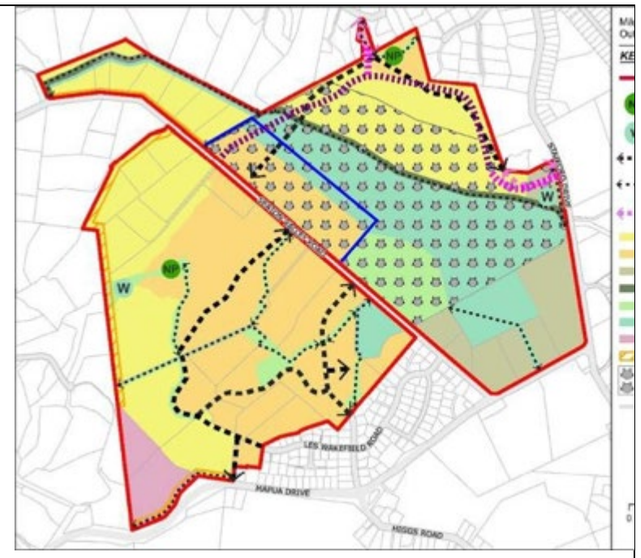
					Policy 6.15.3.22 which will enhance the intended wetland rejuvenation and stormwater catchment project intended for its site. CKSV anticipates the numbering of Policy 6.15.3.23 is a typographical error.
OS176.26	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/ Ruby Bay > 6.15.20 Methods of Implementation	Support	Support and retain Methods 6.15.20.1(g), 6.15.20.1(h) and 6.15.20.1(i) as notified	The amendments to the Māpua/Ruby Bay Methods of Implementation align with the Issues and Policy framework in PC81.	Support and retain Methods 6.15.20.1(g), 6.15.20.1(h) and 6.15.20.1(i) as notified. The amendments to the Māpua/Ruby Bay Methods of Implementation align with the Issues and Policy framework in PC81.
OS176.27	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/ Ruby Bay > 6.15.30 Principal Reasons and Explanation	Support	Support and retain 6.15.30 Principal Reasons and Explanation as notified	The amendments to the Māpua/Ruby Bay Methods of Implementation align with the Issues and Policy framework in PC81 and appropriately recognise sequencing pressures.	Support and retain 6.15.30 Principal Reasons and Explanation as notified. The amendments to the Māpua/Ruby Bay Methods of Implementation align with the Issues and Policy framework in PC81 and appropriately recognise sequencing pressures.
OS176.28	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3	Support	Support and retain Figure 16.3A(xi) as notified	Provides clarity for Minimum Allotment Areas within the Māpua Outline Spatial Plan areas.	Support and retain Figure 16.3A(xi) as notified. Provides clarity for Minimum Allotment Areas within the Māpua Outline Spatial Plan are as.

	Subdivision				
OS176.29	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3 Residential Zone > 16.3.3.1 Controlled Subdivision (Residential Zone - Standard Density Development)	Amend	Support and amend Condition (j) of Rule 16.3.3.1. Amend Condition (j) of Rule 16.3.3.1 as follows: *(j) In the areas subject to the Outline Spatial Plans in Schedules 16.3D.8, 16.3D.9 or 16.3D.10:* *(i) Council-supplied water capacity for the proposed lots is available or able to be delivered; and* *(ii) Council wastewater capacity for the proposed lots is available or able to be delivered.* Notified provisions are shown in *italics*, with our requested amendments to clauses shown in red as either ~~strikethrough~~ or underline	Ensures required servicing and infrastructure is available to subdivide as a controlled activity. CKSV seeks the amendment to enable servicing to be provided on a developer-led basis.	Support and amend Condition (j) of Rule 16.3.3.1. Ensures required servicing and infrastructure is available to subdivide as a controlled activity. CKSV seeks the amendment to enable servicing to be provided on a developer-led basis. Amend Condition (j) of Rule 16.3.3.1 as follows: *(j) In the areas subject to the Outline Spatial Plans in Schedules 16.3D.8, 16.3D.9 or 16.3D.10:* *(i) Council-supplied water capacity for the proposed lots is available or able to be delivered; and* *(ii) Council wastewater capacity for the proposed lots is available or able to be delivered.* Notified provisions are shown in *italics*, with our requested amendments to clauses shown in red as either ~~strikethrough~~ or underline
OS176.30	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3 Residential Zone > 16.3.3.1A Controlled Subdivision	Support	Support and retain Rule 16.3.3A.1 Controlled Subdivision – Medium Density Residential Zone – Land Use Led.	The Medium Density Residential Zoning rules for subdivision within Outline Spatial Plans provides for a variety of housing types and supports the needs of a changing community while providing for a well-functioning and sustainable environment that utilises land and resources efficiently. The Medium Density Residential Zone is also consistent with the Nelson Tasman Future Development Strategy, and implements the NPS-UD.	Support and retain Rule 16.3.3A.1 Controlled Subdivision – Medium Density Residential Zone – Land Use Led. The Medium Density Residential Zoning rules for subdivision within Outline Spatial Plans provides for a variety of housing types and supports the needs of a changing community while providing for a well-functioning and sustainable environment that utilises land and resources efficiently. The Medium Density Residential Zone is also consistent with the Nelson Tasman Future Development Strategy, and implements the NPS-UD.

	(Residential Zone - Specific Location: Richmond Intensive Development Area)				
OS176.31	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.3 Restricted Discretionary Activity Subdivision (Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area)	Support	Support and retain Rule 16.3.3A.3 Restricted Discretionary Activity Subdivision (Medium Density Residential Zone – Vacant Allotment in Outline Spatial Plan area).	The Medium Density Residential Zoning rules for subdivision within Outline Spatial Plans provides for a variety of housing types and supports the needs of a changing community while providing for a well-functioning and sustainable environment that utilises land and resources efficiently. The Medium Density Residential Zone is also consistent with the Nelson Tasman Future Development Strategy, and implements the NPS-UD.	Support and retain Rule 16.3.3A.3 Restricted Discretionary Activity Subdivision (Medium Density Residential Zone – Vacant Allotment in Outline Spatial Plan area). The Medium Density Residential Zoning rules for subdivision within Outline Spatial Plans provides for a variety of housing types and supports the needs of a changing community while providing for a well-functioning and sustainable environment that utilises land and resources efficiently. The Medium Density Residential Zone is also consistent with the Nelson Tasman Future Development Strategy, and implements the NPS-UD.
OS176.32	Proposed Plan Change	Amend	Amend Rule 16.3.3A.2 (r) as follows: *Māpua Servicing Capacity*	Ensures required servicing and infrastructure is available to subdivide as a controlled activity. As above for Rule 16.3.3.1,	Amend Rule 16.3.3A.2 (r) as follows: *Māpua Servicing Capacity*

	No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area		*(r) In the areas subject to the Outline Spatial Plans in Schedules 16.3D.8, 16.3D.9 or 16.3D.10:* *Council-supplied water capacity for the proposed lots is available or able to be delivered; and* *(ii) Council wastewater capacity for the proposed lots is available or able to be delivered.*	CKSV seeks the amendment to enable servicing to be provided on a developer-led basis.	*(r) In the areas subject to the Outline Spatial Plans in Schedules 16.3D.8, 16.3D.9 or 16.3D.10:* *Council-supplied water capacity for the proposed lots is available or able to be delivered; and* *(ii) Council wastewater capacity for the proposed lots is available or able to be delivered.* Ensures required servicing and infrastructure is available to subdivide as a controlled activity. As above for Rule 16.3.3.1, CKSV seeks the amendment to enable servicing to be provided on a developer-led basis.
OS176.33	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.20 Principal Reasons for Rules	Support	Support and retain 16.3.20 Principal Reasons for Rules	The notified amendments support the Medium Density Residential Zone rules being implemented by PC81.	Support and retain 16.3.20 Principal Reasons for Rules. The notified amendments support the Medium Density Residential Zone rules being implemented by PC81.
OS176.34	Proposed Plan Change No. 81 >	Support	Support and retain Schedule 16.3A Assessment Criteria (4B), (4C) and (42) as notified	Ensures clarity and consistency for proposed subdivision within Outline Spatial Plans.	Support and retain Schedule 16.3A Assessment Criteria (4B), (4C) and (42) as notified. Ensures clarity and consistency for proposed subdivision within Outline Spatial Plans.

	Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3A: Assessment Criteria for Subdivision				
OS176.35	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Support	Support and retain introductory drafting in Schedule 16.3D as notified	CKSV supports the introduction of Outline Spatial Plans for areas of desired residential development, such as its site at Seaton Valley Road. Outline Spatial Plans allow for a specified approach to recognise different needs of each community and their natural and urban environments.	Support and retain introductory drafting in Schedule 16.3D as notified. CKSV supports the introduction of Outline Spatial Plans for areas of desired residential development, such as its site at Seaton Valley Road. Outline Spatial Plans allow for a specified approach to recognise different needs of each community and their natural and urban environments.
OS176.36	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D:	Amend	Retain Schedule 16.3D.10 and amend as per **Figure 4 in Appendix 1 of the original submission** , and below: • Enlarge the orange Medium Density Housing Area to the extent shown by the blue line. • Amend the proposed road indicative alignment to that shown in the purple dashed line; • Amend the Future Road Indicative Alignment to that as shown by the magenta dashed line; and	Support the introduction of the Māpua Seaton Valley Road Outline Spatial Plan, being Schedule 16.3D.10 as a way to guide development through a structured framework that ensures sustainable growth to meet expected demands and long-term planning. However, CKSV requests additional amendments to Schedule 16.3D.10 to better align with the intended development of the site and final land use, and CKSV's requested relief on the Zoning Maps earlier in this submission: • the Proposed Road Indicative Alignment,	Retain Schedule 16.3D.10 and amend as per **Figure 4 in Appendix 1 of the original submission** , and below: • Enlarge the orange Medium Density Housing Area to the extent shown by the blue line. • Amend the proposed road indicative alignment to that shown in the purple dashed line; • Amend the Future Road Indicative Alignment to that as shown by the magenta dashed line; and

	Outline Spatial Plans		• 	• Future Road Indicative Alignment, an d extent of the Medium Density Housing Area.	•  Support the introduction of the Māpua Seaton Valley Road Outline Spatial Plan, being Schedule 16.3D.10 as a way to guide development through a structured framework that ensures sustainable growth to meet expected demands and long-term planning. However, CKSV requests additional amendments to Schedule 16.3D.10 to better align with the intended development of the site and final land use, and CKSV's requested relief on the Zoning Maps earlier in this submission: • the Proposed Road Indicative Alignment, • Future Road Indicative Alignment, and - extent of the Medium Density Housing Area.
OS176 .37	Propose d Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Resident ial Zone Rules > 17.1A.2 Land Use > 17.1A.2. 1 Permitte d Activities	Sup port	Support and retain rules 17.1A.1 and 17.1A.3.1.	CKSV generally supports the introduced rule framework for land use within the Medium Density Re sidential Zone, as being appropriate to deliver the necessary housing intensity	Support and retain rules 17.1A.1 and 17.1A.3.1. CKSV generally supports the introduced rule framework for land use within the Medium Density Residential Zone, as being appropriate to deliver the necessary housing intensity

	(Land Use - General)				
OS176.38	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Amend the activity status for comprehensive developments located within an Outline Spatial Plan which meet the condition set out under 17.1A.3.2, from restricted discretionary to controlled activity. Consequential amendments to Principal Reasons for Rules 17.1A.20 to align with the change of activity status from restricted discretionary to controlled.	Amendments sought are consistent with subdivision provisions for the same activity (see Rule 16.3.3A.2) and provide the opportunity for greater certainty to the developer.	Amend the activity status for comprehensive developments located within an Outline Spatial Plan which meet the condition set out under 17.1A.3.2, from restricted discretionary to controlled activity. Consequential amendments to Principal Reasons for Rules 17.1A.20 to align with the change of activity status from restricted discretionary to controlled. Amendments sought are consistent with subdivision provisions for the same activity (see Rule 16.3.3A.2) and provide the opportunity for greater certainty to the developer.
OS176.39	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Oppose and amend Schedule 17.14A . Amend Schedule 17.14A to delete the entirety of the entries at: ~~Seaton Valley Greenfield Land T-42a~~ ~~Seaton Valley Greenfield Land T-11a~~	On the basis that CKSV's principle relief – that its sites T-11b and T-42a are both upzoned to their deferred zoning – is granted, both sites are to be removed from Schedule 17.14A	Oppose and amend Schedule 17.14A . Amend Schedule 17.14A to delete the entirety of the entries at: ~~Seaton Valley Greenfield Land T-42a~~ ~~Seaton Valley Greenfield Land T-11a~~ On the basis that CKSV's principle relief – that its sites T-11b and T-42a are both upzoned to their deferred zoning – is granted, both sites are to be removed from Schedule 17.14A
OS176.40	Proposed Plan	Support	Support and retain 19.2.1.9A and 19.2.1.9B.	Provides clarity to land use consent application processes in the Medium Density Residential Zone.	Support and retain 19.2.1.9A and 19.2.1.9B. Provides clarity to land use consent application processes in the Medium Density Residential Zone.

	Change No. 81 > Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications > 19.2 Information Required for Land Use or Subdivision Consent Applications > 19.2.1 Land Use				
OS176.41	Proposed Plan Change No. 81 > Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications > 19.2 Information Required	Support	Support and retain 19.2.2.7A.	Provides clarity to land use consent application processes in the Medium Density Residential Zone.	Support and retain 19.2.2.7A. Provides clarity to land use consent application processes in the Medium Density Residential Zone.

	for Land Use or Subdivision Consent Applications > 19.2.2 Subdivision				

Rose and Kate Windle

Submitter 178

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS178.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 55 - Proposed PC81 - Zone - Takaka Central East	Amend	Retain with amendments	i) the proposed rezoning would provide residential growth capacity as required in the District; ii) there is limited land available within the Takaka which is suitable for residential greenfield development. The land around and centred on the recreation park were first recognised as a growth area some 15 years ago, and the initial stage of the Greenways subdivision responded to that. Given its elevation, the Park Avenue site is particularly appropriate for such development given it avoids flood risk. A rezoning will provide for the efficient use of resources; iii) the location amendment of this deferred residential area, as sought in this feedback, would provide a practical and logical extension from the existing residential development while limiting unnecessary fragmentation of the existing farm; and iv) the proposed rezoning is consistent with the Future Development Strategy and the National Policy Statement for Urban Development.	The Windle family supports the identification of their land at Park Avenue for future residential growth and subsequent rezoning to this effect, with amendment to the zone boundaries, under Plan Change 81
OS178.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 55 - Proposed PC81 - Zone - Takaka Central East	Support	Retain	v) existing uses of the wider area and adjoining properties already include a mix of light industrial and commercial activities. A rezoning as sought is therefore consistent with the changing character of the area; vi) there is limited land available within the Takaka which is suitable to a light industrial	The Windle family supports the identification of their land at the Motupipi Street for industrial use and the subsequent rezoning to this effect, under Plan Change 81

				zoning and use. A rezoning will provide for the efficient use of resources; vii) a rezoning would support the economic well-being of the community; viii) the subject land is strategically well situated to function as part of, and to consolidate, the urban area of Takaka. The location of the subject land allows for easy access to the site and in and out of the Takaka township; and ix) the proposed rezoning is consistent with the Future Development Strategy and the National Policy Statement for Urban Development.	
OS178.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 56 - Proposed PC81 - Zone - Takaka, Park Ave	Amend	Retain with amendments A rectangle shaped road alignment is sought through the amended zone boundary area, starting and ending at Coote Street and Windle Road.	The indicative road would provide a safe and practical roading link with the existing streets, providing future transparency and consistency with the surrounding area. i) the proposed rezoning would provide residential growth capacity as required in the District; ii) there is limited land available within the Takaka which is suitable for residential greenfield development. The land around and centred on the recreation park were first recognised as a growth area some 15 years ago, and the initial stage of the Greenways subdivision responded to that. Given its elevation, the Park Avenue site is particularly appropriate for such development given it avoids flood risk. A rezoning will provide for the efficient use of resources; iii) the location amendment of this deferred residential area, as sought in this feedback, would provide a practical and logical extension from the existing residential development while limiting unnecessary fragmentation of the existing farm; and iv) the proposed rezoning is consistent with the Future Development Strategy and the National Policy Statement for Urban Development.	The Windle family supports the introduction of an Indicative Road at the Park Avenue site, on the basis that there is an amendment
OS178.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.5 Land for Industrial Activities > 6.5.3 Policies	Support	Retain Policy 6.5.3.1A as drafted.	This is consistent with changes to the TRPS, and the intention of Plan Change 81 to ensure sufficient and well-located business land to support economic growth and employment.	Support Policy 6.5.3.1A for land for industrial activities: To provide a supply of suitable land for regional and district industrial needs for the medium to long term, to at least 2054.

OS178.5	Proposed Plan Change No. 81 > Maps > Zone Maps > 56 - Proposed PC81 - Zone - Takaka, Park Ave	Amend	Amend Update Zone Map 80-53 to reflect zone boundary changes sought below in relation to the submitters property. See image below for proposed boundary 	i) the proposed rezoning would provide residential growth capacity as required in the District; ii) there is limited land available within the Takaka which is suitable for residential greenfield development. The land around and centred on the recreation park were first recognised as a growth area some 15 years ago, and the initial stage of the Greenways subdivision responded to that. Given its elevation, the Park Avenue site is particularly appropriate for such development given it avoids flood risk. A rezoning will provide for the efficient use of resources; iii) the location amendment of this deferred residential area, as sought in this feedback, would provide a practical and logical extension from the existing residential development while limiting unnecessary fragmentation of the existing farm; and iv) the proposed rezoning is consistent with the Future Development Strategy and the National Policy Statement for Urban Development.	Support rezoning of subject land on Park Avenue (Area T 144) from Rural 1 to deferred Residential zone with amendment to the zone
OS178.6	Proposed Plan Change No. 81 > Maps > Zone Maps > 55 - Proposed PC81 - Zone - Takaka Central East	Support	Retain Update Zone Map 80-55 as drafted in relation to the submitters property at Motupipi Street (Area T 228) where it is to be rezoned Industrial Zone.	v) existing uses of the wider area and adjoining properties already include a mix of light industrial and commercial activities. A rezoning as sought is therefore consistent with the changing character of the area; vi) there is limited land available within the Takaka which is suitable to a light industrial zoning and use. A rezoning will provide for the efficient use of resources; vii) a rezoning would support the economic well-being of the community; viii) the subject land is strategically well situated to function as part of, and to consolidate, the urban area of Takaka. The location of the subject land allows for easy access to the site and in and out of the Takaka township; and ix) the proposed rezoning is consistent with the Future Development Strategy and the National Policy Statement for Urban Development.	Support rezoning of subject land on Motupipi Street (Area T 228) from Rural 1 to Industrial zone.
OS178.7	Proposed Plan Change No. 81 > Maps > Zone Maps > 56 - Proposed PC81 - Zone - Takaka, Park Ave	Amend	Amend Update Area Map 80-25 to reflect road alignment changes sought to support the zone boundary amendments above. Namely, a rectangle shaped road alignment is sought through the amended zone boundary area, starting and ending at Coote Street and Windle Road.	The Windle family supports the introduction of an Indicative Road at the Park Avenue site, on the basis that there is an amendment to alignment of this road to reflect the changes sought to the zone boundary as set out in paragraph 21 above and Table 1 below. A rectangle shaped road alignment is sought through the amended zone boundary area, starting and ending at Coote Street and Windle Road. The indicative road would provide a safe and practical	Support the location of the Indicative Road at the submitters Park Avenue site (Area T-144), with amendments sought to the alignment of this road to reflect above to the zone boundary.

				roading link with the existing streets, providing future transparency and consistency with the surrounding area. **The submission references a lot between paragraphs so refer to original submission for details.**	

Daniel and Andrea Freilich

Submitter 179

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS179.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Amend	Amend Zone Map 80-36 to zone T-33b Medium Density Residential. If this relief is not accepted, retain the existing Residential zoning.	The submitters consider live Medium Density Residential zoning is more consistent with their intended development programme and would better achieve the residential growth outcomes sought by Plan Change 81. The submitters state that sufficient servicing capacity exists to enable continued development of their remaining land and that development of the site does not depend on the infrastructure upgrades identified through the deferred zoning framework	Oppose the proposed rezoning of T-33b from Residential Zone to Residential Deferred Medium Density Residential Zone and instead support live Medium Density Residential zoning. The submitters support Medium Density Residential zoning in principle because it is consistent with the intent of Plan Change 81 and the proposed changes to the Tasman Regional Policy Statement to provide sufficient and well-located residential land for housing growth. However, the submitters consider deferred zoning will not achieve the desired housing growth outcomes because their intended development timeframe is shorter than the anticipated timing of infrastructure upgrades and development of the site does not rely on those upgrades.
OS179.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 36 - Proposed PC81 - Zone - Mapua, Seaton Valley Rd	Oppose	Amend Zone Map 80-36 to remove the proposed Commercial zoning from T-248, T-239 and T-242.	The submitters consider Māpua Drive should maintain its role as a high-amenity gateway to Māpua and that introducing additional commercial zoning in this location would be inconsistent with that role. The submitters also consider commercial activity should be concentrated within the existing town centre rather than dispersed along Māpua Drive.	Oppose the proposed Commercial zoning of T-248, T-239 and T-242. The submitters consider commercial development should remain focused within the existing Māpua town centre and that additional commercial zoning in this location is unnecessary.
OS179.3	Proposed Plan Change No. 81 > Maps > Area Maps > 07 - Proposed PC81 - Area - Mapua, Seaton Valley Rd	Support	Amend Area Map 80-07 to remove the Indicative Road.	The submitters consider the existing indicative road alignment, including the proposed connection to Māpua Drive, is inappropriate and should not be retained on the planning map.	Support removal of the Indicative Road from Area Map 80-07. The submitters consider the proposed road alignment and its connection to Māpua Drive are inappropriate.
OS179.4	Proposed Plan Change No. 81 > Maps > Area Maps > 07 - Proposed PC81 - Area - Mapua, Seaton Valley Rd	Oppose	Delete the Road Traffic Noise Overlay from Area Map 80-07.	The submitters consider the provisions associated with the Road Traffic Noise Overlay place unnecessary costs on applicants to address low-	Oppose the introduction of the Road Traffic Noise Overlay on Area Map 80-07. The submitters consider the overlay imposes unnecessary costs on

				level reverse sensitivity effects associated with low-speed roads and are therefore not justified.	development to address low-level reverse sensitivity risks.
OS179.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Oppose	Delete Policy 5.2.3.8A.	The submitters consider the policy places unnecessary costs on applicants by requiring mitigation of low-level reverse sensitivity effects associated with low-speed roads. The submitters do not consider the policy response is justified given the level of risk being addressed.	Oppose the introduction of Policy 5.2.3.8A relating to road traffic noise. The submitters consider the policy imposes unnecessary requirements on development to address low-level reverse sensitivity risks associated with local roads.
OS179.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Support	Retain Policy 6.4A.3.11(a) as notified.	The submitters support the use of Outline Spatial Plans to guide subdivision and development within Medium Density Residential Zone areas and support the requirement for development to generally occur in accordance with an approved Outline Spatial Plan.	Support Policy 6.4A.3.11(a), which generally requires subdivision and development within Medium Density Residential Zone areas subject to an Outline Spatial Plan to be undertaken in accordance with the applicable Outline Spatial Plan.
OS179.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Delete Policy 6.4A.3.11(b) to (e).	The submitters consider the TRMP should enable higher-density development but should not mandate it. They consider mandatory density requirements and prescribed lot size outcomes could create planning blight where market demand does not support the housing forms anticipated by the policy. The submitters note that the proposed information requirements already require consideration of market demand for lots and housing types and therefore recognise that market forces will influence development viability. The submitters consider it is unnecessary and inappropriate for Council to determine minimum density outcomes through these provisions.	Oppose Policy 6.4A.3.11(b) to (e), which require minimum residential densities, a variety of lot sizes, future comprehensive development requirements and mandatory density achievement provisions within Outline Spatial Plan areas.
OS179.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Oppose	Delete Policy 6.4A.3.12(a) and Policy 6.4A.3.12(b)(iii).	The submitters consider mandatory minimum density requirements may create planning blight where market demand does not support the densities required by the policy. The submitters consider that where demand exists, enabling higher densities is sufficient and it is unnecessary to require specific density outcomes through the policy framework. The submitters consider development density should respond to market demand and development viability rather than being mandated through district plan provisions.	Oppose Policy 6.4A.3.12(a) and 6.4A.3.12(b)(iii), which require minimum residential densities and restrict subdivision that does not achieve those minimum density outcomes. The submitters consider the plan should enable higher-density residential development where there is demand, but should not mandate minimum density outcomes.
OS179.9	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Oppose	Delete Rule 16.3.3A.2(b) and Rule 16.3.3A.4(b), together with any associated matters of discretion.	The submitters consider mandatory minimum density requirements may result in planning blight where market demand does not support the densities anticipated by the rules. The submitters consider that where a market exists,	Oppose Rule 16.3.3A.2(b) and Rule 16.3.3A.4(b), which require subdivision proposals to achieve specified minimum net density outcomes. The submitters consider higher-density development

				enabling higher densities is sufficient and that the district plan should not require minimum density outcomes. Development density should be responsive to market demand and development feasibility rather than being prescribed through subdivision rules.	should be enabled, but not mandated through minimum density requirements.
OS179.10	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.2 Controlled Subdivision - Medium Density Residential Zone - Vacant Allotment in Outline Spatial Plan area	Oppose	Delete Rule 16.3.3A.2(j) and any associated matters of discretion.	The submitters consider the rule places unnecessary costs on applicants by requiring acoustic assessments to address low-level reverse sensitivity effects associated with low-speed roads. The submitters do not consider the level of risk justifies the additional assessment requirements and associated development costs.	Oppose the introduction of Rule 16.3.3A.2(j), which requires an acoustic assessment to accompany subdivision applications within the Medium Density Residential Zone where land is affected by the Road Traffic Noise Overlay. The submitters consider the requirement imposes unnecessary costs on development to address low-level reverse sensitivity risks associated with local roads.
OS179.11	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.10: Outline Spatial Plan - Mapua Seaton Valley	Amend	Amend Schedule 16.3D.10 and the Māpua Seaton Valley Outline Spatial Plan to relocate the Proposed Road Indicative Alignment along the western boundary of the submitters' land. If live Medium Density Residential zoning of the submitters' land is not accepted, amend the Outline Spatial Plan to exclude the submitters' land from the Outline Spatial Plan area.	The submitters consider the proposed road alignment is unsuitable because there is insufficient width within their property to accommodate the road, the alignment is not required to facilitate development of their land, and the proposed connection point to Māpua Drive has inadequate visibility and insufficient space within the road reserve to safely construct an intersection. The submitters consider a more appropriate road alignment and intersection location exists further west. The submitters also consider that if deferred zoning remains, their land will be developed before the deferred zoning takes effect, making inclusion within the Outline Spatial Plan unnecessary and irrelevant to the future development of the site.	Support the Māpua Seaton Valley Outline Spatial Plan in general but seek amendments to the Proposed Road Indicative Alignment. The submitters consider the proposed road alignment and intersection connection to Māpua Drive are inappropriate and that a more suitable alignment exists along the western boundary of the submitters' land. The submitters also oppose inclusion of their land within the Outline Spatial Plan if the proposed deferred Medium Density Residential zoning is retained, as they consider their land will be developed before the deferred zoning is uplifted and therefore the Outline Spatial Plan would not be relevant to future development of the site.
OS179.12	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Delete Rule 17.1A.3.2(b) and any associated matters of discretion.	The submitters consider mandatory density requirements may result in planning blight where market demand does not support the densities anticipated by the rule. The submitters consider that where a market exists, enabling higher densities is sufficient and that it is unnecessary for the district plan to mandate minimum density outcomes. Development density should instead respond to market demand and development feasibility.	Oppose Rule 17.1A.3.2(b), which requires development within the Medium Density Residential Zone to achieve specified net density outcomes. The submitters consider the district plan should enable higher-density residential development where appropriate, but should not require specific density outcomes to be achieved.
OS179.13	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary	Oppose	Amend Rule 17.1A.3.2(r) so that the 25 metre setback requirement does not apply to boundaries adjoining Rural Residential Zone land or any other adjoining land subject to a deferred urban zoning.	The submitters consider that applying the 25 metre habitable building setback to all Rural Zone boundaries could unnecessarily constrain development and prevent achievement of the densities anticipated within the Medium Density	Oppose Rule 17.1A.3.2(r), which requires a 25 metre habitable building setback from all Rural Zone boundaries. The submitters consider the setback requirement is inappropriate where Medium Density Residential Zone land adjoins

	Activities (Comprehensive Development)			Residential Zone. The submitters consider the setback is not justified where adjoining land is Rural Residential Zone land or land identified for future urban development, as the reverse sensitivity effects the rule seeks to address are unlikely to occur in those situations.	Rural Residential land or land that is subject to a deferred urban zoning, as reverse sensitivity effects are unlikely to arise in those circumstances.
OS179.14	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Delete Rule 17.1A.3.2(t) and any associated matters of discretion.	The submitters consider the rule places unnecessary costs on applicants by requiring acoustic assessments to address low-level reverse sensitivity effects associated with low-speed roads. The submitters do not consider the level of risk warrants the additional assessment requirements or associated costs imposed by the rule.	Oppose Rule 17.1A.3.2(t), which requires an acoustic assessment to accompany applications for Comprehensive Development within the Medium Density Residential Zone where the land is subject to the Road Traffic Noise Overlay. The submitters consider the rule imposes unnecessary assessment requirements and costs to address low-level reverse sensitivity risks associated with local roads.
OS179.15	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Oppose	If Council agrees to live-zone the submitters' land as Medium Density Residential Zone, delete T-33b from Schedule 17.14A.	The submitters consider that if the site is rezoned to a live Medium Density Residential Zone there is no need for it to remain identified as a deferred zone location. The deferred zoning framework would no longer apply and retention of T-33b within Schedule 17.14A would be unnecessary.	Oppose inclusion of T-33b within Schedule 17.14A as a deferred zone location if Council accepts the submitters' request to apply live Medium Density Residential zoning to the site. The submitters consider the deferred zoning provisions would no longer be necessary if the site is live zoned.

Hermann Seifried

Submitter 180

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS180.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Amend	Amend the planning maps so that: • T-002 and T-103 are given deferred Medium Density Residential zoning; • the Brightwater Development Area notation is not extended over T-104a and T-104b; or alternatively • provide live Residential zoning to the submitter's	The submitter considers the supporting assessments do not clearly demonstrate that T-002, T-103 and T-104 can be independently serviced without relying on the same infrastructure upgrades that constrain development of the submitter's deferred residential land. The submitter therefore seeks equivalent development opportunities for that land.	Oppose the proposed live Medium Density Residential zoning of T-002 and T-103 and the extension of the Brightwater Development Area over T-104a and T-104b unless equivalent development opportunities are provided to the submitter's deferred residential land at 77 Lord Rutherford Road North. The submitter considers it inequitable for other Brightwater growth areas to receive live zoning and intensification opportunities when they appear to rely on the same water and wastewater infrastructure upgrades as the submitter's deferred residential land.

			land at 77 Lord Rutherford Road North.		
OS180.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Bring forward the water supply and wastewater infrastructure works identified in Schedule 17.14A as much as possible.	The submitter considers earlier delivery of infrastructure would enable deferred residential land and other growth areas in Brightwater to contribute to housing supply sooner and better respond to future growth demands.	Support the identified water supply and wastewater infrastructure upgrades required to service residential growth in Brightwater but seek earlier delivery of those upgrades.
OS180.3	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Support	Retain the proposed indicative road connection as shown on Area Map 80-02	The submitter considers the indicative road connection will provide future access to and from the Katania Heights area and reduce vehicle movements through the existing Katania Heights cul-de-sac	Support the proposed indicative road connection between Jeffries Road and Coppermine Crescent shown on Area Map 80-02.
OS180.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Amend	Amend Zone Map 80-29 to extend Residential zoning over the hill country land identified in Figure 4 of the submission	The submitter considers: • the land has similar topography and amenity characteristics to the developed Katania Heights area; • servicing appears available from the Coppermine Crescent frontage; • the land is identified as LUC 6 and is not Highly Productive Land; • the land adjoins identified growth areas and is broadly consistent with the Future Development Strategy and proposed TRPS Change 1; and • residential zoning would assist in delivering the proposed indicative road connection and future residential growth.	Seek extension of Residential zoning over the hill country land behind the irrigation dam at Lord Rutherford Road South. The submitter considers this land would provide a logical extension to the existing Katania Heights residential area and facilitate the future indicative road connection between Jeffries Road and Coppermine Crescent

Planscapes (NZ) Ltd

Submitter 182

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS182.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Delete Rule 17.1A.3.2(a)(ii).	Visual differentiation is subjective, the rationale for requiring varied forms and finishes is unclear, and the threshold of four or more dwellings appears arbitrary.	Opposes the medium density design requirement for visual differentiation between dwellings. Considers visual differentiation to be subjective, questions whether consistent building forms and finishes are always a poor outcome, and considers it unclear why the requirement applies only to developments containing four or more dwellings.
OS182.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building	Support	Retain Rule 17.1A.3.1(n) as notified.	The revised Sunday daytime noise limits are more appropriate and less	Supports the proposed daytime noise limits applying on Sundays in the Medium Density Residential Zone and equivalent provisions elsewhere. Considers the previous approach, which

	Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)			restrictive than the existing rule framework.	effectively applied night-time limits during Sunday daytime hours, to have been unnecessarily restrictive.
OS182.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Delete Rule 17.1A.3.2(q).	The matters addressed by the rule are often beyond an applicant's control and therefore provide little practical planning benefit.	Opposes the requirement relating to space on the road for refuse and recycling bins. Considers the arrangement of existing footpaths and kerbs, and any ability to alter them, to be outside the control of applicants undertaking brownfield development, limiting the usefulness of the provision.
OS182.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Amend Rule 17.1A.3.2(r) so that rural setbacks do not apply where boundaries are shared with Rural Residential Zone land or deferred urban zoned land. Apply equivalent changes to corresponding Residential Zone provisions	The setback requirement may unnecessarily restrict residential development opportunities and limit achievement of intended development densities.	Opposes the application of rural setback requirements where Medium Density Residential Zone land adjoins Rural Residential Zone land or deferred urban zoned land. Considers the setback requirement may constrain reasonable residential development and undermine achievement of anticipated residential densities.
OS182.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Amend Rule 17.1A.3.2(w) to clarify how the sufficient capacity requirement is to be interpreted and applied.	The provision lacks clarity regarding whether on-site detention can be used to satisfy the capacity requirement	Opposes the wastewater disposal provision to the extent that it is unclear whether the requirement for "sufficient capacity" can be achieved through on-site detention measures, including those required within the Richmond MDRZ.
OS182.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Amend Rules 17.1A.3.2(x)-(za) to clarify the intended relationship between on-site detention and network capacity requirements.	The provisions appear to anticipate on-site detention but do not clearly explain how this should be assessed in relation to infrastructure capacity and consenting requirements.	Opposes the stormwater provisions to the extent that they do not clearly recognise the role of on-site detention. Seeks clarification of Council's interpretation that on-site detention requirements indicate insufficient reticulated network capacity and therefore trigger the need for a stormwater discharge consent.
OS182.7	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Amend Schedule 17.1AA to provide greater clarity, simplify the assessment framework, and reduce subjective assessment criteria.	The matrix contains subjective criteria, may create uncertainty and additional costs, and may be difficult to apply consistently.	Schedule 17.1AA Design Matrix
OS182.8	Proposed Plan Change No. 81 > Maps > Area Maps > 07 - Proposed PC81 - Area - Mapua, Seaton Valley Rd	Oppose	Delete the Services Contributions Overlay from Update Area Map 80-07 and delete the associated provisions in Chapter 16.5.	The overlay and associated provisions are considered redundant and present an opportunity for plan simplification.	Opposes retention of the Services Contributions Overlay and associated Chapter 16.5 provisions, considering them to be redundant, particularly in light of the changes proposed through PC81.
OS182.9	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words	Oppose	Amend the definition of "Comprehensive Development" to provide greater clarity.	The differing thresholds add unnecessary complexity and create uncertainty regarding the treatment of existing dwellings	Opposes the definition of "Comprehensive Development" to the extent that it applies different dwelling thresholds in Residential and Medium Density Residential Zones and does not clearly explain how existing dwellings on a site are treated.
OS182.10	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.3 Visual and Aesthetic Character	Oppose	Amend Policy 5.3.3.1.	The policy is unclear and does not adequately explain the relationship between medium density development outcomes and maintaining low to medium density character.	Opposes Policy 5.3.3.1 on the basis that the wording is unclear and internally inconsistent, as it seeks to maintain low to medium density character while also providing for higher density development within the Medium Density Residential Zone. Concerns are also raised that Medium Density Residential does not appear to be defined.
OS182.11	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development	Oppose	Delete Policies 6.1.3.1 and 6.15.3.21.	The policies duplicate detailed design matters already addressed through the Design Matrix and are not considered necessary as policy direction.	Opposes the policies requiring a range of building forms and finishes for developments containing four or more dwellings. Considers this matter is more appropriately addressed through the Design Matrix rather than at the policy level

OS182.12	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.1 Sustainable Urban Design and Development	Oppose	Delete Policies 6.1.3.1 and 6.15.3.21.	The policies duplicate detailed design matters already addressed through the Design Matrix and are not considered necessary as policy direction.	Opposes the policies requiring a range of building forms and finishes for developments containing four or more dwellings. Considers this matter is more appropriately addressed through the Design Matrix rather than at the policy level.
OS182.13	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	Amend Policies 6.3.3.1A and 6.3.3.1B to clarify their application and relationship with deferred zoning provisions.	The intended scope and effect of the policies is uncertain, particularly in relation to deferred urban land.	Opposes the policies to the extent that it is unclear whether they apply to deferred-zoned land and how they interact with more specific provisions that apply to deferred urban areas.
OS182.14	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Amend Issue 6.4A.1 to clarify the provision.	The relevance of referencing Nelson City's housing needs is unclear.	Opposes the reference to meeting Nelson City's housing needs within Issue 6.4A.1 and questions its relevance to the provision.
OS182.15	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Amend Objective 6.4A.2.2 to provide greater clarity.	Key concepts within the objective are ambiguous and difficult to interpret.	Opposes Objective 6.4A.2.2 to the extent that it is unclear what is meant by a well-functioning urban environment responding to the desirability of market-driven variation in land prices.
OS182.16	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	Amend the provisions to remove minimum density requirements.	Density outcomes should respond to market demand, and requirements to justify lower densities create unnecessary cost and complexity without influencing development outcomes.	Opposes the provisions that require or promote minimum residential densities. While supporting the enabling of higher residential densities, the submitter considers that mandating minimum densities is unlikely to result in increased density where market demand is absent and will impose additional compliance costs on applicants.
OS182.17	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.6 Land for Commercial Activities	Oppose	Delete Policy 6.6.3.3 and Table 16.6A and instead align commercial hierarchy provisions with zoning through a future full plan review. In the alternative, amend the provisions to provide greater clarity.	The hierarchy is unclear, overlaps with other terminology, and is difficult to understand and implement.	Oppose Policy 6.6.3.3 and Table 16.6A (the proposed commercial hierarchy framework) on the basis that it is confusing, contains overlapping terminology, and does not clearly relate to zones and associated rules. Notes that the provisions indicate maps will show the new hierarchy terminology, but this does not appear to have occurred.
OS182.18	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.7 Settlement Urban And Rural Centre Character, and Design and Development	Oppose	Amend the provisions to clarify the role and meaning of Rural Centres and how they relate to the commercial hierarchy.	The provisions lack clarity and do not adequately define key concepts.	Opposes the provisions relating to Urban and Rural Centre Character to the extent that the concept of Rural Centres is not clearly defined and its relationship to the proposed commercial hierarchy is uncertain.
OS182.19	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.10 TAkaka > 6.10.1 Issues	Oppose	Amend Policy 11.1.3.7 to clarify the meaning of "off-site facilities" and provide clearer direction regarding when parking and on-site turning are required.	The policy is ambiguous and may create uncertainty regarding parking and transport infrastructure expectations.	Opposes Policy 11.1.3.7 to the extent that the term "off-site facilities" is unclear and may be intended to refer to on-street facilities. Also seeks clarification that parking and on-site turning facilities are not required in all circumstances.
OS182.20	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.10 TAkaka > 6.10.1 Issues	Oppose	Amend Policies 11.1.3.13 and 11.1.3.14 as necessary to reflect amendments elsewhere in the plan and correct drafting errors.	The provisions may require updating to maintain consistency and accuracy.	Opposes the policies to the extent that consequential amendments may be required if electric vehicle charging and end-of-trip facility provisions are amended, and notes the presence of a typographical error.
OS182.21	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic)	Oppose	Amend Rule 16.2.2.1(a) to clarify its application and correct drafting errors.	The requirement may be unnecessarily restrictive and is not clearly drafted.	Opposes Rule 16.2.2.1(a) because it requires formation of an access even where no on-site parking is provided and contains a typographical error.
OS182.22	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic)	Support	Amend Rule 16.2.2.1(ab) to clarify the applicable standard, or alternatively delete the requirement.	The provision lacks clarity and may create unreasonable redevelopment constraints.	Supports the intent of providing greater clarity around private access standards for developments with more than six users but considers the provision unclear as to which NTLDM standard applies and potentially too onerous for brownfield redevelopment.

OS182.23	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic) > 16.2.2 Land Use	Oppose	Amend Rule 16.2.2.1(ac) to replace "new" with "additional" vehicle crossings.	The terminology is inconsistent with other provisions and appears to be a drafting error.	Opposes the drafting of Rule 16.2.2.1(ac) because it refers to "new" vehicle crossings instead of "additional" vehicle crossings, creating inconsistency with other provisions.
OS182.24	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic) > 16.2.2 Land Use	Oppose	Delete Rule 16.2.2.3(k)-(m), or amend the provisions to make them less prescriptive.	The requirements are inflexible and may not provide outcomes that reflect user demand or development circumstances	Opposes the cycle parking and end-of-trip facility requirements. Considers them overly prescriptive, onerous, and often poorly aligned with actual user requirements, resulting in unnecessary resource consent applications for alternative solutions.
OS182.25	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic) > 16.2.2 Land Use	Oppose	Amend Rule 16.2.2.3(q) so that the requirement applies only where appropriate and clearly defines charging capability.	The requirement may be unnecessarily onerous in some circumstances and lacks sufficient certainty.	Opposes the electric vehicle charging capability requirement to the extent that it applies broadly beyond comprehensive developments and lacks clarity regarding what constitutes charging "capability".
OS182.26	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Oppose	Amend Rules 16.3.3A.2(b) and 16.3.3A.4(b) to require subdivision to be "capable of achieving" the specified density.	The current wording may not appropriately accommodate super-lot subdivision approaches.	Opposes the wording of the minimum density subdivision provisions and seeks amendment so that subdivision need only be capable of achieving the required density, rather than necessarily achieving it at the subdivision stage.
OS182.27	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.4 Residential Activities and Community Facilities	Oppose	Delete Policy 5.2.3.8A, Rule 16.3.3A.2(j), and Rule 17.1A.3.2(t).	The provisions create unnecessary compliance costs and are not justified by identified effects.	Oppose provisions (5.2.3.8A, Rule 16.3.3A.2(j), and Rule 17.1A.3.2(t)) requiring acoustic assessments for road noise. Considers they will impose unnecessary costs on applicants to address low-level reverse sensitivity risks, are inequitable because comparable existing residential areas are not subject to the same requirements, and are not supported by evidence of existing reverse sensitivity issues
OS182.28	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Oppose	Amend Rules 16.3.3A.2(p) and (q) to clarify their scope and application.	The intended application of the provisions is uncertain.	Opposes Rules 16.3.3A.2(p) and (q) to the extent that it is unclear whether they apply only to sites containing heritage items or have a wider application.

Annette Le Cren Geoffrey Vause

Submitter 183

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS183.1	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.20 Methods of Implementation	Amend	The council should add the in purple text to the following 5.2.20.3 Works and Services, Landscape planting, including increasing the tree cover within street corridors and other public land areas in the Medium Density Residential Zone to, at least, offset any loss of tree cover from private land. The baseline for judging loss of tree cover shall be the tree cover prior to the implementation of PC81.	Increasing the tree cover requires establishing a baseline tree cover. The temptation of developers will be to removed tree cover prior to subdividing, thus the baseline needs to be established before rezoning occurs.	The submitter wants the council to amend section 5.2.20.3 to require increasing tree cover in street corridors and public land in the Medium Density Residential Zone. They propose using tree cover before PC81 as the baseline to measure loss. This aims to prevent developers from removing trees before rezoning to avoid offsets.
OS183.2	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.4	Amend	**The council should refuse this Change**		The submitter seeks to **replace clause 5.4.3.1** with a stronger planning requirement.

	Residential Activities and Community Facilities > 5.4.3 Policies		5.4.3.1 To allow for health care, educational and cultural facilities and other local community activities, including in~~residential~~ urban areas, providing these do not compromise the character or amenity of the ~~residential neighbourhood~~ urban environment. **and replace it with** **5.4.3.1 To plan the infrastructure required to meet the health care, educational, energy, communication and cultural growth needs of the community. This planning requirement must be a criterium for the lifting of a zoning deferment that will increase the density of dwellings in that zone (see 6.3.2.4)**	In terms of planning, it is inadequate is simply "allow" for infrastructure. The identified infrastructure is essential for the health and welfare of the community and to permit a significant increase in the population of residents in an urban area (e.g. Mapua) without at least planning for the request services infrastructure is ludicrous. If the TRMP is to assure that it meets its own requirements as in 5.4.1.1 then 5.4.3.21 then change 5.4.3.21 must be deleted and replaced with our proposal. Our proposed change will require a modification to the deferment lifting process, in particular defining, within the TRMP, the actual process for deferment lifting and expansion of the criteria for lifting. Note that we are not stipulating that the Council provides the infrastructure for these services or the services themselves, merely that it set in place plans for the development of these services in conjunction with service providers, in order to meet the requirement of the increased population before deferment lifting. This will require the Council to engage and co-ordination with the providers of these services.	They want the council to **plan infrastructure** for health, education, energy, communication, and cultural needs before increasing residential density. They argue that simply "allowing" infrastructure is inadequate. The proposal calls for clear criteria and a defined process to lift zoning deferments, ensuring services meet population growth needs. The council would coordinate with service providers but not necessarily deliver the services.
OS183.3	2-Out of Scope	Amend	**The council should amend objectives as follows (additions in purple)** *6.3.2.3 Development within deferred zones is appropriately sequenced* ***in an explicit transparent process, independent of developer bias, that includes, as essential criteria, planning to meet all the infrastructure needs of the increased population resultant from the lifting of a deferment*** *so that it provides:* *(a) a safe, well-connected and legible transport network that integrates with the surrounding transport network and local facilities, that* ***plans for the provision of arterial transport network that assures capacity to meet the transport needs of the residents of any development*** *and* ***tha****t enables active and public modes of transport and a shift to renewable energy sources; and* *(b) necessary servicing infrastructure (water, wastewater stormwater, power and* ~~*internet*~~ ***digital communications****) that is*	We are in full support of the Council's use of the deferment process to permit a staging of land development. This is a critical mechanism that, in its current form, provides for development based on developer's wants and does not reflect population need. Given that need for housing (a complex supply and demand equation) has been determined as central to the TRMP, FSD and LTP then any deferment must consider need. The current process of deferment lifting is ill defined, other than for the proposed PC81 6.3.3.1C and 17.14.2.2 which are limited largely to water and local traffic infrastructure. They are also confusing (see our Seaton Valley Road example below). Thus a process for lifting of deferment needs to be designed and established in order that any decision is seen to be transparent and free from commercial bias especially from developers. Currently the lifting of deferment is initiated by developers and the Council (17.14.2.2) This does	The submission supports council's deferment process but calls for clearer, transparent criteria based on population need, not developer interests. It seeks amendments to ensure infrastructure (water, transport, power, digital, social, health, schools) fully supports growth without degrading existing services. A technocrat panel should assess deferment lifting applications publicly, using defined criteria to manage staged development responsibly and avoid bias.

			provided so that it integrates with adjoining land and surrounding networks, ***that does not degrade the provision of the services to existing resident ratepayers*** *and that minimises adverse effects on the natural and built environment; and*
			
			(c) ~~*where relevant,*~~ *appropriate access to additional infrastructure, including public open space, community infrastructure and social infrastructure (schools and health facilities) that is necessary for a well-functioning urban environment*
			
			6.3.2.4 The following deferment lifting process will be used for determining whether a deferment will be lifted on any deferred zone land for development
			
			A panel of technocrats, one from each of the criteria realms, will judge each deferment application from developers against the criteria. The panel will be supported by the providers from the criteria realms, and the panel deliberations and findings must be available to the public. There must not be any degradation of existing services to resident ratepayers in the urban or rural zone
			
			Criteria:
			
			• ***Need. [i] (This will require developing a methodology for assessing need. The referenced paper provides possible mechanisms for this. Consideration will need to be made to restrict rental properties to long term rental to avoid the Airbnb and similar short-term rentals distorting the true need.)***
			• ***There is sufficient infrastructure capacity to meet the needs of the population increase resultant from deferment lifting for***
			  • ***Water services***
			  • ***Traffic infrastructure capacity in the immediate area of the deferment lifting and in the wider province area, especially the main arterial roots. This is essential to provide easy access to workplace and schooling that was identified by TDC planner Jeremy Butler in 2021:[ii] Additionally ambulance access to Nelson Hospital must also be considered.***
			  • ***Power/electricity provision, including lines capacity with due consideration for technological changes in solar, other***
				not reflect need, rather whether a developer has acquired land, has sufficient investment for developing or has agreed with the Council to provide the infrastructure.
				
				Throughout the TRMP the deferment mechanism is used to allow for a timeline of development by control of infrastructure provision by the council. A "trigger" is described which once activated, will lift the deferment. However, there is no "trigger" defined which initiates the actual provision by the Council of the infrastructure, other than an agreement being reached between the Council and a developer to develop the land.
				
				The scope of Council infrastructure planning is limited to only two realms of the services required for a healthy community and ignores power, digital communications, health services and does not even mention social services. It also fails to consider degradation of residential ratepayers existing non water, non-traffic services resultant from development.
				
				Thus, an explicit and transparent deferment lifting mechanism must be developed to encompass not only need, but also all the services necessary for a healthy community.	

			renewables and demand from electric vehicle home charging. • ***Digital communications with due consideration of the adverse effects of a large population increase in a small area on wireless, cellular and satellite broadband.*** • ***Clearly established planning is in place to provide for the population needs in the following realms*** • ***Schooling.*** • ***Health services.*** • ***Social services.***		
OS183.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.3 Policies	Amend	**Support 6.3.3.1 as follows:** *6.3.3.1 To ensure that utilities and services are adequate to avoid, remedy, or mitigate adverse effects of urban development and population growth on both existing and future urban areas.* **Amend policy 6.3.3.1A** ~~*6.3.3.1A Recognise that residential intensification can require the upgrade of infrastructure that may not be programmed, requiring developer-led or temporary solutions to achieve, at least, minimum sufficient residential capacity at objective 6.2.2.3.*~~ *6.3.3.1A Recognise that residential intensification can require the upgrade of infrastructure that may not be programmed. The Council remains responsibility to plan for upgrades in a manner that assures there is no degradation of service supply to existing resident ratepayers.*	We are in full support of the Council's use of the deferment process to permit a staging of land development. This is a critical mechanism that, in its current form, provides for development based on developer's wants and does not reflect population need. Given that need for housing (a complex supply and demand equation) has been determined as central to the TRMP, FSD and LTP then any deferment must consider need. The current process of deferment lifting is ill defined, other than for the proposed PC81 6.3.3.1C and 17.14.2.2 which are limited largely to water and local traffic infrastructure. They are also confusing (see our Seaton Valley Road example below). Thus a process for lifting of deferment needs to be designed and established in order that any decision is seen to be transparent and free from commercial bias especially from developers. Currently the lifting of deferment is initiated by developers and the Council (17.14.2.2) This does not reflect need, rather whether a developer has acquired land, has sufficient investment for developing or has agreed with the Council to provide the infrastructure. Throughout the TRMP the deferment mechanism is used to allow for a timeline of development by control of infrastructure provision by the council. A "trigger" is described which once activated, will lift the deferment. However, there is no "trigger" defined which initiates the actual provision by the Council of the infrastructure, other than an agreement being reached between the Council and a developer to develop the land.	Submitters seek amendments to policies 6.3.3.1 and 6.3.3.1A to ensure utilities and services meet urban growth needs without degrading existing residents' services. They support staged land development but call for a clear, transparent deferment lifting process based on housing need, not developer interest. They highlight current gaps, including limited infrastructure scope and lack of triggers for Council-led upgrades, urging inclusion of all essential community services in planning.

				The scope of Council infrastructure planning is limited to only two realms of the services required for a healthy community and ignores power, digital communications, health services and does not even mention social services. It also fails to consider degradation of residential ratepayers existing non water, non-traffic services resultant from development. Thus, an explicit and transparent deferment lifting mechanism must be developed to encompass not only need, but also all the services necessary for a healthy community.	
OS183.5	2-Out of Scope	Amend	**The council should amend (in purple) the following change** *17.14.2.2 Deferred land listed in Schedule 17.14A* *(b) If the infrastructure required as stated in Schedule 17.14A, Column D is delivered then the relevant provisions of Column G of Schedule 17.14A apply, after the proposed development has been approved through the Deferment Lifting process in* 6.3.2.4 *For the purpose of rule 17.14.2.2, 'delivered' means infrastructure is:* *(i) Physically constructed, or* *(ii) Or Council and a landowner or developer have an agreement that the infrastructure will be constructed within three years of the date of the agreement, and* *(iii) Council's Chief Executive Officer has published notice on the Council's website that (i) or (ii) has been satisfied.*	We are in full support of the Council's use of the deferment process to permit a staging of land development. This is a critical mechanism that, in its current form, provides for development based on developer's wants and does not reflect population need. Given that need for housing (a complex supply and demand equation) has been determined as central to the TRMP, FSD and LTP then any deferment must consider need. The current process of deferment lifting is ill defined, other than for the proposed PC81 6.3.3.1C and 17.14.2.2 which are limited largely to water and local traffic infrastructure. They are also confusing (see our Seaton Valley Road example below). Thus a process for lifting of deferment needs to be designed and established in order that any decision is seen to be transparent and free from commercial bias especially from developers. Currently the lifting of deferment is initiated by developers and the Council (17.14.2.2) This does not reflect need, rather whether a developer has acquired land, has sufficient investment for developing or has agreed with the Council to provide the infrastructure. Throughout the TRMP the deferment mechanism is used to allow for a timeline of development by control of infrastructure provision by the council. A "trigger" is described which once activated, will lift the deferment. However, there is no "trigger" defined which initiates the actual provision by the Council of the infrastructure, other than an agreement being reached between the Council and a developer to develop the land.	Submitters support the Council's deferment process for staged land development but seek amendments for clarity and transparency. They want the lifting of deferment to consider actual housing need, not just developer readiness or agreements. The current process focuses narrowly on water and traffic infrastructure, ignoring other essential services like power, health, and social support. They urge a clear, unbiased trigger and a broader infrastructure scope for lifting deferments to ensure community wellbeing.

				The scope of Council infrastructure planning is limited to only two realms of the services required for a healthy community and ignores power, digital communications, health services and does not even mention social services. It also fails to consider degradation of residential ratepayers existing non water, non-traffic services resultant from development. Thus, an explicit and transparent deferment lifting mechanism must be developed to encompass not only need, but also all the services necessary for a healthy community.	
OS183.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Ensure any lifting of deferred zoning or future urban development is contingent on adequate wastewater infrastructure capacity being available.	Existing sewerage infrastructure may not have capacity to support the level of growth anticipated through PC81.	Opposes further urban development in Mapua unless sufficient wastewater infrastructure capacity is available. States there are known concerns regarding the ability of the sewerage system between Mapua and Rabbit Island to accommodate long-term population growth and that these infrastructure constraints should be addressed before deferred residential land is developed.
OS183.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Amend PC81 to ensure planned residential growth is aligned with sufficient arterial transport capacity and supporting transport infrastructure for outlying urban areas.	Residents of settlements such as Mapua are highly dependent on travel to Richmond and Nelson for employment, education, and services. Housing growth should be supported by a transport network capable of accommodating increased travel demand.	Opposes the focus on local transport infrastructure improvements without sufficient consideration of the wider arterial transport network. Considers that growth in outlying urban settlements such as Mapua will increase travel demand on routes connecting those settlements with Richmond and Nelson and that transport planning should address these wider network effects.
OS183.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Require greater consideration of electricity supply and telecommunications infrastructure capacity when planning for urban growth.	Electricity and digital communications are essential infrastructure that support modern residential living and may not have sufficient capacity to accommodate significant population growth.	Opposes urban growth proceeding without adequate consideration of electricity and telecommunications infrastructure. Raises concerns regarding electricity network constraints, limitations on solar export capacity, limited fibre availability, and constrained cellular broadband performance in parts of the Mapua area.
OS183.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Oppose	Amend PC81 to recognise and plan for the growth-related demands on health, education, community and social services, particularly in Mapua.	Significant population growth will increase demand for health, education and community services. Failure to plan for these services may undermine community wellbeing and create pressure on existing facilities and service providers.	Opposes the lack of planning for community, health, education and social infrastructure associated with the significant population growth proposed through PC81. Considers that the plan focuses primarily on three waters and transport infrastructure while giving insufficient consideration to services necessary to support community wellbeing.

Richmond Pōhara Holdings Ltd

Submitter 184

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS184.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	• Rezone a portion of the submitters land in Pohara to Residential and open space as per the map included in original submission. • That the Section 32 report analyses the effectiveness of the plan's methods at implementing the existing urban growth objectives and policies and Eastern Golden Bay objectives and policies and identifies reasonably practical options for achieving these. Refer to original submission for more information.	The submitter states that the land forms part of an area previously identified for future development in Pōhara, supports urban growth in the settlement, and considers the rezoning would implement the existing Eastern Golden Bay objectives and policies in the Tasman Resource Management Plan. Refer to original submission for more information.	Opposes Plan Change 81 because it does not provide for additional urban growth in Pōhara and seeks rezoning of part of the submitter's Rural 2 land to Residential Zone.
OS184.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Rezone to Open Space Zone the portion of the submitter's land shown on the rezoning plan attached to the original submission.	The submitter seeks Open Space zoning for the gully and associated areas shown on the rezoning plan. Refer to original submission for more information and map.	Seeks rezoning of part of the submitter's land to Open Space Zone. Refer to the original submission for map.
OS184.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.11 Takaka-Eastern Golden Bay	Oppose	Amend Plan Change 81 to provide for additional urban growth opportunities in Pōhara. Refer to original submission for more information.	The submitter states that Plan Change 81 provides urban growth opportunities in other locations but does not provide for growth in the Pōhara settlement despite existing Eastern Golden Bay policy provisions. Refer to original submission for more information.	Opposes the lack of urban growth provision for the Pōhara coastal settlement in PC81.
OS184.4	2-Out of Scope	Oppose	If Council rejects relief sought by the submitter, that a timeline be put in place for introducing Plan changes that give effect to the Policies for Eastern Golden Bay, including those specific policies that address Pōhara.	The submitter considers that planning provisions should provide a pathway and timeframe for future residential growth in Pōhara if the requested rezoning is not approved.	Seeks a commitment to future planning work if the requested rezoning is not accepted.
OS184.5	2-Out of Scope	Amend	If Council rejects relief sought, that following Royal assent to the new Planning legislation, the Planning and Natural Environment Bills, direction is given to Council staff to consult the submitter, at the outset of the Regional Spatial Plan preparation, on their spatial planning requirements for their landholding to provide for residential growth together with provision for Open Space Zoning including protection of riparian areas and consideration of public access through the gully area, together with considering the longer term needs for a Local Commercial Centre for Pōhara.	The submitter wishes to be involved in future spatial planning processes affecting its landholding and future growth options in Pōhara. Refer to original submission for more information.	Seeks consultation with the submitter during future Regional Spatial Plan preparation if the requested rezoning is not approved.

Tahimana Ltd

Submitter 185

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS185.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.7 Rural 3 Zone Rules	Oppose	Ensure PC81 and related TRPS provisions continue to recognise that residential development is already anticipated within Rural 3 and Rural Residential zones.	The Rural 3 Zone was deliberately created to provide rural-residential and residential opportunities. Existing TRMP objectives and policies (e.g., 7.2.2.2, 7.2.3.2, 7.3.3.1) already support residential development in Rural 3. PC81 should not inadvertently undermine or cast doubt on this established planning framework.	The submitter is concerned that PC81 and associated TRPS amendments may unintentionally imply that residential development should only occur within urban environments or Future Development Strategy areas, despite the operative TRMP already anticipating residential development within the Rural 3 Zone.
OS185.2	2-Out of Scope	Oppose	Amend relevant TRPS issues, objectives, policies, implementation methods, monitoring indicators, and anticipated environmental results to explicitly acknowledge Rural 3 and Rural Residential zones as anticipated residential areas.	Without explicit recognition, Rural 3 could become "orphaned" in the regional policy framework, creating uncertainty for landowners and decision-makers despite the operative TRMP clearly enabling residential development in these zones.	The submitter considers that PC81-related TRPS amendments may create uncertainty or a "policy gap" for Rural 3 areas by focusing heavily on urban environments and FDS areas, without acknowledging existing rural zones that already provide residential capacity.
OS185.3	2-Out of Scope	Oppose	Refine PC81-related TRPS amendments to ensure they do not create unintended limitations on Rural 3 residential development.	There is no evidential basis for introducing policy changes that indirectly discourage Rural 3 development, which is already planned for and enabled under the operative TRMP.	Although Council's s32 report states rural subdivision is outside the scope of PC81, the submitter is concerned that proposed TRPS amendments may indirectly constrain development opportunities already anticipated in Rural 3.
OS185.4	2-Out of Scope	Amend	Amend Policy 7.2.3.13 to include a statement recognising the benefits of well-designed private and communal wastewater systems.	Private and communal systems can be effective and appropriate in Rural 3 areas. The policy should not inadvertently discourage them where they are well-designed and environmentally sound.	PC81 introduces a new wastewater policy (7.2.3.13) requiring avoidance of adverse off-site effects from domestic wastewater disposal. The submitter supports the intent but seeks explicit recognition of well-designed private and communal wastewater systems.

Nicholas Hughes

Submitter 186

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS186.1	2-Out of Scope	Oppose	remove 8 week rule.	The proposal put forward by the previous community board needs to heard please . It is a breach of our human rights to shelter to act on this piece of legislation in my opinion. It was brought in as a weapon many years ago and needs to be updated. Thanks for considering this .	I would like to place a submission for TDC to consider. We desperately need to have the 8 week removed or altered to allow people's without the financial ability to buy a house to be able to live in tasman without fear of police raids or having surveillance placed on them simply to see if they are on one place for more then 8 weeks . We understand this relates to the TRMP Definition of a building (g), which Plan Change 81 is not proposing to amend.

William Harrington

Submitter 187

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS187.1	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone > 16.3.3A.6 Non-Complying Activity Subdivision (Medium Density Residential Zone)	Oppose	Include a controlled or restricted discretionary subdivision rule for standard density development on sites less than 1000m² that does not have to go through the urban design matrix.	The submitter considers the proposed non-complying activity status and comprehensive development requirements are unnecessarily complex and costly for small sites, which could discourage small-scale infill development and reduce housing supply opportunities contrary to the intent of the plan change.	The submitter supports protecting larger development sites from inefficient subdivision but opposes the proposed non-complying activity status for standard density subdivision on smaller sites. They consider that sites under approximately 1,000m² should retain a simpler subdivision pathway, such as a controlled or restricted discretionary activity status. The submitter is concerned that requiring all development to comply with the urban design matrix and comprehensive development provisions will be overly complex and costly for small-scale infill projects. They consider this will discourage "mum and dad" style infill development, reduce housing delivery opportunities, and undermine one of the objectives of the plan change.
OS187.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Implementation testing and rationalising the density rules and definitions.	The density requirements are still particularly confusing across the board i.e. standard density, comprehensive density etc and as an example this RDA rule 17.1A.3.2.	The submitter considers the proposed density provisions to be confusing and difficult to interpret. They specifically identify uncertainty around the distinction between standard density and comprehensive density development and cite Rule 17.1A.3.2 as an example of the complexity.
OS187.3	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Amend	Undertake a much more robust review from an implementation perspective, either through more extensive road testing by the TDC consents team or external consultants experienced in implementing the rules, and publish this report for use by submitters and any commissioners.	I do not have enough spare time to go through everything but from a general read through I strongly suggest TDC does a much more robust review from an implementation perspective, either through more extensive road testing by their consents team or external consultants experienced in implementing the rules in reality. As an example, there appear to be matters which will raise uncertainty and debate tied to activity statuses (e.g. debate over matters in the urban design points system) which need to be black and white or will just create legal debate and more complicated consenting processes.	The submitter considers that the draft plan requires more rigorous testing from an implementation and consenting perspective. They are concerned that some provisions, particularly those relating to activity status assessments such as the urban design points system, lack sufficient clarity and could lead to uncertainty, interpretation disputes, legal challenges, and more complex consent processes.

MLC Group Ltd T/A Genia

Submitter 188

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS188.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.9 Motueka	Support	No decision sought.	N/A.	Support any measures that improve residential land availability and affordability in and adjacent to Motueka.

Alan Atkins

Submitter 189

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS189.1	Proposed Plan Change No. 81 > Maps > Area Maps > 10 - Proposed PC81 - Area - Motueka, Cnr Motueka Valley Hwy - College St	Oppose	Remove the Indicative Walkway or move it to the property to the east which will place the walkway on the other side of the ridge with excellent views over Motueka and Tasman Bay	The proposed walkway would constrain future development opportunities on the property by affecting the most suitable building locations. The route does not appear to offer notable scenic or recreational value, reducing the justification for its placement in the proposed location.	The submitter, a trustee of the property at 45 Motueka Valley Highway, opposes the proposed indicative walkway shown on the Area Map update. They state that the route passes through two of the property's three most suitable potential building platforms and would adversely affect future development opportunities. They also contend that the proposed route does not provide worthwhile views.

Jenny and Bruce Tyne and Thorpe

Submitter 190

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS190.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Oppose	9. Reject the proposed High Density Intensive Development Precinct at 120 Wensley Road. 10. Reject the proposed Medium Density Residential zoning of 9 Aratia Way. 11. Adopt a more balanced approach that preserves neighbourhood character, protects residential amenity, and ensures adequate infrastructure capacity.	The submitter seeks to retain the existing low-density residential character and amenity of the area, and to avoid adverse effects associated with higher-density development, including loss of privacy, shading, overlooking, increased traffic, infrastructure pressures, noise, and impacts on neighbourhood character and property enjoyment.	Opposes the proposed rezoning due to concerns about loss of neighbourhood character and amenity, including privacy, shading, overlooking, traffic, infrastructure capacity, construction effects, and the compatibility of high-density development with the existing low-density residential environment.

Trevor Garnett

Submitter 191

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS191.1	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.8 Rural Residential and Closed Zones > 16.3.8.1A Restricted Discretionary Subdivision (Rural Residential Zone - Specific Locations)	Oppose	These two sites in the St Arnaud area are not a good form of development. I believe a better development approach is to allow higher density in St Arnaud. I would love to see more comprehensive development in St Arnaud. The two main reasons I oppose those two areas is rural fragmentation and the increased potential for wildfires. Higher density development is better located within or adjacent to towns subject to the availability of services.	The proposed rule introduces a complex framework of differing minimum and average allotment size requirements across multiple Rural Residential Zone locations, which may be difficult for landowners, applicants, and planners to interpret and implement consistently. The variation in standards between locations creates additional complexity and may result in uncertainty regarding subdivision potential and development outcomes. The submitter considers that the combination of minimum lot sizes, average lot size requirements, and restricted discretionary consent requirements may unnecessarily constrain subdivision opportunities, increase consenting costs, and create barriers to efficient land use without a clear planning justification. A simpler and more consistent approach would improve plan usability, provide greater certainty for landowners and decision-makers, and better support practical implementation of the subdivision provisions while continuing to manage effects relating to geotechnical hazards, amenity, and infrastructure.	The submitter opposes or seeks amendments to proposed Rule 16.3.8.1A (Restricted Discretionary Subdivision in Specific Rural Residential Zone Locations). The rule introduces a restricted discretionary consent pathway for subdivisions in identified Rural Residential Zone areas that do not comply with the minimum allotment size requirements under Rule 16.3.8.1. The proposal establishes different minimum lot sizes and average lot size requirements across several locations, including Pangatotara, Eyles Road, and Little Ōnahau, and requires resource consent where these standards are not met. While the rule provides a mechanism for subdivision below the standard minimum allotment size, applicants must still meet specified minimum and average lot size thresholds and comply with all other subdivision requirements. Council's discretion is restricted to matters such as geotechnical suitability, onsite amenity, access to daylight, and the matters listed in Rule 16.3.8.1. Applications that comply with the rule are to be processed on a non-notified basis. See full submission for recommended amendments.
OS191.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.1 Permitted Activities (Standard Development)	Amend	Make it simple and just have site coverage. It is now established developments need onsite storage of stormwater, so a trade off should be to allow greater site coverage. I'd rather have design go higher but in NZ we are not skilled in designing higher buildings as in Europe or the States. Also we have to consider Earthquakes, Mobility restrictions and the need for Lifts.	A site coverage-based approach would be simpler, more practical, and easier to administer while still managing development effects.	Amend site coverage provisions from 40% to 60%.

OS191.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Replace the Restricted Discretionary Activity status in Rule 17.1A.3.2 with Permitted Activity status where the relevant development standards are met.	The current provisions contain numerous controls and restrictions that act as barriers to development. Developers and landowners are more likely to pursue comprehensive and higher-density development where the process is straightforward and provides certainty of outcome. Permitted activity status would reduce regulatory burden while still allowing development standards to manage effects. The submitter considers that urban growth and housing supply objectives will only be achieved if more forms of development are enabled as permitted activities. Retaining a Restricted Discretionary Activity status risks undermining the intent of the Plan Change by making higher-density development more difficult, costly, and time-consuming to deliver.	Amend Rule 17.1A.3.2 (Comprehensive Development) by replacing "Restricted Discretionary Activity" with "Permitted Activity" status.
OS191.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 54 - Proposed PC81 - Zone - Korere-Tophouse Rd	Oppose	Delete areas	Rural fragmentation and wildfires	Remove site allocations on Tophouse Road from PC81.

Mareena King

Submitter 192

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS192.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	I respectfully request that Council reject the proposed connection to Redmill Road and fully evaluate alternative access arrangements before making a final decision.	I oppose the proposed connection of the new subdivision poff Stringer Road to the existing cul-de-sac at Redmill Road. As a resident of Galeo Road, I am concerned that this proposal will significantly increase traffic volumes, noise, and general disruption throughout what is currently a quiet residential estate The existing road network within the subdivision was designed as a low-traffic residential area, and opening it up as a through-route for additional subdivisions will fundamentally change the character and amenity of the neighbourhood. I am particularly concerned about the increased traffic that will be directed towards the Maisey Road and State Highway 6 intersection. This location has been the site of several serious crashes in recent years, and remains a challenging intersection due to the transition from an 80 km/h zone to a 100 km/h zone a short distance beyond the	**Submission Summary:** The submitter opposes the proposed road connection from Stringer Road to Redmill Road. They request the Council reject this plan and explore alternative access options. Concerns include increased traffic, noise, and disruption in a quiet residential area.

				junction. Increasing traffic movements through this intersection has the potential to exacerbate existing safety concerns. Residents have already experienced issues with speeding vehicles associated with contractors working on developments behind the Galeo Estate. The addition of further subdivisions and increased traffic volumes is likely to worsen these issues and further impact the safety and wellbeing of residents. There is also a broader resilience and emergency management concern. With two additional subdivisions planned behind Galeo Estate, the area will continue to grow while still relying on a single access route in and out of the neighbourhood. The estate is bordered by forestry and was at risk of evacuation during the Pigeon Valley Fires. In an emergency situation, concentrating additional traffic onto one access point could create significant challenges for evacuation and emergency response. For these reasons, I believe Council should carefully reconsider the proposed road connection and investigate alternative access options. In particular, a connection to Old Moutere Highway appears to offer a more logical and strategic solution. Such an option would distribute traffic more effectively, reduce pressure on the Maisey Road intersection, improve network resilience, and minimise impacts on existing residents. In my view, directing additional traffic through an established residential cul-de-sac and funnelling it towards an already constrained and potentially hazardous highway intersection is short-sighted and does not adequately consider long-term traffic safety, community amenity, or emergency access requirements.	Safety risks at the Maisey Road/State Highway 6 intersection may worsen. Emergency evacuation is a concern due to reliance on a single access route. They suggest considering a connection to Old Moutere Highway for better traffic distribution and safety.
OS192.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	I respectfully request that Council reject the proposed connection to Redmill Road and fully evaluate alternative access arrangements before making a final decision.	I oppose the proposed connection of the new subdivision poff Stringer Road to the existing cul-de-sac at Redmill Road. As a resident of Galeo Road, I am concerned that this proposal will significantly increase traffic volumes, noise, and general disruption throughout what is currently a quiet residential estate The existing road network within the subdivision was designed as a low-traffic residential area, and opening it up as a through-route for additional subdivisions will fundamentally change the character and amenity of the neighbourhood. I am particularly concerned about the increased traffic that will be directed towards the Maisey Road and State Highway 6 intersection. This location has been the site of several serious crashes in recent years, and remains a challenging intersection due to the transition from an 80 km/h zone to a 100 km/h zone a short distance beyond the junction. Increasing traffic movements through this intersection has the potential to exacerbate existing safety concerns. Residents have already experienced issues with speeding vehicles associated with contractors working on developments behind the Galeo Estate. The addition of further subdivisions and increased traffic volumes is likely to worsen these issues and further impact the safety and wellbeing of residents.	**Submission Summary:** The submitter opposes the proposed road connection from Stringer Road to Redmill Road. They request Council reject the plan and explore alternative access options. Concerns include increased traffic, noise, and disruption in a quiet residential area. Safety risks at the Maisey Road/State Highway 6 intersection are highlighted due to past crashes. Emergency evacuation challenges are noted, with only one existing access route. A connection to Old Moutere Highway is suggested as a better alternative.

				There is also a broader resilience and emergency management concern. With two additional subdivisions planned behind Galeo Estate, the area will continue to grow while still relying on a single access route in and out of the neighbourhood. The estate is bordered by forestry and was at risk of evacuation during the Pigeon Valley Fires. In an emergency situation, concentrating additional traffic onto one access point could create significant challenges for evacuation and emergency response. For these reasons, I believe Council should carefully reconsider the proposed road connection and investigate alternative access options. In particular, a connection to Old Moutere Highway appears to offer a more logical and strategic solution. Such an option would distribute traffic more effectively, reduce pressure on the Maisey Road intersection, improve network resilience, and minimise impacts on existing residents. In my view, directing additional traffic through an established residential cul-de-sac and funnelling it towards an already constrained and potentially hazardous highway intersection is short-sighted and does not adequately consider long-term traffic safety, community amenity, or emergency access requirements.	

Irene Jolly

Submitter 193

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS193.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 48 - Proposed PC81 - Zone - Richmond, Champion Rd	Oppose	As I said above I don't oppose the objective of more diverse housing. I do understand that Richmond needs more housing. However, My request is that you do not allow tall buildings right next to existing (well established) single-storey homes in Forget-Me-Not Lane. Surely these multi storey developments could be restricted to brand new subdivisions, not existing quaint lanes, like Forget-Me-Not. A development like that would badly damage our daily quality of life and… if our Lane is inundated with more traffic, could put residents' lives in danger .	While I do support the council's strategic objective to provide diverse housing choices. The zone change to Medium Density Residential (as per map 48) on two of the boundaries to my own property at 6 Forget-Me-Not Lane, potentially lacks design protections to preserve my privacy, view and sunlight hours. Specifically If these buildings were to be multi-storey. I am also very concerned about the safety and maneuverability of traffic on our residential Lane. There is already no parking on Champion Road and because of this, many cars, vans, trucks etc who service or visit properties on Champion Road end up parking on the side streets including our very narrow Forget-Me-Not Lane. With Medium Density housing planned in the area the potential impact of more vehicles using our Lane is a huge safety concern. I feel increased on-street parking on Forget-Me-Not Lane will critically reduce driver visibility, restrict road clearance and manoeuvrability for emergency service vehicles. After my husband died in 2011, I made the decision to leave my rural lifestyle and move into Richmond. The reasons I chose 6 Forget-Me-Not Lane, was that I would have a small view of the	The submitter opposes tall, multi-storey buildings next to their single-storey home on Forget-Me-Not Lane. Concerns include loss of sunlight, privacy, and views of Mount Arthur Ranges. They fear increased traffic and on-street parking will reduce safety and emergency access on the narrow lane. They support diverse housing but request restrictions to protect established residents' quality of life and neighborhood character.

				mountains, all day sun, and it was very private. I was also happy that there was a low amount of traffic with good pedestrian safety, and access for emergency vehicles, these things were all very important to me. The house I planned and subsequently got built on this section was specifically placed for privacy, maximum sunlight and the small view of the Mount Arthur range. Plus I enjoyed the fact that my street was safe for vehicles, drivers and pedestrians. I am now 86 years old and have loved living here in this safe small Lane for just over 14 years. I fear the sun, the view and the privacy I enjoy everyday in my lovely home will be severely hindered by the possibility of having 2 or 3 storey housing on two of my boundaries. I also fear Increased on-street parking will critically reduce driver visibility around driveways and the overall safety in Forget-Me-Not Lane. This lack of protection for my property is continued down our lane as other properties will lose the same views, sunlight hours, privacy and Lane safety. <u>SUMMARY:</u> <u>A. Loss of Sunlight and Increased Shading</u> The Problem: Building tall buildings next door will block critical north and west sunlight from entering my house and garden and cast long-term winter shadows. The Effect: Losing the sunlight hours would cause shading over my section and others. This will increase winter heating costs as well as reduce physical comfort inside and out. <u>B. Direct Infringement on Privacy</u> The Problem: Multi-storey buildings would look straight down into my private backyard and living areas. The Effect: Upper-storey windows and balconies will overlook my private backyard and indoor living zones, stripping away the reasonable expectation of residential privacy. <u>C. Obstruction of View</u> The Problem: Intensive vertical development on adjacent sections would act as a physical wall, severing my existing view of the Mount Arthur Ranges.	

				The Effect: The open, low density, spacious feel of my neighborhood will be severely impaired. **Single storey housing would not have the same intrusion or inhibit the place myself and others love to live to the same extent. <u>D. Safety and Maneuverability</u> The Problems: With no 'on street' parking on Champion Road vehicles visiting or servicing the proposed medium density housing development will inevitably use Forget-Me-Not Lane. This small lane cannot handle and was <u>never</u> meant to handle that cumulative traffic, restricting safe passing or turning. Increased on-street parking on Forget-Me-Not Lane will critically reduce driver visibility lines around driveways on Forget-Me-Not Lane is a uniquely narrow residential street featuring water-sensitive grass swales. This makes it physically unsuitable for high volumes of on-street parking The Effect: Due to the narrow profile of Forget-Me-Not Lane, high volumes of on-street parking will inevitably restrict road clearance. The overflow of vehicles will choke the street, making two-way traffic impossible.This also creates an unacceptable safety risk by potentially blocking or severely delaying emergency vehicles, such as Fire, Police or ambulances, trying to navigate the street (Forget-Me Not Lane caters to primarily elderly residents).	

Jannis Link

Submitter 194

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS194.1	Proposed Plan Change No. 81 > Maps > Area Maps > 06 - Proposed PC81 - Area - Mapua, Mapua Dr - Higgs Rd	Oppose	Do not remove the planed reserve along Lionel Place. It has been in publicly available plans for a long time, and a reversal would be detrimental.	**Retain the planned reserve** I strongly support retaining the planned reserve adjoining Lionel Place.	The submitter opposes removing the planned reserve along Lionel Place, stressing its long-standing inclusion in public plans. They seek to retain and possibly expand the reserve to provide accessible green space, buffer zones, recreation, and biodiversity benefits amid medium-density housing growth. Additional landscape buffering and development controls are requested for

			• Retain the planned reserve adjoining Lionel Place instead of deleting it. • Require additional landscape buffering and development controls on Site T-237g that recognise the elevated landform and minimise visual dominance, overlooking, privacy and shading effects on Lionel Place. • Recognise that accessible public open space is essential infrastructure and should be enhanced as Māpua grows.	Previous planning maps identified a reserve in this location. The current proposal instead shows "Delete Indicative Reserve." I ask the Council to reverse this change. As this area changes from open farmland to medium-density housing, the need for accessible public open space will increase, not decrease. Retaining the reserve would: • provide an accessible neighbourhood park; • create a green buffer between existing and future developments; • provide space for recreation; • support biodiversity through existing and new planting; • help cool the surrounding area during hotter summers; • soften the visual impact of medium-density housing; and • retain part of the existing landscape character. There is already an established, much loved planted berm adjoining Lionel Place that could be incorporated into the reserve. This provides an excellent opportunity to create an attractive public green space using existing vegetation. The proposed Open Space Zone on Sites T-237e and T-237f is a positive addition. However, because it is located on the edge of the development and in a lower-lying area, it is less accessible for many residents and does little to break up what will otherwise become a large area of continuous medium-density housing. The reserve adjoining Lionel Place serves a different purpose. It would provide a centrally located green space, connect the existing and new neighbourhoods, preserve an important landscape buffer, and create a more attractive transition between them. Good neighbourhoods are planned around parks and open spaces. Green spaces should not simply be located where they are least convenient to develop. They are essential infrastructure, just like roads, footpaths, water and wastewater services. As Māpua grows, public open space should increase, not decrease. I respectfully ask the Council to retain the planned reserve adjoining Lionel Place and, if possible, expand it.	Site T-237g to reduce visual and privacy impacts. They view public open space as essential infrastructure for Māpua's growth.

				As a resident of Lionel Place, I experience this landscape every day and have seen how residents use the existing green edge of the neighbourhood. The proposed reserve is not simply vacant land—it is an important opportunity to create a lasting public asset as the area develops. **Relief sought** I request that the Council: • Retain the planned reserve adjoining Lionel Place instead of deleting it. • Require additional landscape buffering and development controls on Site T-237g that recognise the elevated landform and minimise visual dominance, overlooking, privacy and shading effects on Lionel Place. • Recognise that accessible public open space is essential infrastructure and should be enhanced as Māpua grows. I appreciate the opportunity to make this submission. I support the planned growth of Māpua and believe these changes would help ensure that growth creates a neighbourhood that will be valued by both existing and future residents.	
OS194.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 34 - Proposed PC81 - Zone - Mapua, Higgs Rd	Amend	**Consider additional safeguards where the topography under new development would negatively affect the existing residents.** I request that the Council: • Ensure infrastructure upgrades are delivered before or alongside new development. • Better protect Māpua's rural and village character through appropriate staging, landscaping and public open space. • Retain the planned reserve adjoining Lionel Place instead of deleting it. • Require additional landscape buffering and development controls on Site T-237g that recognise the elevated landform and minimise visual dominance, overlooking, privacy and shading effects on Lionel Place.	**Submission on Proposed Plan Change 81 – Māpua Growth** I support the need for well-planned growth in Māpua and recognise that more housing is needed. However, I believe Proposed Plan Change 81 can be improved. In its current form, it does not do enough to protect Māpua's character or ensure that infrastructure and public open space keep pace with growth. **1. Protect Māpua's rural and village character** Māpua is valued for its village atmosphere and its connection to the surrounding rural landscape. Open spaces, views and the transition between the village and farmland are an important part of its identity.	The submitter supports well-planned growth in Māpua but seeks better protection of rural and village character. They request infrastructure upgrades before or alongside development to avoid service pressures. They oppose deleting the planned reserve near Lionel Place, advocating its retention and expansion for community benefit. Additional landscaping and controls on Site T-237g are sought to reduce visual dominance, privacy loss, and shading impacts on existing homes. Public open space is essential infrastructure.

			• Recognise that accessible public open space is essential infrastructure and should be enhanced as Māpua grow	The scale and density of development proposed in Plan Change 81 risks replacing this character with continuous urban development. I support growth, but it should respect the existing landscape, include generous public open space, and avoid creating large, uninterrupted areas of medium-density housing. **2. Infrastructure must come first** Existing infrastructure is already under pressure. My main concerns are: • wastewater capacity; • drinking water supply; • stormwater management; and • local roads and traffic safety. The supporting reports identify increasing traffic volumes and recognise that wastewater capacity is already a constraint. New development should only proceed when the necessary infrastructure is funded and in place. Existing residents should not experience a reduction in service levels, and future residents deserve infrastructure that meets the needs of a growing community. **3. Site T-237g adjoining Lionel Place** My main site-specific concern is the proposed Medium Density Residential development on Site T-237g adjoining Lionel Place. **Topography and visual effects** Site T-237g sits on higher ground than Lionel Place, which lies in a natural depression. Because of this topography, development on T-237g has the potential to: • dominate the outlook from existing homes; • increase overlooking; • reduce privacy; • reduce winter sunlight; and • permanently change the existing landscape character. These effects are greater than they would be on a level site.	

				I ask the Council to recognise this in the planning provisions by requiring additional landscape buffering, greater setbacks, lower building heights near Lionel Place, or other design measures that reduce these impacts. **Retain the planned reserve** I strongly support retaining the planned reserve adjoining Lionel Place. Previous planning maps identified a reserve in this location. The current proposal instead shows "Delete Indicative Reserve." I ask the Council to reverse this change. As this area changes from open farmland to medium-density housing, the need for accessible public open space will increase, not decrease. Retaining the reserve would: • provide an accessible neighbourhood park; • create a green buffer between existing and future developments; • provide space for recreation; • support biodiversity through existing and new planting; • help cool the surrounding area during hotter summers; • soften the visual impact of medium-density housing; and • retain part of the existing landscape character. There is already an established, much loved planted berm adjoining Lionel Place that could be incorporated into the reserve. This provides an excellent opportunity to create an attractive public green space using existing vegetation. The proposed Open Space Zone on Sites T-237e and T-237f is a positive addition. However, because it is located on the edge of the development and in a lower-lying area, it is less accessible for many residents and does little to break up what will otherwise become a large area of continuous medium-density housing. The reserve adjoining Lionel Place serves a different purpose. It would provide a centrally located green space, connect the existing and new neighbourhoods, preserve an important landscape buffer, and create a more attractive transition between them. Good neighbourhoods are planned around parks and open spaces. Green spaces should not simply be located where	

				they are least convenient to develop. They are essential infrastructure, just like roads, footpaths, water and wastewater services. As Māpua grows, public open space should increase, not decrease. I respectfully ask the Council to retain the planned reserve adjoining Lionel Place and, if possible, expand it. As a resident of Lionel Place, I experience this landscape every day and have seen how residents use the existing green edge of the neighbourhood. The proposed reserve is not simply vacant land—it is an important opportunity to create a lasting public asset as the area develops. **Relief sought** I request that the Council: • Ensure infrastructure upgrades are delivered before or alongside new development. • Better protect Māpua's rural and village character through appropriate staging, landscaping and public open space. • Retain the planned reserve adjoining Lionel Place instead of deleting it. • Require additional landscape buffering and development controls on Site T-237g that recognise the elevated landform and minimise visual dominance, overlooking, privacy and shading effects on Lionel Place. • Recognise that accessible public open space is essential infrastructure and should be enhanced as Māpua grows. I appreciate the opportunity to make this submission. I support the planned growth of Māpua and believe these changes would help ensure that growth creates a neighbourhood that will be valued by both existing and future residents.	

Nigel Kingsbury

Submitter 195

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS195.1	Proposed Plan Change No. 81 > Maps > Area Maps > 28 - Proposed PC81 - Area - Wakefield, Bird Ln	Amend	Why is the indicative road from Pyke Place to Bird Lane being removed? Is this subdivision still going ahead? If so, what is the plan for roading to complete this subdivision? Is another road planned for the completion of this subdivision or is there a plan to use cul-de-sacs? My property is on the inside of the current residential boundary. Thanks	My property could be affected. Why is the indicative road from Pyke Place to Bird Lane being removed? Is this subdivision still going ahead? If so, what is the plan for roading to complete this subdivision? Is another road planned for the completion of this subdivision or is there a plan to use cul-de-sacs? My property is on the inside of the current residential boundary.	The submitter requests clarification on why the indicative road from Pyke Place to Bird Lane is being removed. They ask if the subdivision is still proceeding and what the updated roading plan is to complete it. Concerns include whether another road will replace the removed one or if cul-de-sacs will be used. The submitter's property lies inside the current residential boundary and may be affected.

Natalie Coles

Submitter 196

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS196.1	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic)	Oppose	The above rule does not work for rural locations such as Wakefield and Brightwater. The bus services available are limited and the cycling options are not used for people commuting to Nelson. 1 Parking space should be required for future developments - or a bigger council carpark available nearby - or yellow lines reducing on-street parking on the already un-safe roads (such as Arrow Street).	Rule 16.2.2.3 updates parking and associated access provisions to support reduced car parking demand and greater transport choice, particularly in the Medium Density Residential Zone. It introduces loading requirements where larger developments do not provide parking, sets standards for cycle parking and end of-trip facilities, strengthens accessible parking requirements, and requires electric vehicle charging capability where car parks are provided. The above rule does not work for rural locations such as Wakefield and Brightwater. The bus services available are limited and the cycling options are not used for people commuting to Nelson. 1 Parking space should be required for future developments - or a bigger council carpark available nearby - or yellow lines reducing on-street parking on the already un-safe roads (such as Arrow Street).	The submitter opposes Rule 16.2.2.3, stating it is unsuitable for rural areas like Wakefield and Brightwater. They highlight limited bus services and low cycling use for commuting to Nelson. They request at least one parking space per development, larger council carparks nearby, or yellow lines to reduce unsafe on-street parking on roads such as Arrow Street. The submitter stresses the need for safer, practical parking solutions in these locations.

Joshua Riddell

Submitter 197

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS197.1	Proposed Plan Change No. 81 > Maps > Area Maps > 11 - Proposed PC81 - Area - Motueka, McBrydie Rd	Oppose	No indicative walkway please.	I don't know if this is the right section. But I want to oppose y The 'indicative walkway' running along the drive way of 80 stony ridge way. I oppose it because it's my drive way and I don't want a walkway on it now or in the future. Cheers Josh Riddell	**Submission Summary:** The submitter opposes the proposed *indicative walkway* along the driveway of 80 Stony Ridge Way. They request no walkway be included now or in the future on their driveway. The submitter is concerned about property access and privacy.

Nelson Tasman Climate Forum

Submitter 198

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS198.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	Amend PC81 to limit MDRZs to existing urban areas, undertake regular monitoring of outcomes, and continue engagement with iwi and community groups.	Urban intensification better utilises existing infrastructure, reduces emissions and infrastructure costs, and is more likely to achieve successful long-term outcomes with community support.	**Submission Summary:** The submitter seeks to amend PC81 by restricting Medium Density Residential Zones (MDRZs) to existing urban areas. They request regular monitoring of outcomes. Ongoing engagement with iwi and community groups is also desired. This approach aims to optimize infrastructure use, lower emissions and costs, and support successful, community-backed urban intensification.
OS198.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic)	Oppose	Provide quantified emissions assessments for development options and place greater emphasis on urban intensification over greenfield growth.	The NPS-UD requires planning decisions to contribute to reduced greenhouse gas emissions and the submitter considers more evidence is required to demonstrate this outcome.	**Submitter's Position:** Oppose the proposal. **Decision Sought:** • Require quantified emissions assessments for development options.

					• Prioritize urban intensification over greenfield growth. **Reason:** The submitter believes the proposal lacks sufficient evidence to show it will reduce greenhouse gas emissions, as required by the NPS-UD.
OS198.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend			The submission seeks a clear decision on the proposal. The reason given is to ensure transparency and proper evaluation under the RMA.
OS198.4	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend			The submission requests a decision on the proposal. They seek this to ensure the decision aligns with their interests and concerns. No additional details were provided to clarify their specific reasons.
OS198.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond	Amend	Amend Policy 6.8.3.24 and associated provisions to provide for urban wetlands, rain gardens and other green infrastructure.	Nature-based solutions can improve climate resilience, biodiversity, amenity values and stormwater management outcomes.	Submitters seek to amend **Policy 6.8.3.24** and related provisions. They want to include urban wetlands, rain gardens, and green infrastructure. The reason is that nature-based solutions boost climate resilience, biodiversity, amenity, and stormwater management.
OS198.6	Proposed Plan Change No. 81	Oppose	Give greater weight to the long-term costs and resource implications of greenfield growth when assessing development options.	Greenfield growth can result in higher per-person infrastructure costs and may divert resources from future climate adaptation requirements.	Submitters oppose the proposal. They seek greater emphasis on long-term costs and resource use linked to greenfield growth. Concerns include higher infrastructure costs per person. They worry this growth may divert resources from climate adaptation needs.

Peter Olorenshaw

Submitter 199

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS199.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential	Amend	Amend PC81 to recognise dwelling partitioning as a housing supply mechanism, expressly enable partitioning of existing	The submitter considers partitioning can provide affordable and efficient housing supply, increase density	The submitter requests amending PC81 to allow dwelling partitioning as a

	Zone Rules > 17.1A.3 Building Construction or Alteration		dwellings as a permitted activity without resource consent, consider enabling partitioning across all residential zones, clarify the relationship between Rules 17.1A.3.1(a) and 17.1A.3.2, and exempt partitioned dwellings from development contributions.	without requiring significant infrastructure investment, make better use of existing housing stock, reduce pressure for greenfield expansion, and respond to increasing demand for smaller dwellings.	permitted activity without resource consent. They seek this across all residential zones and want clarity between specific planning rules. They also propose exempting partitioned dwellings from development contributions. The reason is that partitioning can boost affordable housing, increase density efficiently, better use existing homes, reduce greenfield pressure, and meet demand for smaller dwellings.
OS199.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	Clarify the wording of the rules to confirm whether partitioning an existing dwelling into two dwellings is permitted without resource consent.	Greater certainty is needed to ensure the rules operate as intended and do not create unnecessary consenting requirements.	The submitter seeks to **clarify the rules** on whether splitting one dwelling into two requires resource consent. They want **greater certainty** to avoid unintended consenting needs. This aims to ensure the rules work as intended without adding unnecessary processes.
OS199.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Require outdoor living spaces, decks and balconies to receive a minimum amount of winter sunlight. Amend recession plane controls to better protect winter sunlight and enable an incremental transition to terrace housing forms.	Sunlight access is an important component of residential amenity and the usefulness of outdoor living areas. Existing dwellings rely on winter sunlight for residential amenity and thermal comfort, and excessive shading should be avoided.	**Summary of Submission** The submitter opposes the proposal. They seek a requirement for outdoor living areas to receive minimum winter sunlight. They want recession plane rules amended to protect sunlight and support terrace housing transitions. They argue winter sunlight is vital for residential comfort and outdoor space use. Excessive shading should be prevented to maintain amenity and warmth.
OS199.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Remove or reduce side yard setback requirements and allow buildings closer to side boundaries.	Greater flexibility would improve development efficiency and facilitate terrace housing and other medium-density forms.	Submitters oppose the proposal. They seek removal or reduction of side yard setback requirements.

					This would allow buildings to be closer to side boundaries. They believe greater flexibility will improve development efficiency. It will also facilitate terrace housing and medium-density developments.

Robyn Reid

Submitter 200

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS200.1	2-Out of Scope	Amend	Rezone 1427 Moutere Highway to a Residential Zone. If immediate rezoning is not supported, apply a Deferred Residential Zone or equivalent mechanism. Alternatively, identify the site within the Future Urban Growth Framework or similar strategic growth mechanism. Require any future development to be subject to structure planning, infrastructure assessments, engineering design, stormwater, transport, ecological and landscape assessments, staged implementation, and all necessary RMA approvals.	The site adjoins the existing Upper Moutere settlement, is considered suitable for integrated and master-planned residential growth, has existing servicing and access, and could help meet future housing demand while supporting the long-term sustainability of the township. The submitter considers the land has limited productive capability, infrastructure constraints have not been shown to be prohibitive, and future development can be appropriately managed through detailed planning and consent processes.	The submitter seeks rezoning of 1427 Moutere Highway to Residential or, if not immediate, a Deferred Residential Zone. Alternatively, they propose inclusion in a Future Urban Growth Framework. They request future development be managed via structure planning and necessary assessments (infrastructure, stormwater, transport, ecological). The site adjoins Upper Moutere, is suitable for planned growth, has access and servicing, and can help meet housing demand sustainably.

Roshan Babu

Submitter 201

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS201.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 62 - Proposed PC81 - Zone - Wakefield, Bird Ln	Support	I support the proposed rezoning under Plan Change 81 affecting my property/area.		I support the proposed rezoning under Plan Change 81 affecting my property/area.

Chloe Roshan

Submitter 202

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS202.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 62 - Proposed PC81 - Zone - Wakefield, Bird Ln	Support	I support the proposed rezoning under Plan Change 81 affecting my property/area.		I support the proposed rezoning under Plan Change 81 affecting my property/area.

Neil Moon

Submitter 203

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS203.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Amend	Decisions Sought from the Tasman District Council: I request the Council make the following amendments to Plan Change 81: **Shift the MDRZ Boundary Line:** Move the active boundary line further north east toward the main thoroughfare, Otia Drive (park and graveyard side) being a natural demarcation, ensuring that the entirety of the quieter suburban pocket of St James Avenue and adjacent properties remain under standard Residential zoning. Confirmation from the Tasman District Council: That the existing covenants on St James Ave are enforced with any new development on the street. Confirmation from the Tasman District Council: That the St James Avenue Reserve keeps its Recreation Reserve status and remains as a park for the local community. Extract from Draft Richmond Ward Reserve Management Plan May 2025. *"St James Avenue Reserve meets and exceeds the expectations as a well-functioning all around neighbourhood reserve with great passive surveillance."* The new MDRZ map shows the park as being part of this zone rather than being identified as a Recreation zone. The Open Space Assessment Richmond Ward does state that the existing reserve will be classified as a Recreation reserve. Map:80-51 should reflect that.	Specific Provision of the Plan Change this submission relates to: The spatial boundary lines mapping the **Medium Density Residential Zone (MDRZ)** on St James Avenue, Richmond, and the lack of a staggered transitional zone or enhanced privacy controls at the point where the zone changes partway down the street. Reference Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd. The Submitter's Position is: **Oppose in Part.** I oppose the arbitrary application of the MDRZ boundary line partway down St James Avenue. While I understand the intent of the National Policy Statement on Urban Development (NPS-UD) to clear housing bottlenecks the reasons for location of the demarcation between zones are not clearly articulated nor does it meet council design guidelines or the existing covenants on the properties in this street. Introducing an abrupt 11-metre (three-storey) building allowance immediately adjacent to or across from lower-density standard residential sections creates an extreme imbalance. This directly threatens the existing neighbourhood character, traffic safety and the baseline amenity values (specifically privacy and daylight access) of the lower-density sections on the street, including 29 St James Avenue. Reasons for Opposition: • **Severe Amenity Inequity:** An abrupt boundary change allows a 3-storey multi-unit development to be built adjacent to single-storey family	Submitters request the MDRZ boundary on St James Avenue be moved northeast toward Otia Drive, keeping the residential area and park under current zoning. They oppose abrupt zoning changes allowing 3-storey buildings next to single-storey homes, citing privacy loss, shading, and traffic issues. They seek enforcement of existing covenants and retention of the park's Recreation Reserve status. They support transitional buffers to protect neighborhood character. Several residents back this submission.

			Advice from the Tasman District Council: How any developments would be managed to comply with the guidelines referenced above (B2 and F2) to prevent a random mix of housing types.	homes. This creates a severe loss of privacy (overlooking into private backyards), loss of sun and substantial winter shading that the standard daylight recession planes do not adequately prevent on a street of this orientation. Further this results in a loss of passive winter heating hence adding costs for additional heating. • **Potential Effect on Property Values:** Future property buyers may be put off or expect to pay less for an existing home potentially or actually dominated by an adjacent 3 story building. This is a developers gain at a cost to the existing residents which is inequitable. • **Demarcation partway down St James Ave:** No specific reason given for this. With reference to the TDC Urban Design Guide **Compatibility (Guideline B2):** States "Create a coherent streetscape in areas of mixed dwelling forms and size…" Breaking into groups the sections of streets that are of one type or another so there is not a random mix. I have not seen anything that would promote or require this. Single site development is completely at odds with this. **Frontages (Guideline F2):** "Encourage overall neighbourhood character, cohesion, quality and attractiveness….". This is currently the situation in St James Ave, adding up to 3 story buildings would completely alter the streetscape and would ruin the character of the neighbourhood. **Neighbourhood Centre Provision (Guideline A2):** Says that a centre should be withing a 10 minute walk. St James Ave is by any of the walking routes more like 20 – 25 minutes, so would be considered outside a MDRZ. The following extract from Appendix 15.1 Para 11 uses the phrase "walkable catchments of centres". **Existing Covenant:** As part of the original development of St James Ave an easement is attached to each title. This restricts the type of development for each property (to ensure Guidelines B2 and F2 are met). These include (not all listed) :- **Erect or permit to be erected upon any of the allotments:** (i) One dwelling per property (v) Any dwelling with less than a double garage of 36m2.	

				(xviii) Any structure including dwellings, buildings, masts and aerials exceeding a height of 7.5 metres above the mean ground level of the land The covenant is one of the key reasons for buying and owning a property in this street as it provided certainty over the character and amenity of the street. • **Lack of Transitional Buffer:** Good urban design mandates a "step-down" or transitional buffer zone (e.g., restricting properties immediately bordering the boundary to a maximum of 8 metres or duplex-only configurations) rather than an immediate drop from 11 metres to standard low-density rules. • **Infrastructure and Traffic Constraints:** The narrow layout of St James Avenue cannot handle the localized traffic congestion and on-street parking overflow that occurs when multi-unit developments have insufficient on-site parking. Currently the majority of parking is off road, allowing good traffic movement especially for utility vehicles (rubbish, street sweeper etc) and the like. If parking were to occur on both sides of the street it effectively reduces it to a single lane Attendance at Hearings: • I **do** wish to be heard in support of my submission at the Council planning hearings. • If others make a similar submission, I will consider presenting a joint case with them at the hearing. **References** TDC Urban Design Guide 15 December 2018 TDC Update Map:80-51 19 June 2026 Annexure schedule for St James Ave Properties 28 November 1999 TDC TRMP Appendix 10 - Open Space Assessment Richmond Ward Draft Richmond Ward Reserve Management Plan May 2025 **Other residents who support this submission and include their addresses as those being affected.** Dave and Bernadette Storer	

				33 St James Ave Neville and Lorraine Malcolm 35 St James Ave Wendy & Andrew Neame 38 St James Ave Shirley Hope 31 St James Ave Robin and Theresa Brown 26 St James Ave Jackie and Michael Vaughan 24 St James Ave Fiona Patrick & Grant Michalick 37 St James Ave Christopher & Olivia Phillips 36 St James Ave	

Melanie Cloutier

Submitter 204

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS204.1	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Amend	Delete the words: *"but also recognise that sunlight admittance may decline with increasing residential density, particularly medium density."* Alternatively, amend the objective so that it requires residential intensification to maintain adequate access to daylight and sunlight for existing and future residential properties.	5.2.3.2 The proposed additional wording weakens the objective of ensuring adequate daylight and sunlight by accepting that sunlight access may decline as residential density increases. Access to winter sunlight is an important component of residential amenity in New Zealand. Many existing homes, particularly older homes, have limited insulation and no central heating and rely on passive solar heating to maintain comfortable indoor temperatures and reduce energy costs. During winter, indoor temperatures in these homes can be very low, making access to sunlight particularly important.	Submitters seek to delete the phrase acknowledging sunlight decline with increased residential density. They propose amending the objective to require maintaining adequate daylight and sunlight access for all residential properties. Their concern is that accepting sunlight loss weakens residential amenity, especially in winter. They emphasize the importance of sunlight for heating, comfort, and outdoor activities. They advocate designing intensification to minimize sunlight loss, not accept it.

				Winter sunlight also supports the use of outdoor living areas and enables clothes to be dried outdoors. Residential intensification should be designed to minimise the loss of daylight and sunlight to existing and future residential properties, rather than accepting its decline as an inevitable consequence of increased density.	
OS204.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.3 Policies	Amend	6.4A.3.12 Amend the policy to ensure that minimum density requirements and comprehensive development objectives do not unnecessarily restrict reasonable subdivision opportunities for existing property owners. Provide clearer criteria for when a subdivision would be considered to compromise future development potential, while maintaining fairness for individual landowners. 6.4A.3.13 Amend the policy to ensure that approval certainty for comprehensive developments does not reduce the importance of assessing site-specific effects on existing properties and communities. 6.4A.3.14 Amend the policy to clarify that the benefits of intensification must be balanced against potential adverse effects on existing residents, including sunlight access, privacy, and neighbourhood amenity. 6.4A.3.15 Require clearer minimum standards for tree retention and provision in medium-density developments, such as minimum canopy cover, minimum landscaped areas, or minimum tree requirements proportionate to site size. 6.4A.3.17	6.4A.3.12 I am concerned that this policy may significantly restrict the ability of individual property owners to subdivide and develop their land by requiring future development to achieve minimum density targets and align with comprehensive development outcomes. While I understand the need to provide for additional housing, the policy appears to prioritise large-scale redevelopment outcomes over the reasonable use and flexibility of existing properties. Individual property owners should not be disadvantaged because their preferred development does not align with a future comprehensive development model. 6.4A.3.13 I am concerned that prioritising certainty for comprehensive developments may result in insufficient consideration of the effects on existing residents. Achieving a Design Matrix score and meeting development standards does not necessarily mean that a development will avoid adverse impacts such as loss of sunlight, privacy, outlook, and neighbourhood amenity. 6.4A.3.14 I am concerned that this policy may minimise the impacts of intensification on existing residents by suggesting that changes to amenity values are not adverse when they contribute to housing outcomes. While I support providing housing, existing residents should not automatically bear	The submitter seeks amendments to policies to protect individual property owners' subdivision rights and ensure clear criteria on development impacts. They want balanced consideration of intensification effects on sunlight, privacy, and neighborhood amenity. Stronger tree retention standards are requested to maintain greenery. Infrastructure capacity must be assessed cumulatively, with fair cost allocation, to avoid undue burden on existing ratepayers amid intensification pressures.

			Require clear assessment of existing and future infrastructure capacity before approving significant intensification, and ensure that the costs of required upgrades are fairly allocated without placing unreasonable additional pressure on existing ratepayers.	significant losses in sunlight, privacy, green space, or quality of living environment. 6.4A.3.15 I support the objective of maintaining urban tree cover; however, I am concerned that encouraging tree retention and planting may not be sufficient to prevent further loss of greenery through medium-density development. Trees provide important benefits including shade, cooling, biodiversity, stormwater management, and neighbourhood amenity. 6.4A.3.17 I am concerned that infrastructure impacts from intensification should not be assessed only on a case-by-case basis. Multiple developments occurring across the Medium Density Residential Zone may create cumulative pressure on infrastructure, including stormwater, wastewater, transport, and other services.	
OS204.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.20 Methods of Implementation	Amend	6.4A.20.2 Amend the policy to clarify the extent and funding source of any advocacy activities. Any use of Council resources to promote development opportunities should be transparent, justified by clear community benefits, and carefully considered against other priorities competing for ratepayer funding.	6.4A.20.2 I am concerned that Council resources, including ratepayer funding, may be used to actively promote development opportunities to external developers. While supporting housing supply is important, I do not consider that existing ratepayers should automatically fund marketing or advocacy activities aimed at attracting private development interests.	The submitter seeks to amend policy 6.4A.20.2 to clarify the scope and funding of advocacy activities. They want Council resource use for promoting development to be transparent and justified by clear community benefits. They are concerned about ratepayer funds being used to market or advocate for private development. Their position is that supporting housing is important but ratepayers should not automatically fund such promotional efforts.
OS204.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.30 Principal Reasons and Explanation	Amend	6.4A.30 Amend the explanation to provide greater recognition of the impacts of intensification on existing residents, including infrastructure capacity, stormwater management, rates impacts, loss of private tree cover, sunlight, privacy, and neighbourhood amenity. Ensure that housing growth is	6.4A.30 I acknowledge the need for a range of housing types and the importance of providing housing opportunities. However, I am concerned that the explanation places significant emphasis on enabling intensification and providing certainty for developers, while the impacts and costs	The submitter seeks to amend Decision 6.4A.30 to better recognize intensification impacts on existing residents. Concerns include infrastructure capacity, stormwater, rates, loss of trees, sunlight, privacy, and neighborhood amenity.

			balanced with maintaining a healthy and liveable environment for existing communities.	experienced by existing communities are not given equal consideration. The explanation acknowledges existing infrastructure limitations, stormwater challenges, flooding risks, and loss of private tree cover, but these issues appear to be treated as challenges to manage rather than important constraints that should influence the scale and timing of intensification.	They want housing growth balanced with a healthy, liveable environment. The submitter feels current explanations focus too much on enabling development, not enough on existing community costs and constraints.
OS204.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond > 6.8.3 Policies	Amend	6.8.3.25A Amend the policy to recognise that where new or upgraded stormwater infrastructure is required as a result of residential intensification or new development, the costs should, where reasonably practicable, be met by the development creating the demand rather than being transferred to existing ratepayers. Ensure that funding responsibilities are transparent and fairly allocated.	6.8.3.25A I support ensuring that stormwater infrastructure protects recreational access, ecological values, and open space amenity. However, I am concerned that increased residential intensification may require additional stormwater infrastructure and upgrades, resulting in increased costs for existing ratepayers. Given the significant increases in rates already experienced by many households, it is important that existing residents are not expected to fund infrastructure required primarily to support new development.	The submitter seeks to amend policy 6.8.3.25A to ensure new or upgraded stormwater infrastructure costs caused by residential intensification or new development are paid by the developer, not existing ratepayers. They support protecting recreational, ecological, and open space values but are concerned existing ratepayers face higher costs due to new development. They want fair, transparent funding that does not burden current residents.
OS204.6	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.30 Principal Reasons and Explanation	Amend	Amend the policy to ensure that developments without on-site vehicle access demonstrate that the needs of all residents, including people with mobility impairments, have been considered. Require assessment of cumulative parking impacts and ensure that increased residential density does not place unreasonable additional pressure on existing on-street parking availability.	I am concerned that allowing medium density residential development without requiring on-site vehicle access may increase pressure on already limited on-street parking availability, particularly in the Richmond Intensive Development Precinct. Existing demand for all-day parking in central Richmond is already high, and additional residential intensification may worsen parking pressures for residents, workers, visitors, and businesses. I am also concerned that reduced vehicle access requirements may create accessibility challenges for people with mobility impairments, older residents, and those who cannot easily rely on active transport options.	**Summary of submission:** The submitter seeks to amend the policy to require developments without on-site vehicle access to demonstrate consideration of all residents' needs, including those with mobility impairments. They want cumulative parking impacts assessed to avoid increased pressure on existing on-street parking. Concerns focus on Richmond's high parking demand and potential accessibility issues for older residents and people with mobility challenges.
OS204.7	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic) > 16.2.2 Land Use > 16.2.2.3 Permitted Activities (Land Use - Provision for Parking and Loading)	Amend	Cycle parking I support encouraging active transport; however, I am concerned that the proposed cycle parking requirements appear unchanged despite the significant increase in residential density enabled by the Medium Density Residential Zone. Intensification will result in more residents and increased demand for transport infrastructure, and existing requirements may no longer be sufficient to support safe and practical cycling outcomes.	Cycle parking I support encouraging active transport; however, I am concerned that the proposed cycle parking requirements appear unchanged despite the significant increase in residential density enabled by the Medium Density Residential Zone. Intensification will result in more residents and increased demand for transport infrastructure, and existing requirements may no longer be	The submitter supports active transport but is concerned that cycle parking requirements remain unchanged despite increased residential density under the Medium Density Residential Zone. They believe more residents will increase demand for transport infrastructure, and current cycle parking provisions may be insufficient for safe, practical cycling outcomes. They seek amendments to address this issue.

				sufficient to support safe and practical cycling outcomes.	
OS204.8	2-Out of Scope	Amend	Amend the policy to encourage, where appropriate and practical, the inclusion of suitable fruit or other edible tree species within public reserves, open spaces, and amenity planting areas. This would provide additional community, environmental, and educational benefits while contributing to local food resilience during periods of food insecurity.	I support the proposed landscaping and amenity planting requirements. Well-designed planting improves neighbourhood amenity, biodiversity, shade, and resilience to increasing summer temperatures. I consider there is also an opportunity to provide additional community benefit through the inclusion of suitable edible trees where appropriate.	The submitter supports amending the policy to encourage planting fruit or edible trees in public reserves and open spaces. They believe this would enhance community, environmental, and educational benefits. The submitter notes that well-designed planting improves amenity, biodiversity, shade, and climate resilience. Including edible trees would also boost local food resilience during food insecurity periods.
OS204.9	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.2 Land Use > 17.1A.2.1 Permitted Activities (Land Use - General)	Amend	Animals Amend the rule to review the minimum setback requirement for domestic fowl enclosures in the Medium Density Residential Zone so that it is proportionate and consistent with the zone's other development standards while continuing to protect neighbouring properties from unreasonable adverse effects.	Animals I am concerned that the minimum 2 metre setback for domestic fowl enclosures may be unnecessarily restrictive in the Medium Density Residential Zone, particularly where the Plan allows buildings to be located closer to property boundaries. Given that the number of fowls is already limited, roosters are prohibited, and general nuisance, odour and dust provisions apply, the setback requirement should be reviewed to ensure it remains proportionate.	The submitter seeks to amend the rule on minimum setbacks for domestic fowl enclosures in the Medium Density Residential Zone. They argue the current 2-metre setback is too restrictive compared to other zone standards. Given limits on fowl numbers, a rooster ban, and nuisance rules, they request a review to ensure setbacks are fair while still protecting neighbours from adverse effects.
OS204.10	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	Amend Rule 17.1A.3.2 to: • Reduce the maximum building height for Medium Density Residential development adjoining existing residential properties to a maximum of two storeys. • Increase minimum side and rear boundary setbacks beyond 1.5 metres where development adjoins existing residential properties, to provide better protection of sunlight access, privacy and residential amenity. • Strengthen provisions to protect access to sunlight and daylight for neighbouring properties, including consideration of winter sunlight effects. • Ensure comprehensive medium density developments consider the effects of increased residential intensity on surrounding transport networks, parking availability, pedestrian safety and nearby community facilities such as schools. • Provide affected adjoining property owners an opportunity to comment on comprehensive medium density developments where	The proposed Medium Density Residential provisions allow buildings up to 11 metres in height, which effectively enables three-storey development, together with reduced side and rear setbacks of 1.5 metres. These standards may result in significant adverse effects on adjoining residential properties, particularly where new medium density developments are located immediately beside existing homes. For properties adjoining existing residential areas, the combination of increased building height, reduced setbacks and increased site coverage has the potential to create unreasonable effects, including loss of winter sunlight, increased shading, reduced privacy, visual dominance, and a loss of residential amenity. A maximum height of two storeys would still allow meaningful residential intensification while providing a more appropriate transition between existing homes and higher-density development.	The submitter seeks to amend Rule 17.1A.3.2 by reducing building height to two storeys for Medium Density Residential areas next to existing homes. They want larger side and rear setbacks to protect sunlight, privacy, and amenity. They also request stronger daylight protections, consideration of winter sunlight, and assessment of transport, parking, and community facility impacts. Adjoining owners should have a chance to comment on developments affecting sunlight, privacy, or visual dominance.

			significant effects on sunlight, privacy, shading or visual dominance may occur.	The proposed daylight controls do not adequately protect access to sunlight, as they primarily control building bulk rather than ensuring neighbouring properties retain reasonable sunlight access, particularly during winter when sunlight is important for warmth, health and energy efficiency. The increased number of dwellings enabled by comprehensive development may also increase pressure on surrounding infrastructure, including vehicle movements, parking availability, pedestrian safety and nearby school environments. These effects should be considered when determining the appropriate scale and form of development.	
OS204.11	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Amend	I request that Council amend the Medium Density Residential Zone provisions as follows: • Reduce the maximum building height for medium density developments adjoining existing residential properties to a maximum of two storeys, or otherwise introduce stronger height transition controls to protect neighbouring properties. • Increase the minimum side and rear boundary setbacks where medium density development adjoins existing residential properties to reduce building dominance, protect privacy and maintain access to sunlight and daylight. • Strengthen sunlight access provisions so that they consider not only daylight admission but also the retention of reasonable direct sunlight access, particularly during winter months. • Review the relationship between building height, building coverage and setbacks to ensure that the combined effects of these standards do not result in developments that are inconsistent with the objective of safeguarding residential amenity. • Amend notification provisions so that adjoining property owners have an opportunity to comment where a comprehensive development may result in significant effects on sunlight access, privacy, shading or visual dominance, even where the proposal technically complies with the permitted standards.	The proposed Medium Density Residential Zone provisions seek to enable housing intensification while ensuring that design quality and neighbour amenity are safeguarded. However, I consider that the proposed development standards do not provide sufficient protection for existing residential properties adjoining medium density development. The proposed maximum building height of 11 metres effectively enables three-storey development. While higher-density housing has an important role in meeting housing needs, allowing three-storey buildings immediately adjacent to established residential properties may result in significant adverse effects that are inconsistent with the stated objective of protecting neighbour amenity. The combination of an 11 metre building height, reduced side and rear boundary setbacks of 1.5 metres, increased site coverage of up to 70 percent and building coverage of up to 60 percent has the potential to create buildings that are visually dominant and out of scale with surrounding residential properties. These effects may include loss of sunlight, increased winter shading, reduced privacy, loss of outlook, and a reduced sense of space for adjoining residents. The Principal Reasons for Rules state that side and rear setbacks are intended to reduce the dominance of buildings, enable access to daylight and provide reasonable privacy. They also state	Submitters seek amendments to Medium Density Residential Zone rules to better protect neighbours. They want building heights near existing homes limited to two storeys and increased setbacks to reduce dominance and maintain privacy. Stronger sunlight access rules, especially for winter, are requested. They oppose non-notification of developments that may significantly affect neighbours. Concerns include overshadowing, privacy loss, and transport impacts, urging careful consideration of intensification effects on community amenity.

				that daylight admission lines are intended to manage shading and allow a reasonable level of sunlight to penetrate onto adjoining sites. However, the proposed controls do not adequately protect direct sunlight access, particularly during winter months when sunlight is important for residential warmth, energy efficiency and healthy living environments. The proposed rules also acknowledge that medium density development is intended to encourage an intensive urban built form with two to three-storey developments. Where such development occurs within established residential areas, additional consideration is required to ensure an appropriate transition between higher-density housing and existing homes. A two-storey maximum height adjoining existing residential properties would still enable meaningful intensification while providing a more appropriate balance between housing supply objectives and the protection of existing residential amenity. Additional setbacks and stronger sunlight protection would also better align the rules with Council's stated intention that neighbour amenity be safeguarded. The proposed non-notification provisions also create concern. A development may comply with the proposed standards and proceed without affected neighbours having an opportunity to comment, despite potentially significant effects from building height, shading, privacy impacts and visual dominance. The effects of medium density development cannot always be fully addressed through general standards alone, and affected adjoining property owners should have an opportunity to participate where their residential amenity may be significantly affected. The location of medium density development should also take into account existing community infrastructure and transport conditions. Increased residential density can result in additional vehicle movements, parking demand and pedestrian activity, particularly in areas near schools. These effects should be carefully	

				considered to ensure intensification is supported by safe and functional transport environments.	

Manahi Te Hiakai Timothy Gardiner

Submitter 205

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS205.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	Our pākainga should be protected from any RMA reforms that may negatively implicate any development on our lands and dwellings, the Fast Track Bill and the Regulatory Standards Bill that have the ability to alienate us from our lands and to have our lands taken for any projects of "National Significance". If there are any major developments that involves anybody outside of the organization, trust and/or entity that may own/manage/govern a papakainga and it's grounds, consultation should be sought first with the occupants of the papakainga and it's associated parties - Such as the community that contributes to one's local marae, members of whānau, hapū, iwi and marae associated with the pākainga. Other legal protections that needs to be sought, is the enablement of outside property developers to purchase or lease whenua for one's own financial gain to the detriment of the life and mouri of pākainga and the people associated with it. With legal protection other whānau, marae and Māori communities that have an interest within the area of governance of the Tasman District Council such as Ngāti Tama, Ngāti Koata and Ngāti Kuia in Richmond towards Appleby and our other relations under Manawhenua Ki Mōhua - Our Ātiawa, Ngāti Tama & Ngāti Rārua whānau in Golden Bay can develop pākainga of their own in their own areas of occupation. This can extend to other whānau from Motueka, that may want to develop their current dwellings and for it to be zoned as an papakainga. "He Ao Kei Runga! He Au Kei Raro! He Tai Timu! He Tai Aorere!"	To whom it may concern, I am a descendant of the Ngāti Kōmako hapū of the Matua hapū of Puketapu of the iwi of Te Ātiawa and a member of the Park whānau of Whakarewa and a member of Te Āwhina Marae. This policy is a positive step forward for our marae papakainga situated at the back of Te Āwhina Marae, towards Whakarewa St to the south and Queen Victoria St to the west. This will enable our whānau and relatives to be able to expand, create and build more dwellings on our papakainga lands. In addition this will enable ourselves to be able to create and foster a community of our many whānau that are uri of Ngāti Rārua - Parerārua, Tūrangaapeke & Pareteata and Te Ātiawa - Puketapu & Ngāti Rāhiri that are uri and members of Te Āwhina Marae and the wider Motueka area from Māpua to Te Matau - Separation Point, under our own autonomy and self determination in an recognized legal way under Te Ture Whenua Māori Act 1993. Our rights of occupation is a birthright from our forebears long ago with multiple dwellings surrounding the site of our marae - Te Āwhina. These dwelling sites includes Ngākinga - Gardens such as Te Mātū, Piri Kahikatea and Te Kāpenga; Old Marae & Pākainga such as Piri Kahikatea, Te Āmate & Te Awamate; Whānau sites of occupation such as Whakarewa St Orchard - Pamarika Block - Park Whānau; Grey St Urban Area - Rangiāuru Whānau; 173 Whakarewa St - Stephens Whānau; Te Tāna Pukekōhatu Development - Luke Whānau. However for this policy to go through, this will enable us to consolidate ourselves and dwellings in local government with rights and protections over our papakainga as customary lands that was agreed upon in the Nelson Purchase, whom our ancestors were participants and signatories of that agreement.	**Support for protecting pākainga lands** Submitters seek protection from RMA reforms, the Fast Track Bill, and Regulatory Standards Bill that risk alienating Māori from their lands. They want mandatory consultation with pākainga occupants, whānau, hapū, iwi, and marae before external developments. Legal safeguards are requested to prevent outside developers from buying or leasing whenua to ensure the wellbeing of pākainga communities. The proposal supports whānau autonomy, expansion, and development under Te Ture Whenua Māori Act 1993.

Tony Macfarlane

Submitter 206

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS206.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	I oppose the proposed section 17.1A.3.2.	Shearer Terrace is a well-established, low-density residential neighbourhood characterised by excellent sunlight access and open views to the mountains of Kahurangi, the Richmond hills and the sea. Allowing 14 m high multi-dwelling developments will introduce significant adverse effects: · Loss of daylight and sunlight – constructing up to14 metre structures adjacent to existing single or double-storey homes will severely obstruct living conditions and creates prolonged winter shading, decreases natural indoor warmth, and drivesup household energy costs. · Current Solar power installations would be compromised with elevated structures alongside. · Loss of views and visual amenity – high density, multi-dwelling blocks will create dominant, imposing building mass. This destroys the established suburban open space, visually smothers neighbouring properties, and compromises privacy through direct overlooking. This will create neighbourhood character imbalances with future slums and crime escalation. · Severe traffic and parking congestion – even if we are close to the town centre, it is likely that many of these dwellings are going to have at least 1 or 2 cars each and will never have enough off-street parking to accommodate these. Shearer Terrace is already severely congested with parking creating blind spots for pulling out of driveways. It can already be difficult to drive down the street with cars parked on both sides when you meet a vehicle coming the other way. · The additional vehicle movements that these multi-dwelling developments will create will materially worsen existing traffic safety and access issues on Shearer Terrace including access by emergency services and refuse collection. It will alsoput pressure on local road networks in Richmond. · Increased noise and emissions detracting from quality of life. It would be reasonable to apply this proposal to all new greenfield developments in	**Submission opposes** the proposed 14m multi-dwelling buildings in Shearer Terrace. Concerns include loss of sunlight, views, and privacy affecting living conditions. Solar power installations could be compromised. Traffic and parking congestion would worsen, impacting safety and emergency access. Noise and emissions may reduce quality of life. The proposal is seen as unsuitable for established, low-density suburbs like Shearer Terrace, unlike greenfield or urban areas.

				Richmond where the people buying into it knew what to expect and the infrastructure could be designed to handle the increased density with adequate pipes, parking, green space etc. It is unreasonable to retrospectively impose this on existing residential areas where residents bought with a different expectation of neighbourhood scale and amenity and property value, which will reduce. · The Appendix 15.3 Intensification Study Drawings showing example developments do not include a single example of a 14m building. This absence suggests that the practical effects of a 14m building in the type of residential street have not been clearlydemonstrated. · I know Christchurch well and is easy to find examples! 14m high developments are allowed in central city. Christchurch has a population of over 400,000 vs Richmond's 20,000. This comparison highlights that a 14m building height is more typical of a central urban context than an established low-density suburban street such as Shearer Terrace as opposed to Christchurch being rebuilt post earthquake on a blank canvas including the rebuild of infrastructure to cater for intensive living – unlike the situation in Richmond. Refer to original submission for more information	
OS206.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Oppose	Change proposal for Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise and Washbourne Drive from the Medium Density Residential Zone and the Richmond Intensive Development Precinct to Residential zone (as we are now).	I agree intensive development is required for the future in Richmond – BUT should be planned for in new subdivisions that allows infrastructure to be in place while building from the outset with people able to purchase a home without being surprised by changes as we have been. Refer to original submission for more information	The submitter opposes the proposal. They seek to revert Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise, and Washbourne Drive back to Residential zone from Medium Density Residential and Richmond Intensive Development Precinct. They agree intensive development is needed but want it planned in new

					subdivisions with proper infrastructure from the start. They want existing homeowners to avoid unexpected zoning changes.

Hayley Kyte

Submitter 207

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS207.1	Proposed Plan Change No. 81 > Maps > Area Maps > 05 - Proposed PC81 - Area - Mapua, Higgs Rd	Amend	I support this indicative walkway and request that it be extended to the coast / native bush area.	If I understand correctly, the indicative walkway shown here is the same walkway that is currently informally available to the public, through the generosity of the current landowners. This informal arrangement currently means people can access the estuary from Higgs Road and provides a valuable recreation space and connection to the water through a track of native bush. This is a significantly beautiful area to walk in and be connected with, so it would be great to make it an official public walkway.	Support for the indicative walkway is expressed, with a request to extend it to the coast and native bush area. The walkway currently offers informal public access and valuable recreational connection to the estuary. Making it an official public walkway is encouraged.
OS207.2	Proposed Plan Change No. 81 > Maps > Area Maps > 03 - Proposed PC81 - Area - Mapua, Aranui Rd	Amend	A (reasonably direct) continuous public pedestrian and cycle connection from Lionel Place (or nearby on Higgs Road) through to Aranui Road Village Area. Delivery of that connection during the first stage of future development, or before occupation of a specified number of new dwellings.	Proposal shows deleting indicative walkway and roads that would offer a direct connection for parts of Higgs Road and Lionel Place to Aranui Road (specifically the village.) My concern is that these are not replaced with a pedestrian / cycle friendly direct access route, which means that people are less likely to walk / cycle to the village and more likely to drive, contributing congestion on the roads and parking spaces. Making Mapua a walking and cycling-friendly place to live is key to maintaining it's current calm village feel.-	Submitter seeks a continuous pedestrian and cycle path from Lionel Place to Aranui Road Village during early development stages. They oppose removing direct walkway and road connections. Concerned removal reduces walking and cycling, increasing traffic and parking issues. Supports making Mapua more walk and cycle friendly to preserve village character.
OS207.3	Proposed Plan Change No. 81 > Maps > Area Maps > 06 - Proposed PC81 - Area - Mapua, Mapua Dr - Higgs Rd	Oppose	Retain the existing indicative reserve adjoining Lionel Place in its current location, or amend the Plan so that one of the required neighbourhood parks is located near this prominent local high point.	I request that the indicative reserve adjoining Lionel Place be retained (not deleted), or that one of the required neighbourhood reserves be located around this prominent local high point. The site is highly contoured, and this area forms part of the visible skyline between Lionel Place / the existing development, and the proposed new development. Retaining it as open space would preserve a recognisable element of the natural landform, provide visual relief from housing, and prevent development from occupying every prominent high point. The location is also a practical midpoint between the existing and the new development. A reserve here could serve both	The submitter opposes the proposal and seeks to retain the existing indicative reserve near Lionel Place or relocate a neighbourhood park to this high point. They want to preserve natural landform, provide visual relief, and create a shared recreational space between existing and new developments.

				communities, provide a shared place for recreation and social connection, and help integrate the new development with the established neighbourhood.	

Sally Gaffney

Submitter 208

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS208.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 58 - Proposed PC81 - Zone - Takaka, Puramahoi	Oppose	I OPPOSE the proposed residential allocation and intensification of Site T-140.	**Isolation from the Primary Urban Node and Failure of Compact Urban Form:** Site T-140 is located exactly 5 kilometres outside the Tākaka township urban boundary. Upzoning this isolated rural parcel violates fundamental urban planning principles of creating a "compact urban form." Good urban design dictates that new residential growth must be contiguous with or directly adjacent to existing urban town boundaries. Approving a high-density development separated from Tākaka by kilometres of working rural land promotes fragmented, "leap-frog" sprawl into an established rural environment. **Total Private Vehicle Dependency and Contradiction of Emissions Targets:** Because the site sits 5 kilometres along a high-speed state highway corridor, future residents will have zero practical access to walkable or cyclable infrastructure, public transport options, or local employment. Every single household errand, school drop-off, medical appointment, and grocery trip will require a private vehicle commute on State Highway 60. This locks in 100% private vehicle dependency for up to 42 households. This directly contradicts the Nelson Tasman Future Development Strategy's explicit strategic goals to reduce transport emissions, minimize car-dominated developments, and support active transport links **Traffic Safety and Corridor Integrity:** State Highway 60 (Takaka-Collingwood Highway) is a high-speed, heavy-vehicle rural freight corridor. The creation of a high volume of new residential vehicle crossings or a major shared intersection to support up to (the currently proposed) 42 lots compromises transport safety. Site T-140 is explicitly evaluated for unserviced living. Introducing high-density detached lots without	Decline the proposed upzoning of Site T-140. Retain the full 127-hectare property under its current Rural 2 planning framework to preserve the productive integrity, landscape value, and traffic safety of the Puramahoi rural corridor.

				reticulated council wastewater and water infrastructure introduces a severe environmental risk. Onsite eco-septic fields and independent water bores at this scale risk long-term groundwater contamination and failure during peak seasonal use, conflicting with the Nelson Tasman Land Development Manual guidelines. **Stormwater Accumulation:** The replacement of flat grazing pastures with hardstand surfaces (roofs, concrete, driveways) will dramatically increase stormwater runoff. The site cannot safely absorb or divert this volume of water onsite without creating localized pooling or flooding risks onto adjacent properties and State Highway 60. **Loss of Productive Rural 2 Soils:** The front paddocks of this 127-hectare title represent highly versatile, flat agricultural land previously utilized as a functional dairy holding. Carving up these active flats violates the primary objective of the Rural 2 Zone to shield productive agricultural assets from irreversible urban encroachment and residential fragmentation. **Reverse Sensitivity and Amenity Degradation:** Establishing a dense residential cluster directly adjacent to a working rural hinterland creates immediate operational conflicts. Inevitable complaints regarding standard, permitted farming actions (such as tractor operations, stock movements, and spraying) threaten the viability of neighbouring working farms. This development fundamentally degrades the established, low-density rural amenity and quiet character of the Puramahoi area. **Risk of Plan Mutation and Uncontrolled Creeping Density:** While the current proposal outlines a restricted, low-density layout of 42 dwellings, approving this zoning amendment establishes an irreversible residential precedent. Once this Rural 2 land is successfully brought into a residential growth overlay, the council loses long-term control over its final density. Evolving central government mandates and future resource consent applications can easily bypass the initial 42-dwelling master plan. The council cannot assess this proposal based on a conservative starting number; it must evaluate the environmental, infrastructure, and traffic	

				impacts of the site's maximum theoretical development capacity. If private communal infrastructure is upgraded in the future, this site could easily scale up to over 150 standard suburban lots, causing severe, unintended impacts on the Puramahoi corridor.	

Philip Gaffney

Submitter 209

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS209.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 58 - Proposed PC81 - Zone - Takaka, Puramahoi	Oppose	I request that the Hearing Panel: 1. Reject the proposed Rural Residential rezoning of Site T-140a. 2. Retain the existing Rural Zone for the site. 3. Direct future residential growth to locations contiguous with the existing urban area of Tākaka where infrastructure, transport, and community services can be provided more efficiently. 4. Give greater weight to the protection of productive rural land and the maintenance of a compact urban form when determining the final provisions of Proposed Plan Change 81.	1. Loss and fragmentation of productive rural land The rezoning would permanently remove rural land from productive use and fragment the rural landscape through lifestyle subdivision. Once rural land is converted to rural residential use, it is effectively lost for future agricultural production. Rural residential development also creates reverse sensitivity effects, including complaints about farming activities such as machinery noise, stock movements, spraying, and seasonal operations. These conflicts can constrain neighbouring farming activities and reduce the long-term viability of productive rural land. Given increasing national emphasis on protecting highly productive land and maintaining opportunities for food production, rural residential development should only occur where there is a clear strategic justification. That justification has not been demonstrated for Site T-140a.2. Inconsistent with compact and efficient settlement patterns One of the key objectives of Proposed Plan Change 81 is to promote well-	**Submission opposes rezoning Site T-140a to Rural Residential.** Key concerns include loss of productive rural land and fragmentation, leading to reverse sensitivity issues. The proposal conflicts with compact urban growth principles, encouraging car-dependent development away from Tākaka's urban area. Access via State Highway 60 remains unresolved, raising safety concerns. Sufficient residential capacity exists elsewhere, so rezoning is unnecessary. Cumulative effects threaten rural character and productivity.

				planned, efficient urban growth that makes effective use of existing infrastructure. Site T-140a lies outside the existing urban area of Tākaka and would encourage dispersed, car-dependent development rather than strengthening the existing township. Future residents would rely almost entirely on private vehicles to access employment, schools, shops, health services and community facilities. This is inconsistent with the principles of compact urban form, reduced transport emissions and efficient infrastructure investment that underpin contemporary urban planning. Growth should instead be directed towards sites adjoining the existing urban area where services and facilities are already available. 3. State Highway 60 access has not been satisfactorily resolved Access to Site T-140a is a significant concern. State Highway 60 is the principal transport corridor serving Golden Bay. Rural residential development would increase vehicle movements, including right-turn movements across a high-speed state highway. Council's own infrastructure assessments identify transport access as a key constraint and note that development would require carefully designed access arrangements in consultation with NZ Transport Agency Waka Kotahi. At present, there is insufficient evidence that safe and efficient access can be achieved without adversely affecting the operation and safety of the state highway. Rezoning should not proceed until these transport issues have been fully	

				resolved. 4. The rezoning has not been shown to be necessary Council's growth assessments indicate that Golden Bay already has sufficient residential development capacity for projected population growth through existing residential land and other proposed growth areas around Tākaka. Additional residential opportunities are already proposed at locations such as Park Avenue, Rototai Road and other sites that are more closely integrated with the existing township. Given this available capacity, there is no compelling need to rezone productive rural land at Site T-140a. 5. Cumulative effects Although Site T-140a may appear relatively modest in isolation, approval would contribute to the gradual spread of rural residential development in Golden Bay. Over time this can: · reduce rural character; · fragment productive land; · create additional pressure for further rezoning along the highway corridor; and These cumulative effects should be carefully considered when assessing whether the proposed rezoning is the most appropriate planning outcome.	

Anthea Ellison

Submitter 210

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS210.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 58 - Proposed PC81 - Zone - Takaka, Puramahoi	Oppose	I seek the following decision from the Tasman District Council: - Decline the proposed upzoning of	My submission is based on the following reasons: - It rezones and breaks up productive	The submitter opposes the upzoning of Site T-140, seeking to keep the 127-hectare area as Rural 2 to protect agricultural land, landscape, and traffic safety.

			Site T-140. - Retain the full 127-hectare property under its current Rural 2 planning framework to preserve the productive integrity, landscape value, and traffic safety of the Puramahoi rural corridor.	agricultural land which should be preserved. - It is out of the immediate urban area. Other areas already adjacent to the Takaka township have been identified in the plan with the provision of 170 dwellings. - There is a risk of plan mutation and development creep. This will degrade the existing low density rural amenity and quiet character of the Puramahoi area. - Run-off and storm-water accumulation will pose an environmental hazard. - There is no town water or water reticulation services which creates an environmental risk. - There is no public transport, walkways or cycles ways for alternative transport option for those who do not or are unable to drive. - Allowing for at least 2 cars per dwelling this will significantly Increase traffic volume onto State Highway 60, a corridor of fast, heavy freight rural traffic, producing a safety issue. - The size of the lots means that the dwellings built will exclude low-income households, identified as the cohort who are most in need of primary housing, as they will be too expensive. - New housing here is not required as Golden Bay has an abundance of homes that remain empty for most of the year and rented out as holiday homes. How will the Council ensure these developments are made available to families in need and not used as second homes or holiday homes?	Concerns include loss of productive land, environmental risks from runoff, lack of water services and public transport, increased traffic on State Highway 60, and exclusion of low-income families. They question the need for new housing given many empty holiday homes in Golden Bay.

Elaine Fisher

Submitter 211

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS211.1	Proposed Plan Change No. 81 > Maps > Area Maps > 06 - Proposed PC81 - Area - Mapua, Mapua Dr - Higgs Rd	Oppose	I request that TDC reverses its decision to delete the indicative reserve on land marked for development adjacent to Lionel Place Mapua. – see Update Map: 80-06	This area should be retained as reserve because: · It is low lying and prone to holding surface water in heavy rain: · creates an important community amenity · retains some of the existing landscape character of the area · create a green buffer between existing houses and future development	**Summary of Submission:** The submitter opposes the removal of the indicative reserve near Lionel Place, Mapua. They request TDC to reverse its decision and retain the reserve. Reasons include the area's low-lying nature prone to water pooling, its value as a community amenity, preservation of landscape character, and providing a green buffer between existing and future homes.

Peter and Jane Duncan

Submitter 212

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS212.1	2-Out of Scope	Amend	We would like to propose the installation of speed warning signs which alert drivers to the speed they are travelling at, one at each end of the undulating section of Hill Street. This is required now.	The traffic volume and mix of vehicles has changed over the period of almost 7 years we have lived here due to urban growth and also heavy trade vehicles involved in the construction of subdivisions and buildings in the area. The intersection, where Washbourn Drive meets Hill Street, sits in a hollow between humps on Hill Street and has become more dangerous due to the speed many of these vehicles travel at as they descend the slopes from either direction. We expect the same will be happening in the next hollow north. Another danger issue, particularly in the mornings at this time of the year, is sun strike as vehicles come over the humps. We venture out onto Hill Street with caution as we can't be sure of the approaching speed and whether the driver has seen us. That's quite aside from the performance cars whose drivers like to lose traction on our corner	**Submission Summary:** The submitter requests speed warning signs at both ends of an undulating section of Hill Street. They are concerned about increased traffic volume and heavy vehicles due to urban growth and construction. Safety risks include speeding vehicles descending slopes, poor visibility at intersections, and sun glare in the mornings. They highlight the danger to pedestrians and note issues with drivers of performance cars losing traction on corners.

Ngati Rarua Atiawa Iwi Trust

Submitter 213

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS213.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	While Whakarewa generally supports PC81, we request that Council:
			
			• Retain and confirm the proposed Papakāinga zoning for Whakarewa lands at:
			  • 82–84 Pā Street, Motueka
			  • Te Uma / 188 College Street, Motueka.
			• Ensure papakāinga objectives and policies remain clear, strong and enabling.
			• Retain a broad interpretation of papakāinga that allows residential, cultural, social, environmental and economic activities associated with tangata whenua occupation of ancestral whenua.
			• Ensure that future implementation of PC81 maintains flexibility for Māori housing and papakainga initiatives, Community Housing Provider models, and intergenerational development.
			• Continue ongoing engagement with Te Tauihu iwi during implementation and future plan development.
				Introduction
				
				Ngāti Rārua Ātiawa Iwi Trust (Whakarewa) appreciates the opportunity to submit on Proposed Plan Change 81 (Urban Growth) and Proposed Change 1 to the Tasman Regional Policy Statement.
				
				Whakarewa generally supports the direction of Plan Change 81. The proposed changes recognise the need for increased housing supply, greater housing diversity, urban growth planning, and stronger alignment between infrastructure and future development.
				
				Importantly, PC81 represents a significant opportunity to remove long-standing barriers to papakāinga development and better recognise the relationship of Whakarewa with their ancestral lands.Whakarewa strongly supports provisions within PC81 that enable papakāinga development and Māori housing outcomes.
				
				The Trust has worked alongside Tasman District Council, Te Tauihu iwi and the TDC planning team over an extended period to identify constraints within the current Tasman Resource Management Plan that hinder papakāinga development and limit Māori housing aspirations. Those discussions consistently identified:
				
				• Incomplete and unclear policy guidance.
				• Inconsistent treatment of papakāinga across zones.
				• Unnecessary regulatory complexity.
				• Limited opportunities for cultural, social and economic activities to occur alongside housing.
				• Lack of flexibility for long-term intergenerational development on ancestral whenua.
				
				Support for Papakāinga Provisions
				
				Whakarewa supports amendments that create a more enabling framework for papakāinga development. PC81 should continue to recognise and provide for the relationship of tangata whenua with their ancestral lands, waters, sites, wāhi tapu and other taonga, and give practical effect to the aspirations of Māori and mana whenua.
				
				Support for Rezoning of Whakarewa Lands
				
				Whakarewa strongly supports the proposed rezoning of:
					Whakarewa supports PC81, requesting retention of Papakāinga zoning at 82–84 Pā Street and 188 College Street, Motueka. They seek clear, strong policies enabling papakāinga with a broad definition covering cultural, social, environmental, and economic activities. Flexibility for Māori housing, Community Housing Providers, and intergenerational development is vital. Ongoing engagement with Te Tauihu iwi is also requested to ensure successful implementation and future planning.

				• 82–84 Pā Street, Motueka; and • Te Uma / 188 College Street, Motueka to Papakāinga (Māori Purpose) zoning. These sites hold significant cultural, historical and strategic importance to Whakarewa. The rezoning provides a pathway to deliver future housing opportunities for whānau while also supporting restoration, cultural activities, education, health services, community facilities and other kaupapa Māori initiatives. The rezoning will assist in bringing whānau back onto whenua, strengthening cultural connections, and supporting intergenerational wellbeing. Furthermore, if one of the key purposes of PC81 is aligning development with infrastructure planning, then infrastructure staging and servicing requirements should not unnecessarily constrain papakāinga development where practical and culturally appropriate servicing solutions can be achieved. **Support for an Enabling Definition of Papakāinga** Whakarewa supports retaining a broad and enabling definition of papakāinga. A papakāinga is more than a residential subdivision. It is a living community that provides for cultural identity, housing, education, environmental stewardship, economic development, social connection and intergenerational wellbeing. Papakāinga development supports and enhances connections among housing, cultural sites, urupā, restoration areas, and wider cultural landscapes. Whakarewa considers that papakāinga development and environmental restoration are mutually reinforcing outcomes. The planning framework should support integrated developments that combine housing, cultural revitalisation, biodiversity enhancement, riparian restoration, indigenous planting, climate resilience initiatives, and the protection of culturally significant sites. Such an approach reflects the principles of kaitiakitanga and supports the long-term social, cultural, environmental and economic wellbeing of current and future generations **Housing and Community Outcomes**	

				Whakarewa supports the broader objectives of PC81 that increase housing choice and improve housing affordability.
				
				The Trust's housing strategy identifies papakāinga development as a key mechanism for:
				
				• Returning whānau to whenua.
				• Supporting affordable housing pathways.
				• Strengthening iwi identity and wellbeing.
				• Creating opportunities for future Community Housing Provider initiatives.
				• Supporting long-term social, environmental and economic outcomes.
				
				The planning framework should continue to provide sufficient flexibility for these aspirations to be realised and should support Māori-led affordable housing and Community Housing Provider models, recognising their role in addressing Māori housing need and improving housing affordability.
				
				Requested Amendments
				
				While Whakarewa generally supports PC81, we request that Council:
				
				• Retain and confirm the proposed Papakāinga zoning for Whakarewa lands at:
				  • 82–84 Pā Street, Motueka
				  • Te Uma / 188 College Street, Motueka.
				• Ensure papakāinga objectives and policies remain clear, strong and enabling.
				• Retain a broad interpretation of papakāinga that allows residential, cultural, social, environmental and economic activities associated with tangata whenua occupation of ancestral whenua.
				• Ensure that future implementation of PC81 maintains flexibility for Māori housing and papakainga initiatives, Community Housing Provider models, and intergenerational development.
				• Continue ongoing engagement with Te Tauihu iwi during implementation and future plan development.
				
				Conclusion
				
				Whakarewa supports Proposed Plan Change 81 subject to the matters raised above.
				
				PC81 provides an important opportunity to enable papakāinga development, increase housing choice, strengthen whānau	

				connections to whenua, and support long-term cultural, social, environmental and economic wellbeing. We wish to be heard at any hearing relating to this submission.	
OS213.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 39 - Proposed PC81 - Zone - Motueka, Cnr Atkins St - Pa St	Support	Whakarewa strongly supports the proposed rezoning of: - 82–84 Pā Street, Motueka;	These sites hold significant cultural, historical and strategic importance to Whakarewa. The rezoning provides a pathway to deliver future housing opportunities for whānau while also supporting restoration, cultural activities, education, health services, community facilities and other kaupapa Māori initiatives. Refer to original submission for more information	**Summary of submission:** Whakarewa supports rezoning 82–84 Pā Street, Motueka. They highlight the site's cultural, historical, and strategic importance. Rezoning is seen as a way to enable housing for whānau and support cultural, educational, health, and community initiatives. The submission emphasizes benefits for kaupapa Māori activities.
OS213.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 40 - Proposed PC81 - Zone - Motueka, Cnr Motueka Valley Hwy - College St	Support	Whakarewa strongly supports the proposed rezoning of: Te Uma / 188 College Street, Motueka	These sites hold significant cultural, historical and strategic importance to Whakarewa. The rezoning provides a pathway to deliver future housing opportunities for whānau while also supporting restoration, cultural activities, education, health services, community facilities and other kaupapa Māori initiatives. Refer to original submission for more information	**Summary of Submission:** Whakarewa supports the proposed rezoning of Te Uma / 188 College Street, Motueka. They highlight the site's cultural, historical, and strategic importance. Rezoning will enable future housing for whānau and support restoration, cultural activities, education, health, community facilities, and kaupapa Māori initiatives.

Rebecca & Hayden Martine

Submitter 214

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS214.1	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Oppose	**Point 1: Road Elevation and Ground Level Disparity** **Decision Sought:** We request that Council mandate the lowering of the road's finished ground level to match or sit below the existing residential property level of 7 Coppermine Crescent and move it further away from the immediate proximity of our property. If lowering is not fully achievable, substantial engineered retaining walls and safety barriers must be constructed entirely within the road reserve at the developer's expense with consultation with us to be had to come to mutual agreement including the layout of the road in proximity of our boundary fences.	**Point 1: Road Elevation and Ground Level Disparity** **Reason:** The designated land for the proposed road sits at a higher elevation than our residential property and it very close to our boundary fences. This height disparity exacerbates privacy issues, as vehicles and pedestrians will directly look down into our backyard and living spaces. It also creates a severe structural risk regarding retaining wall stability and earth pressure against our property.	The submitter opposes the proposal due to road elevation, privacy, and stormwater concerns. They seek lowering the road to or below their property level and sound barriers for privacy. Traffic calming measures and strict stormwater controls are requested to protect safety and prevent flooding. Construction impacts require limited hours, dust control, and noise management. Ongoing consultation with the Council is essential to address these issues and protect their residential amenity.

			Point 2: Residential Boundary Privacy and Acoustic Screening **Decision Sought:** We request that Council mandate the installation of a high-quality, continuous acoustic timber fence or a substantial engineered green buffer zone (using dense native landscaping) between the new road reserve and the boundary of 7 Coppermine Crescent to mitigate acoustic impact. Consultation with us to come to a mutual agreement. **Point 3: Traffic Calming and Speed Management** **Decision Sought:** We request that the road design incorporate **built-in traffic calming measures**, such as raised tables, or narrow clear-carriage designs, ensuring speeds are structurally managed to a safe limit. **Point 4: Stormwater and Overland Flow Path Risks** **Decision Sought:** We ask that the Council require explicit civil engineering designs proving that **100% of the road's stormwater runoff is collected and diverted entirely away** from the existing boundaries of 7 Coppermine Crescent, utilising catchpits that do not place water pressure on our land. **Point 5: Construction Phase Impacts** **Decision Sought:** We request that any approved resource consent or works plan includes strict conditions limiting construction operations to **7:30 AM – 5:00 PM, Monday to Friday**, with mandatory dust suppression measures (watering) deployed at all times during earthworks and courtesy when it comes to excessive noise. **Summary of Outcomes Sought** We require full and ongoing communication from the Tasman District Council regarding the proposed road layout and all stages of its future implementation. The layout, in its current unmitigated form, is not acceptable and must be declined pending the provision of further detailed information. We understand the strategic reasoning behind this road for the future development of Brightwater area but we ask approval should only be granted subject to the inclusion of road elevation lowering, structural boundary fencing, strict stormwater-containment protections, and active speed-calming infrastructure along with acoustic screening along with consultation with us. These measures are essential to ensuring	**Point 2: Residential Boundary Privacy and Acoustic Screening** **Reason:** The proposed road sits directly beside and behind our residential boundary line. Increased vehicle traffic, headlights, and pedestrian movements will cause a direct loss of privacy to m backyard and indoor living areas as the land currently sits higher than our property. **Point 3: Traffic Calming and Speed Management** **Reason:** Introducing a new connective road infrastructure behind an established residential pocket introduces risks of through-traffic as Brightwater expands. High vehicle speeds will directly impact the safety and quiet enjoyment of properties along Coppermine Crescent. **Point 4: Stormwater and Overland Flow Path Risks** **Reason:** Developing a new asphalt or chip-seal road surface introduces a significant area of impermeable land right behind and beside our property lines. Improper stormwater engineering risks causing surface flooding or water pooling against the side and rear fences. **Point 5: Construction Phase Impacts** **Reason:** Heavy machinery working immediately next to our boundary lines will cause severe vibration, airborne dust, and noise disruptions. Rebecca does work from home on a full time basis in a professional capacity.	

			safety, environmental responsibility, and the protection of affected properties. We look forward to receiving confirmation of the revised conditions and the plan going forward. Thank you for considering our feedback. Please confirm receipt of this submissions and keep us updated on future hearing dates.		

Dan Montgomery

Submitter 215

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS215.1	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.10: Outline Spatial Plan - Mapua Seaton Valley	Oppose	I request that Plan Change 81 be amended to: • Apply the proposed 10-metre setback requirement to **all boundaries adjoining Rural Residential and Rural Residential Serviced properties** within the T42-a development area. • Apply landscape planting and screening requirements to **all boundaries adjoining Rural Residential and Rural Residential Serviced properties**, to provide a consistent buffer between existing rural living properties and new residential development. • Restrict dwellings located adjacent to Rural Residential and Rural Residential Serviced properties to **single-story buildings only**, to protect the amenity, outlook and rural character currently enjoyed by neighboring properties. **Alternative decision sought if Council declines the above relief:** • Decline the rezoning of the land adjoining Rural Residential and Rural Residential Serviced properties until appropriate provisions are included to adequately protect the amenity and rural character of affected neighboring landowners.	I am an owner/occupier residing on the boundary of the proposed T42-a subdivision area. At the outset, I wish to record my concern about the scale of growth proposed for Mapua. Within the local community there is widespread concern that continued expansion will fundamentally alter the character of our small coastal village and result in a form of urban development that is inconsistent with the qualities that make Mapua an attractive place to live. While I do not support the rezoning and subsequent development of this land, I acknowledge that Council has devoted considerable time and resources to the Mapua Master Plan process and is unlikely to revisit the broader strategic direction. Accordingly, I ask that the following concerns be addressed should the proposal proceed. **Boundary Setbacks and Screening** The proposed plan applies 10-metre setbacks and planting requirements to some, but not all, boundaries adjoining Rural Residential and Rural Residential Serviced properties. Given that the land is proposed to transition from Rural 1 zoning to standard-density residential development, this represents a significant change in amenity for existing residents who purchased properties adjacent to a rural landscape. To provide equitable treatment and maintain a reasonable level of amenity for neighboring landowners, the setback and landscape planting requirements should apply to all subdivision boundaries	The submitter opposes Plan Change 81 as it stands. They seek a 10m setback, landscape planting, and screening on all boundaries adjoining Rural Residential properties. They request dwellings next to these properties be limited to single-story to protect amenity and rural character. They also want controls on development of ridgelines and elevated sites to preserve landscape values. If not amended, they ask the rezoning be declined until protections are included.

				adjoining Rural Residential and Rural Residential Serviced properties. **Building Height Adjacent to Rural Residential Land** In addition to setbacks and planting, consideration should be given to limiting buildings adjoining Rural Residential and Rural Residential Serviced properties to single-story dwellings. This would help retain the rural outlook and character experienced by neighboring properties and reduce visual dominance effects. Such controls are particularly important on ridgelines and elevated sites, where building bulk and prominence can have a disproportionate impact on landscape values. The importance of protecting ridgeline character has already been recognised through the Mapua Master Plan process and should be reflected in the planning provisions applying to the development area. For these reasons, I request that the Plan Change be amended to require both enhanced boundary treatment and single-story development along all interfaces with Rural Residential and Rural Residential Serviced land.	
OS215.2	2-Out of Scope	Oppose	• Introduce specific controls to ensure that development on **ridgelines and elevated sites** does not adversely affect landscape character, visual amenity, or the rural outlook of adjoining properties. •		They also want controls on development of ridgelines and elevated sites to preserve landscape values.

NelsonTasman2050

Submitter 216

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS216.1	Proposed Plan Change No. 81	Support	Our submission therefore does not seek to alter the strategic direction of PC81. Instead, we believe there are opportunities to strengthen the Plan Change so that it not only enables more housing, but creates neighbourhoods that future generations will recognise as successful examples of quality urban development. Refer to original submission for more information	For many years, NelsonTasman2050 has advocated for a transition away from dispersed urban growth and towards compact, well-connected neighbourhoods that make more efficient use of infrastructure, provide greater housing choice and create healthier, more resilient communities. In many respects, Proposed Plan Change 81 represents an important step towards these objectives. We	The submitter supports PC81's overall direction, emphasizing compact, connected neighbourhoods. They seek improvements to ensure quality urban development alongside increased housing. The submission praises the move towards efficient infrastructure use,

				therefore strongly support the overall direction of the Plan Change. In particular, we support Council's commitment to increasing housing capacity within existing urban areas, enabling a greater diversity of housing types, introducing a Medium Density Residential Zone, and recognising the importance of quality urban design. These initiatives align well with national direction and with the evidence assembled to support the Plan Change.	housing diversity, and introducing a Medium Density Residential Zone. These changes align with national policies and support sustainable, resilient communities.
OS216.2	Proposed Plan Change No. 81	Support	Strengthen the Plan Change and future planning work to support neighbourhood planning, public spaces, community facilities, mixed-use neighbourhoods, local employment opportunities, vibrant centres, housing diversity, and monitoring of community outcomes.	The submitter considers successful urban environments are shaped by the quality of streets, parks, walking connections, centres, services, and community facilities, not just individual buildings. The submitter states that success should be measured by community wellbeing and the quality of neighbourhoods, rather than dwelling capacity alone.	The submitter seeks a stronger emphasis on creating high-quality neighbourhoods and complete communities, in addition to enabling housing growth.
OS216.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Amend	Strengthen the integration of land use and transport planning, support transport demand management, coordinate infrastructure investment with development, and pursue implementation initiatives such as master planning, regeneration projects, partnerships and mechanisms that encourage high-quality urban design.	The submitter considers urban form influences travel behaviour and that growth should reduce reliance on private vehicles. The submitter also considers that planning rules alone do not create successful places and that coordinated implementation and infrastructure planning are important to achieving quality urban development outcomes. These three points capture the submission's essence without over-fragmenting what is fundamentally a supportive strategic submission.	The submitter seeks greater integration of land use planning, transport planning, infrastructure investment, and implementation initiatives.
OS216.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Support	Retain the Design Matrix and investigate mechanisms that encourage or reward developments demonstrating outstanding urban design, environmental performance, or community benefit.	The submitter considers the Design Matrix to be one of the strongest aspects of PC81 and a significant improvement in design expectations. The submitter states it provides an important baseline for development quality but notes that planning systems should encourage exceptional outcomes as well as preventing poor ones.	The submitter supports the introduction of the Design Matrix and seeks continued improvement of urban design outcomes.

Leanne Reiha

Submitter 217

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS217.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond	Oppose	I request that these Urban Growth rezoning under TRMP be revisited and reassessed for more areas outside of the	I strongly object to the proposed medium-density housing development in my residential area due to the significant adverse effects it is likely to have on the existing community and neighbourhood amenity.	The submitter opposes the proposed medium-density housing near Richmond CBD.

			residential area surrounding the CBD of Richmond.	The increased concentration of housing will result in overcrowding and place additional pressure on local infrastructure, roads, and community services that were not designed to accommodate such intensive development. The proposal is also likely to exacerbate parking shortages, as insufficient off-street parking will inevitably lead to increased on-street parking, traffic congestion, and reduced road safety for residents, pedestrians, and emergency vehicles. On-street parking is already very limited with the introduction of yellow no parking lines associated with cycles lanes. The introduction of buildings up to 14 metres in height is out of character with the surrounding low-density residential environment and will fundamentally alter the established town character, replacing open, spacious neighbourhoods with a more urban and congested streetscape. These taller buildings will also result in the loss of sunlight, daylight, and valued views for neighbouring properties through increased overshadowing, adversely affecting residents' enjoyment of their homes, outdoor living spaces, and gardens. Furthermore, a higher population density will inevitably generate increased noise from residents, visitors, vehicles, and everyday activities, reducing the peaceful residential environment currently enjoyed by the community. Collectively, these impacts will diminish the amenity, liveability, and unique character of the area, with long-term consequences for existing residents that outweigh the perceived benefits of the proposed development.	They request rezoning be reconsidered for areas outside existing residential zones. Concerns include overcrowding, strain on infrastructure, parking shortages, and traffic congestion. They argue 14m buildings are out of character, causing loss of sunlight, views, and increased noise. Overall, they believe the development will harm community amenity, liveability, and neighbourhood character.
OS217.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond	Oppose	I request that these Urban Growth rezoning under TRMP be revisited and reassessed for more areas outside of the residential area surrounding the CBD of Richmond.	I strongly object to the proposed medium-density housing development in my residential area due to the significant adverse effects it is likely to have on the existing community and neighbourhood amenity. The increased concentration of housing will result in overcrowding and place additional pressure on local infrastructure, roads, and community services that were not designed to accommodate such intensive development. The proposal is also likely to exacerbate parking shortages, as insufficient off-street parking will inevitably lead to increased on-street parking, traffic congestion, and reduced road safety for residents, pedestrians, and emergency vehicles. On-street parking is already very limited with the introduction of yellow no parking lines associated with cycles lanes. The introduction of buildings up to 14 metres in height is out of character with the surrounding low-density residential environment and will fundamentally alter the established town character, replacing open, spacious neighbourhoods with a more urban and congested streetscape. These taller buildings will also result in the loss of sunlight, daylight, and valued views for neighbouring properties through increased overshadowing, adversely affecting residents' enjoyment of their homes, outdoor living spaces, and gardens. Furthermore, a higher population density will inevitably generate increased noise from residents, visitors, vehicles, and everyday activities, reducing the peaceful residential environment currently enjoyed by the community.	**Submission Summary:** The submitter opposes the proposed medium-density housing rezoning near Richmond’s CBD. They seek a reassessment to include more areas outside the current residential zone. Concerns include overcrowding, strain on infrastructure, parking shortages, and increased traffic risks. They highlight that 14m-high buildings clash with the low-density character, causing loss of sunlight, views, and increased noise. Overall, they believe these changes harm community amenity and livability.

				Collectively, these impacts will diminish the amenity, liveability, and unique character of the area, with long-term consequences for existing residents that outweigh the perceived benefits of the proposed development.	
OS217.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	I request that these Urban Growth rezoning under TRMP be revisited and reassessed for more areas outside of the residential area surrounding the CBD of Richmond.	I strongly object to the proposed medium-density housing development in my residential area due to the significant adverse effects it is likely to have on the existing community and neighbourhood amenity. The increased concentration of housing will result in overcrowding and place additional pressure on local infrastructure, roads, and community services that were not designed to accommodate such intensive development. The proposal is also likely to exacerbate parking shortages, as insufficient off-street parking will inevitably lead to increased on-street parking, traffic congestion, and reduced road safety for residents, pedestrians, and emergency vehicles. On-street parking is already very limited with the introduction of yellow no parking lines associated with cycles lanes.	The submitter opposes the Urban Growth rezoning under TRMP. They request reassessment to include areas beyond Richmond's CBD residential zone. Concerns include overcrowding, strain on infrastructure, and reduced neighborhood amenity. They highlight parking shortages worsening traffic congestion and road safety due to limited off-street parking and existing no-parking zones.

Ivan Stevens

Submitter 218

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS218.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Amend	reduce the height limit to 8m delay giving effect to this plan change until a comprehensive transportation strategy, with sufficient funding for implementation is approved.	17.1A.3.2 l)i) Height restriction adjustment for Richmond Central will negatively impact the outlook from my property. **17.1A.3.2 general - the proposed intensification without a coherent transportation plan will cause significant congestion and safety issues in surrounding areas.** Cresent st is already effectively one way during business hours. mode shift is not a viable mitigation to this problem without significant investment which is currently not planned or budgeted for in your LTP.	The submitter requests lowering the height limit to 8m and delaying the plan change until a funded transportation strategy is approved. They are concerned that higher buildings will harm their property's outlook. They also highlight that intensification without a clear transport plan will worsen congestion and safety, especially on Crescent Street, which is already overloaded during business hours. They doubt mode shift can fix these issues without major investment.

John Broadbent

Submitter 219

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS219.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	No road But a Cycleway instead.	I oppose the proposed road between Stringer Rd and Redmill Rd. As a resident on Redvale Rd - we already have all of the traffic for the estate going past our house including huge and very loud earth moving trucks, tradesmen vehicles, utility vehicles with trailers - essentially the loudest work vehicles you can name going past on a consistent basis. Creating another road will only add more traffic to that. Traffic that by the way - goes down our road way too fast and consistently over the speed limit. What I would support is the walkway connecting the two roads - a walkway with cycle path. As it is - it is very dangerous to ride my bike around the area and I would love to be able to eventually cycle to Mapua via a safe cycle path. An interconnecting walkway and cyclepath between Redmill and Stringer would at least allow access to the underpass to Westmere Rd from Stringer which is safer and easier way to get across the busy highspeed highway.	The submitter opposes the proposed road between Stringer Rd and Redmill Rd. They experience heavy, noisy traffic on Redvale Rd and worry a new road will increase this. They support a safe walkway and cycle path instead. They want a safe route to cycle to Mapua and access the underpass to Westmere Rd. Speeding and traffic safety are key concerns.

Jean Gorman

Submitter 220

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS220.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	I ask that Council reconsider the growth assumptions underlying PC81 and adopt a more conservative, evidence-based projection for these villages. Reconsider whether growth provisions should apply to Brightwater, Wakefield, Māpua and Motueka as part of Richmond's urban environment.	Projections rely on recent short-term growth rates rather than longer-term trends and believes growth assumptions are not supported by local employment, migration trends, or seismic risk considerations. Commuting patterns should not be the primary basis for classifying the villages as part of Richmond's urban environment and considers infrastructure, service provision, and transport costs more relevant considerations. Refer to original submission for more information	The submitter seeks reconsideration of the population growth assumptions used in PC81 for the villages, Brightwater, Māpua and Wakefield. Commuting Should Not Define These Villages as Part of Richmond's Urban Environment. Refer to original submission for more information

OS220.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 61 - Proposed PC81 - Zone - Wakefield Central	Amend	Careful management of this area if put to commercial use. Refer to original submission for more information	Some of the areas of Wakefield (29.1) proposed for infill have water problems and are unsuitable: The corner of Treeton Place and Edwards St floods due to hill runoff from the area south of the plot. This water then flows on and affects properties in Pitfure Rd designated T-30. This area would need careful management if put to commercial use.	Due to water problems the site on the corner of Treeton Place and Edwards St this area would need careful management if put to commercial use.
OS220.3	Proposed Plan Change No. 81 > Maps > Area Maps > 27 - Proposed PC81 - Area - Wakefield Central	Amend	Add walkway from Louden Place to Edwards St	A walkway should be created from the new development from Louden Place to Edwards St, it would then meet provisions (c), (d), and (e) of the National Policy Statement "Well-Functioning Urban Environment", Objective 1, Policy1.	Add walkway from Louden Place to Edwards St to align with provisions (c), (d), and (e) of the National Policy Statement "Well-Functioning Urban Environment", Objective 1, Policy1.
OS220.4	Proposed Plan Change No. 81 > Maps > Area Maps > 28 - Proposed PC81 - Area - Wakefield, Bird Ln	Amend	Add wetland to T-194b along Pitfure Stream to increase detention in the area	It is not correct to say that "there is no waterbody in proximity to the proposed development area, T-194". The Pitfure flows next to, if not through the area. Its catchment is 11km sq. It overflows regularly along Higgins Rd, closing it several times a year, and it occasionally floods houses in Wanderer's Way in Brightwater. Increased runoff from housing developments in Wakefield will exacerbate these problems. T-194 seems a suitable area for development, however, given that runoff would increase the flow of the Pitfure, a large detention area would be needed. It would be sensible to create a wetland to increase detention here. Given the important recharge from site T-194 to the unconfined aquifer to the north – which most of the farms and inhabitants of Higgins Rd use, a wetland in conjunction with the housing development would be an excellent solution This would comply with PC 81: 5.1B (x) The proposal does not adversely affect freshwater bodies including groundwater recharge and riparian function; and 5.1B (xi) The proposed development is resilient to natural hazards and likely current and future effects of climate change.	
OS220.5	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects	Amend	Provide community gardens and allotment space within new urban development areas.	Community gardens support community needs, local food production, open space, recreation and resilience. Refer to original submission for more information	Provide community gardens and allotment space within new urban development areas.
OS220.6	Proposed Plan Change No. 81 > Maps > Zone Maps	Amend	Support medium-density housing in central Richmond, but not at low elevation near sea level.	I support medium-density housing in central Richmond, but not at low elevation near sea level, as has occurred with some recent developments in Lower Queen St. The terrain there is temptingly flat, but given the unpredictability of sea-level rise over the 50–70 year lifetime of these developments, more caution is warranted. Older residents remember the 1960 and 1964 tsunamis — generated by earthquakes in Chile and Alaska respectively — which would be disastrous if repeated today. The LIDAR map showing mean sea level (MSL) as the zero datum does not help in this regard. Developers I have spoken with are	I support medium-density housing in central Richmond, but not at low elevation near sea level,

				convinced that LIDAR zero represents high water — in their terms, “sea level.” This is not the case: Mean High Water Springs sits 2.6m above Mean Sea Level, even without weather considerations. Refer to original submission for more information	

Heather Astell

Submitter 221

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS221.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond > 6.8.3 Policies	Oppose	Do not allow intensification to replace existing housing and do not replace with medium intensity housing in Richmond.	I am writing to oppose the intensification of Richmond described in 6.8.2.10. I oppose Plan Change 81 (in particular section 6.8.3.10) because the proposed housing intensification will significantly reduce the quality of life in Richmond. Increasing the number of dwellings on existing sections inevitably leads to houses being built much closer together, reducing natural light, privacy, and the peaceful character of our neighbourhoods. In practice, intensification also results in the removal of mature trees and a substantial loss of gardens and grassy areas where children can play, pets can exercise, and wildlife can thrive. While developments often include landscaping, this does not replace the amount or ecological value of the green space that is lost. More buildings, driveways, and paved surfaces create a hotter urban environment, reduce the land available for rainwater to soak into the ground, and increase the risk of surface flooding. In addition, because many intensified developments do not provide sufficient off-street parking, vehicles spill onto surrounding roads. Streets become lined with parked cars, making them narrower, reducing visibility, creating safety issues for drivers, cyclists, and pedestrians, and contributing to a cramped, congested feel that fundamentally changes the character of Richmond. I believe growth should be planned in a way that balances the need for additional housing with the protection of green space, neighbourhood amenity, and the long-term wellbeing of residents. Please refer to this document : https://www.knowledgeauckland.org.nz/media/nshi5alc/tr2024-06-life-in-medium-density-housing-in-tāmaki-makaurau-auckland.pdf However I do not believe this document adequately reflects the true impacts of housing intensification. It suggests that careful planning and good design can largely mitigate the adverse effects of increased density. However, in reality, even well-designed intensification can still have significant negative consequences for residents' quality of life. Reduced privacy, loss of green space, diminished natural light, increased urban heat, greater reliance on on-street parking, and a more crowded built environment are inherent outcomes of higher-density development that cannot be fully eliminated through design alone.	**Submission opposes intensification in Richmond under Plan Change 81.** Concerns include loss of privacy, natural light, and neighborhood character due to closer housing. Highlights removal of mature trees and green spaces, impacting play areas and wildlife. Notes increased urban heat, flooding risks, and insufficient parking causing street congestion and safety issues. Requests growth planning that balances housing needs with green space and resident wellbeing. Disagrees that design alone can mitigate these negative effects.

OS221.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Do not allow intensification to replace existing housing and do not replace with medium intensity housing in Richmond.	I am writing to oppose the intensification of Richmond described in 6.8.2.10. I oppose Plan Change 81 (in particular section 6.8.3.10) because the proposed housing intensification will significantly reduce the quality of life in Richmond. Increasing the number of dwellings on existing sections inevitably leads to houses being built much closer together, reducing natural light, privacy, and the peaceful character of our neighbourhoods. In practice, intensification also results in the removal of mature trees and a substantial loss of gardens and grassy areas where children can play, pets can exercise, and wildlife can thrive. While developments often include landscaping, this does not replace the amount or ecological value of the green space that is lost. More buildings, driveways, and paved surfaces create a hotter urban environment, reduce the land available for rainwater to soak into the ground, and increase the risk of surface flooding. In addition, because many intensified developments do not provide sufficient off-street parking, vehicles spill onto surrounding roads. Streets become lined with parked cars, making them narrower, reducing visibility, creating safety issues for drivers, cyclists, and pedestrians, and contributing to a cramped, congested feel that fundamentally changes the character of Richmond. I believe growth should be planned in a way that balances the need for additional housing with the protection of green space, neighbourhood amenity, and the long-term wellbeing of residents. Please refer to this document : https://www.knowledgeauckland.org.nz/media/nshi5alc/tr2024-06-life-in-medium-density-housing-in-tāmaki-makaurau-auckland.pdf However I do not believe this document adequately reflects the true impacts of housing intensification. It suggests that careful planning and good design can largely mitigate the adverse effects of increased density. However, in reality, even well-designed intensification can still have significant negative consequences for residents' quality of life. Reduced privacy, loss of green space, diminished natural light, increased urban heat, greater reliance on on-street parking, and a more crowded built environment are inherent outcomes of higher-density development that cannot be fully eliminated through design alone.	**Submission opposes intensification in Richmond under Plan Change 81.** Concerns include loss of privacy, natural light, and neighborhood character due to closer housing. Highlights removal of mature trees and green spaces, impacting play areas and wildlife. Notes increased urban heat, flooding risks, and insufficient parking causing street congestion and safety issues. Requests growth planning that balances housing needs with green space and resident wellbeing. Disagrees that design alone can mitigate these negative effects.

Bruce Struthers

Submitter 222

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS222.1	Proposed Plan Change No. 81	Oppose	Reject Plan Change 81 in its entirety, including all proposed rezonings and development provisions affecting Māpua and Ruby Bay.	The submitter considers Plan Change 81 unnecessary, believes there is no demonstrated need for the proposed growth, and is concerned about adverse effects on village character, infrastructure capacity, traffic, costs to ratepayers, and community wellbeing.	**Submitter opposes Plan Change 81.** They seek full rejection of the plan, including all rezonings and development rules for Māpua and Ruby Bay. Their reasons include:

					• Belief that Plan Change 81 is unnecessary. • No proven need for the proposed growth. • Concerns about impacts on village character, infrastructure, traffic, ratepayer costs, and community wellbeing.

Wayne Wootton

Submitter 223

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS223.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Retain the existing Residential zoning apart from areas T237a, T237b, T240a and T240b. Retain the exiting and proposed Open Space zones	On behalf of Wootton Trustees Limited we oppose the Mixed Business and Deferred Mixed Business zones proposed for Mapua, apart from areas T237a, T237b, T240a and T240b. Our reasons are:- 1/ One of the attractions of living in Mapua is the coastal village feel which will be completely destroyed by intensification. 2/ The proposed changes are far in excess of the growth needs of Mapua and appear to be an attempt to cretae a suburb of Richmond to create for the future growth need of Richmond. 3/ There isn't the infrastructure of schooling, reserves, medical centers, supermarkets to support the level of projected population growth. 4/ There aren't the employment opportunities to support the level of development proposed which means Council are looking to cater for people who will work in Richmond or Nelson and commute. 5/ The roading network between Nelson/Richmond and Mapua is not designed to cater for increased volumes of traffic with severe bottle necks now occurring on Lower Queen Street and Gladstone Road. The proposed Hope Bypass may have assisted traffic movements between Richmond and Nelson, however Stage 2 from Richmond to Hope is now been dropped from the 10 year programme for Roads of National Significance by the Government/NZTA. 6/ The loss of existing and proposed open space through rezoning to a more intensive us is also a concern now that The Mapua Domain will be part of the settlement under the Nelson Tenths Bill. Although zoned Recreation, as land in private ownership the continued use as open apace is not guaranteed.	The submitter opposes Mixed Business zoning in Mapua, except for specified areas. They want to retain existing Residential and Open Space zones. Concerns include loss of coastal village character, excessive growth beyond local needs, inadequate infrastructure, limited local employment, and traffic congestion. They worry about losing open space, especially a local reserve valuable for wildlife and community use. They seek more protection for open spaces, not less.

				7/ Of immediate concern to us is the re-zoning of the adjoining reserve with is current zoned Open Space and held as a Local Purpose Reserve under the Reserves Act. It currently an asset which attracts many native birds with the open grass area used by the children in the neighborhood. The plan should be making provision for more open space and not less.	

Nic Jenkins

Submitter 224

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS224.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Oppose	**I request the following amendments to the proposed Medium Density Residential Zone:** • **Move the Medium Density Residential Zone boundary so that it does not include St James Avenue.** The boundary should instead be located along Richmond side of Otia Drive, which is a main thoroughfare and is more appropriate for accommodating higher-density residential development. Concentrating medium-density housing on the Richmond side of Otia Drive would better align with recognised planning principles of directing urban intensification to locations with greater transport capacity and reduced effects on established residential neighbourhoods. • **Exclude all properties on St James Avenue from the Medium Density Residential Zone**, retaining the existing residential zoning and preserving the established suburban character and amenity of the street. • **Zone the St James Avenue Reserve as Recreation.** On Map 80-51, 19 June 2026,it is not zoned Recreation. **References** TDC Update Map: 80-51 TDC TRMP Appendix 10- Open Space Assessment Richmond Ward Draft Richmond Ward Reserve Management Plan May 2025 TDC Urban Design Guide 15 December 2018 **Conclusion**	I oppose Proposed Plan Change 81 (PC81) insofar as it proposes to include St James Avenue within the Medium Density Residential Zone (MDRZ). The proposed rezoning would directly affect my property and the wider St James Avenue neighbourhood. While I acknowledge the need to provide additional housing capacity to meet future growth, I do not believe the inclusion of St James Avenue in the Medium Density Residential Zone represents good planning or achieves an appropriate balance between accommodating growth and protecting the amenity values of existing residential communities. The proposal does not adequately recognise the established character of St James Avenue or sufficiently manage the adverse effects that increased residential intensity would have on neighbouring properties. **Reasons for Opposition** **1. St James Avenue is not an appropriate location for medium-density development** St James Avenue is an established suburban street characterised by detached dwellings, generous setbacks, mature vegetation, private outdoor living areas, and a consistent low-density residential form. The proposed plan threatens privacy and sunlight to properties. The proposed Medium Density Residential Zone is inconsistent with these established characteristics. Rezoning part of the street would fundamentally alter its scale and character and would diminish the qualities that make it an attractive and desirable residential neighbourhood. St James Avenue has an existing covenant limiting housing height which does not align with the proposed Medium Density Residential Plan.	**Submission Summary:** The submitter opposes including St James Avenue in the Medium Density Residential Zone (MDRZ). They request moving the MDRZ boundary to the Richmond side of Otia Drive and zoning St James Avenue Reserve as Recreation. Concerns include loss of privacy, sunlight, and suburban character; increased traffic; and impact on community spaces. They advocate for a 7.5m height limit, 2.5m setbacks, and preserving existing zoning to protect amenity and character.

			I support well-planned residential growth where it is appropriately located and where the effects on existing communities are properly managed. However, the inclusion of St James Avenue within the proposed Medium Density Residential Zone is unnecessary and inappropriate. It would significantly reduce the amenity values enjoyed by existing residents, does not align with existing St James Avenue covenants, would alter the established suburban character of the street, potential loss of St James Avenue Reserve, Playground and Library and result in avoidable adverse effects on neighbouring properties. The requested amendments would provide a more balanced planning outcome by allowing growth in suitable locations while protecting the privacy, amenity, and character of St James Avenue.	Planning for growth should occur in locations that are better able to accommodate increased density, such as areas immediately surrounding town centres, transport corridors, main thoroughfares and locations where supporting infrastructure and services already exist. The inclusion of St James Avenue is not justified by these planning principles. St James Avenue falls outside the planning guideline that development should be within a 10-minute walk of the Richmond town centre. In practice, the walk from St James Avenue to Richmond town centre is approximately 20–25 minutes, which is around double the intended walking catchment. As a result, this location does not meet the stated objective of being within convenient walking distance of the town centre. Planning assumptions based on a 10-minute walk are therefore not applicable to St James Avenue. I also note that the proposed Medium Density Residential Zone Plan includes the St James Avenue Reserve. This reserve is a highly valued and well-used community asset that plays an important role in our neighbourhood. It is a popular gathering place for local families, with its playground providing a safe and accessible space for children to play. The loss of this reserve would be deeply felt by many residents. The Reserve is also home to our small community Book Exchange library, a much-loved resource that is regularly used by people from both the local neighbourhood and surrounding areas. These community amenities contribute significantly to the character, wellbeing, and connectedness of our neighbourhood. Their inclusion within the proposed Medium Density Residential Zone further supports the removal of St James Avenue from the Medium Density Residential Zone. Rezoning this area for higher-density development could have significant and lasting impacts on these valued community spaces and the people who rely on them, fundamentally altering the character and amenity of our local community. **2. Significant loss of residential amenity** One of the key purposes of district planning is to enable development while avoiding, remedying, or mitigating adverse effects on neighbouring properties. The proposed zoning would allow substantially larger buildings and increased site coverage, resulting in: • loss of privacy through overlooking from upper-storey windows and balconies; • increased visual dominance from larger building bulk;	

				• reduced sunlight and increased overshadowing of neighbouring properties; • loss of outlook and open space; • increased noise associated with higher residential intensity; and • reduced enjoyment of private outdoor living areas. • loss of the St James Ave Community Reserve, playground and community Book Exchange Library. These effects would significantly diminish the residential amenity currently enjoyed by residents of St James Avenue. **3. Inadequate protection of privacy** The current proposal does not provide sufficient protection for neighbouring properties from overlooking. Second and third storey windows, decks and balconies can create direct views into adjoining homes, bedrooms, living areas and private gardens. Once privacy is lost it cannot easily be restored. The District Plan should require effective privacy screening and appropriate setbacks to ensure neighbouring residents retain reasonable privacy and enjoyment of their properties. **4. Building height and bulk are excessive** Permitting buildings significantly taller than the existing housing stock will result in development that is visually dominant and out of scale with the surrounding environment. Large multi-unit developments can create a "wall effect" that reduces openness, blocks sunlight and adversely affects neighbouring properties. A maximum building height of **7.5 metres** would better reflect the existing scale of development within St James Avenue, as in the existing St James Avenue covenant, while still allowing reasonable redevelopment opportunities. **5. Insufficient boundary setbacks** The proposed development standards do not provide adequate separation between new medium-density housing and existing homes. Reduced setbacks increase the perception of dominance, reduce landscaping opportunities, and exacerbate privacy and shading effects.	

				A minimum setback of **2.5 metres from all side and rear boundaries** would create a more appropriate transition between developments, retain space for planting and reduce adverse effects on adjoining properties. **6. Traffic, parking and infrastructure pressures** Medium-density development will inevitably increase vehicle movements, on-street parking demand and pressure on existing infrastructure. St James Avenue is a relatively quiet residential street and was not designed to accommodate substantially higher traffic volumes associated with intensified residential development. The cumulative effects of increased traffic, reduced on-street parking availability and additional service demands have not been adequately addressed. **7. Poor planning outcome** Good urban planning requires growth to occur in locations where adverse effects can be effectively managed while maintaining the qualities that make existing neighbourhoods desirable places to live. The inclusion of St James Avenue within the Medium Density Residential Zone fails to achieve this balance. The proposal places disproportionate costs on existing residents through loss of privacy and sunlight, reduced amenity, increased dominance and changes to neighbourhood character, while providing limited planning justification for selecting this particular street. The notified proposal therefore does not represent the most appropriate planning outcome.	

Alex Johnston

Submitter 225

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS225.1	Proposed Plan Change No. 81 > Maps > Area Maps > 24 - Proposed PC81 - Area - Richmond, Main Road Hope	Amend	The relief we seek is that the maps be amended to delete this section of indicative road enabling the TDC 45m drainage channel to be established, thus reflecting the layout of the scheme plan sent to us by Rob O'Grady.	Oppose the retention of the section of indicative road between Hallmark Drive and the indicative Collins Road extension as per below.	The submitter requests amending the maps to remove the indicative road section, allowing the TDC 45m drainage channel as per Rob O'Grady's

			Rob Ogrady's scheme plan have formed the base for negotiations of the drainage lchanel land acquisition, valuations purposes and numerous meetings held with council staff, such as Chris Milne. We have attached and enclosed email correspondence from Nicky Mitchell dated 1/3/2023 suggesting the deletion of hallmark drive extension and the widening of the stormwater drainage channel. The trust replied to this email 1/6/23 in support of the councils changes.	Support the retention of the indicative walkway along the same alignment. The relief we seek is that this be retained on the planning maps.	scheme plan. This plan underpins negotiations and valuations with the council. They oppose the road extension between Hallmark Drive and Collins Road but support retaining the indicative walkway along this route. They seek these changes be reflected on the planning maps.

Daryl Johnston

Submitter 226

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS226.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Amend	4. Decisions Sought from the Tasman District Council: I request the Council make the following amendments to Plan Change 81: **Shift the MDRZ Boundary Line:** Move the active boundary line further north east toward the main thoroughfare, Otia Drive (park and graveyard side) being a natural demarcation, ensuring that the entirety of the quieter suburban pocket of Aratia Way and adjacent properties remain under standard Residential zoning. 5. Confirmation from the Tasman District Council: That the existing covenants on Aratia Way are enforced with any new development on the street. 6. Confirmation from the Tasman District Council: That the St James Avenue Reserve keeps its Recreation Reserve status and remains as a park for the local community. Extract from Draft Richmond Ward Reserve Management Plan May 2025. *"St James Avenue Reserve meets and exceeds the*	1. Specific Provision of the Plan Change this submission relates to: The spatial boundary lines mapping the **Medium Density Residential Zone (MDRZ)** on Aratia Way, Richmond, and the lack of a staggered transitional zone or enhanced privacy controls at the point where the zone changes partway down the street. Reference Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd. 2. The Submitter's Position is: **Oppose in Part.** I oppose the arbitrary application of the MDRZ boundary line partway down Aratia Way. While I understand the intent of the National Policy Statement on Urban Development (NPS-UD) to clear housing bottlenecks the reasons for location of the demarcation between zones are not clearly articulated nor does it meet council design guidelines or the existing covenants on the properties in this street. Introducing an abrupt 11-metre (three-storey) building allowance immediately adjacent to or across from lower-density standard residential sections creates an extreme imbalance. This directly threatens the existing neighbourhood character, traffic safety and the baseline amenity values (specifically privacy and daylight access) of the lower-density sections on the street, including 10 Aratia Way.	The submitter opposes part of Plan Change 81, seeking to move the MDRZ boundary northeast to keep Aratia Way and nearby homes under standard residential zoning. They request enforcement of existing covenants and retention of St James Avenue Reserve as Recreation Reserve. Concerns include loss of privacy, sunlight, and neighbourhood character, plus traffic and parking issues. The submitter calls for transitional zoning, adherence to design guidelines, and clear development management.

			expectations as a well-functioning all around neighbourhood reserve with great passive surveillance." The new MDRZ map shows the park as being part of this zone rather than being identified as a Recreation zone. The Open Space Assessment Richmond Ward does state that the existing reserve will be classified as a Recreation reserve. Map:80-51 should reflect that. 7. Advice from the Tasman District Council: How any developments would be managed to comply with the guidelines referenced above (B2 and F2) to prevent a random mix of housing types.	3. Reasons for Opposition: • **Severe Amenity Inequity:** An abrupt boundary change allows a 3-storey multi-unit development to be built adjacent to single-storey family homes. This creates a severe loss of privacy (overlooking into private backyards), loss of sun and substantial winter shading that the standard daylight recession planes do not adequately prevent on a street of this orientation. Further this results in a loss of passive winter heating hence adding costs for additional heating. • **Potential Effect on Property Values:** Future property buyers may be put off or expect to pay less for an existing home potentially or actually dominated by an adjacent 3 story building. This is a developers gain at a cost to the existing residents which is inequitable. • **Demarcation partway down Aratia Way:** No specific reason given for this. With reference to the TDC Urban Design Guide **Compatibility (Guideline B2):** States "Create a coherent streetscape in areas of mixed dwelling forms and size…" Breaking into groups the sections of streets that are of one type or another so there is not a random mix. I have not seen anything that would promote or require this. Single site development is completely at odds with this. **Frontages (Guideline F2):** "Encourage overall neighbourhood character, cohesion, quality and attractiveness….". This is currently the situation in Aratia Way, adding up to 3 story buildings would completely alter the streetscape and would ruin the character of the neighbourhood. **Neighbourhood Centre Provision (Guideline A2):** Says that a centre should be withing a 10 minute walk. Aratia Way is by any of the walking routes more like 20 – 25 minutes, so would be considered outside a MDRZ. The following extract from Appendix 15.1 Para 11 uses the phrase "walkable catchments of centres". **Existing Covenant:** As part of the original development of Aratia Way an easement is attached to each title. This restricts the type of development for each property (to	

				ensure Guidelines B2 and F2 are met). These include (not all listed) :- **Erect or permit to be erected upon any of the allotments:** (i) One dwelling per property (v) Any dwelling with less than a double garage of 36m2. (xviii) Any structure including dwellings, buildings, masts and aerials exceeding a height of 7.5 metres above the mean ground level of the land The covenant is one of the key reasons for buying and owning a property in this street as it provided certainty over the character and amenity of the street. • **Lack of Transitional Buffer:** Good urban design mandates a "step-down" or transitional buffer zone (e.g., restricting properties immediately bordering the boundary to a maximum of 8 metres or duplex-only configurations) rather than an immediate drop from 11 metres to standard low-density rules. • **Infrastructure and Traffic Constraints:** The narrow layout of Aratia Way cannot handle the localized traffic congestion and on-street parking overflow that occurs when multi-unit developments have insufficient on-site parking. Currently the majority of parking is off road, allowing good traffic movement especially for utility vehicles (rubbish, street sweeper etc) and the like. If parking were to occur on both sides of the street it effectively reduces it to a single lane **References** TDC Urban Design Guide 15 December 2018 TDC Update Map:80-51 19 June 2026 Annexure schedule for St James Ave Properties 28 November 1999 TDC TRMP Appendix 10 - Open Space Assessment Richmond Ward	

				Draft Richmond Ward Reserve Management Plan May 2025	

Terry Rosser

Submitter 227

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS227.1	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Oppose	The indicative road between Katania Heights and Jeffries Rd be removed from Plan change 81.	- It does not solve the NZTA concerns regarding sight lines at the SH6/Robertson Rd intersection or the increased safety concerns additional traffic would bring. Further development on Higgins Rd will also exacerbate this situation. - The indicative road is a less direct route to SH6 from Katania Heights than the existing road and is unlikely to be the preferred option. A reduction in vehicle movements through the Katania Heights cul-de-sac is likely to be minimal. - The road has no benefit to residents of Jeffries Rd and would increase traffic and noise in a rural area. - Indicative staging for the development of Jeffries Rd was stated as long term (2035 – 2054) in the FDS implementation plan 2025. This plan assumes a high growth model however, the Strategy, Finance and Performance Committee confirmed a population growth assumption for the LTP of medium in March this year, meaning this timeframe is likely to be pushed out. Given this, the indicative road would have a detrimental effect on the rural landscape and its current residents.	Submitters oppose the indicative road between Katania Heights and Jeffries Rd in Plan Change 81. They argue it won't improve safety at SH6/Robertson Rd and may worsen traffic issues. The road is less direct and unlikely to reduce cul-de-sac traffic. It offers no benefits to Jeffries Rd residents but would increase noise and traffic in a rural area. Long-term development plans suggest the road's timing is unrealistic, risking harm to the rural landscape.

Lauren Maser

Submitter 228

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS228.1	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.2 Transport (Access, Parking and Traffic)	Oppose	Either reduce intensification planned or provide for off-street parking for new developments. The existing streets are narrow and unable to be widened to provide for additional parking.	The proposed rules are insufficient to offset the total loss of off-street vehicle parking. My street, D'Arcy Street and the surrounding streets, are already congested with cars parked on both sides of the street for most of the day resulting in only one lane of passable traffic. The existing streets have no capacity to provide parking for additional dwellings occurring in intensification.	The submitter opposes the intensification proposal. They seek reduced intensification or off-street parking for new developments.

					Current streets like D'Arcy Street are narrow and congested, with cars parked both sides. There is no capacity for extra parking from increased dwellings. The proposed rules do not adequately address the loss of off-street parking.
OS228.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > 16.3.3A Medium Density Residential Zone	Oppose	a) Reduce the maximum permitted building height within the standard Richmond MDRZ from 11 metres to 8 metres (maximum 2 storeys). b) Reduce the maximum permitted building height within the Richmond Intensive Development Precinct from 14 metres to 11 metres (maximum 3 storeys). c) Insert a new requirement mandating that any proposed building exceeding 8 metres in height must trigger a Controlled or Restricted Discretionary Resource Consent process, ensuring affected immediate neighbors are formally notified and granted a right of reply. d) Amend the MDRZ coverage standards to reduce the maximum permitted Building Coverage from 60% down to 45%. e) Reduce the total maximum permitted Site Coverage from 70% down to 55%, ensuring a minimum of 45% of any medium-density site remains dedicated to natural, permeable green space. f) Introduce a mandatory "Permeable Surface Strategy" rule into the Plan Change 81 assessment criteria, requiring all developments over 40% site coverage to install engineered, on-site stormwater retention and continuous ground-water recharge systems.	I OPPOSE the proposed Height Limits framework outlined in Plan Change 81, specifically the standard 11-metre maximum building height rule for the general MDRZ and the 14-metre maximum building height rule applied within the Richmond Intensive Development Precinct. The reasons for my opposition are: a) Allowing 11-metre (3-storey) and 14-metre (4-storey) built forms as a permitted activity format will cause severe, irreversible loss of residential amenity, extreme morning/afternoon daylight shadowing, and a significant invasion of privacy due to the overlooking of existing low-density properties in Richmond. b) The Richmond urban landscape and its existing street-to-dwelling proportions cannot absorb 3-to-4 storey developments seamlessly without creating oppressive visual dominance. This is exacerbated by the relaxed recession plane and setback rules under the draft Design Matrix framework. I OPPOSE the proposed Building and Site Coverage standards introduced under Plan Change 81, which set a maximum Building Coverage limit of 60% and a total maximum Site Coverage limit of 70% for the Medium Density Residential Zone. The reasons for my opposition are: a) Allowing up to 60% of a net site area to be covered in buildings, combined with a 70% total site coverage limit, leaves an unacceptably low 30% margin for unbuilt, permeable soil. This will cause a significant increase in non-permeable surface areas across Richmond suburbs. b) Central Richmond has documented stormwater network pressures. Increasing impervious surfaces to 70% will vastly accelerate rapid surface water runoff during heavy rain events, increasing severe local flooding and overloading downstream council infrastructure. c) Leaving only 30% of a site uncovered prevents the planting of deep-root vegetation, canopy trees, and essential private green spaces. This layout eliminates local biodiversity and drives an urban heat island effect that degrades the liveability of Richmond.	Submitter opposes Plan Change 81's height and coverage limits in Richmond MDRZ. They seek reduced building heights: 8m (2 storeys) in MDRZ, 11m (3 storeys) in Intensive Precinct. They want stricter consent for buildings over 8m with neighbor notification. They propose lower building (45%) and site coverage (55%) limits, plus a permeable surface rule. Concerns: loss of amenity, privacy, visual dominance, stormwater issues, reduced green space, and urban heat effects.

Bruce Gilkison

Submitter 229

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS229.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth	Amend	Amend Policy 6.2.3.4 to recognise the value of natural floodplains and nature-based solutions when managing urban growth and climate risks.	Natural floodplains and wetlands provide important environmental benefits beyond reducing risks to development. Their restoration and protection can help mitigate flooding, erosion, and storm damage while increasing climate resilience over the long term.	The submitter seeks to amend Policy 6.2.3.4 to acknowledge the value of natural floodplains and nature-based solutions. They emphasize these areas provide vital environmental benefits beyond flood risk reduction. Protecting and restoring floodplains and wetlands can help mitigate flooding, erosion, and storm damage. This approach supports long-term climate resilience.
OS229.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Amend	Amend Policy 6.3.3.5A to place greater emphasis on active and micromobility transport connections between rural and urban centres through strategic planning and transport corridors.	Early planning of walking, cycling and micromobility networks is essential to support population growth, reduce transport emissions, and meet future travel demand. Safe and connected networks will encourage greater uptake of low-emission transport options.	The submission requests amending Policy 6.3.3.5A. It seeks to emphasize active and micromobility transport links between rural and urban areas. The reason is to support growth, reduce emissions, and meet travel needs. Early planning of walking, cycling, and micromobility networks is vital. Safe, connected routes will encourage low-emission transport use.
OS229.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Amend Policy 6.15.3.8 to strengthen recognition of walking and cycling connections between Māpua/Ruby Bay and surrounding centres such as Richmond and Motueka.	Residents regularly travel to larger centres for employment, education, health services, shopping and recreation. Safe and convenient active transport routes would deliver health, environmental, economic and congestion-reduction benefits.	**Submission Summary:** The submitter seeks to amend Policy 6.15.3.8 to better support walking and cycling links between Māpua/Ruby Bay and nearby centres like Richmond and Motueka. They highlight that residents frequently travel to these centres for work, education, health, shopping, and recreation. Improving active transport routes is seen as beneficial for health, environment, economy, and reducing congestion.

OS229.4	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.2 Objective	Amend	Amend Objective 11.1.2 to explicitly support safe, convenient and integrated cycling, walking and micromobility access between settlements and urban centres.	Improved active transport connections will reduce emissions, fuel costs, congestion and infrastructure demands while supporting healthier and more resilient communities.	**Summary of submission:** The submitter requests amending Objective 11.1.2 to explicitly promote safe, convenient, and integrated cycling, walking, and micromobility access between settlements and urban centres. They argue this will reduce emissions, lower fuel costs, ease congestion, and decrease infrastructure demands. Additionally, it supports healthier and more resilient communities through improved active transport connections.
OS229.5	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects > 11.1.2 Objective	Amend	Amend Policy 11.1.3.13 to require the provision of safe and convenient cycling and micromobility routes between centres, including routes connecting Māpua and Richmond.	Population growth, climate change commitments, and increasing use of electric bicycles will significantly increase demand for active transport. Safe, direct routes are needed to support low-emission travel and reduce dependence on private vehicles.	**Submission summary:** The submitter requests amending Policy 11.1.3.13 to require safe, convenient cycling and micromobility routes between centres, specifically linking Māpua and Richmond. They cite population growth, climate change goals, and rising e-bike use as reasons. The aim is to support low-emission travel and reduce reliance on private vehicles.
OS229.6	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Amend Policy 6.15.3.19 to ensure residential development is supported by adequate transport infrastructure, including active transport solutions as mitigation measures where network capacity is constrained.	Future population growth will place increasing pressure on transport infrastructure. Investment in cycleways and active transport networks can reduce traffic volumes, lower infrastructure costs, reduce emissions, and improve community resilience.	**Summary of Submission:** The submitter seeks to amend Policy 6.15.3.19 to require residential development to be supported by adequate transport infrastructure. They emphasize including active transport solutions as mitigation where network capacity is limited. The reason is that future population growth will strain transport systems. Investing in cycleways and active transport can reduce traffic, lower costs, cut emissions, and boost community resilience.

Dean McNamara

Submitter 230

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS230.1	Proposed Plan Change No. 81 > Maps > Area Maps > 27 - Proposed PC81 - Area - Wakefield Central	Amend	The logical designation for good town planning would be to designate this strip as commercial. Thus, keeping the centre of Wakefield as the town centre and providing commercial premises with State Highway frontage. Keep the housing away from the State Highway instead of trying to legislate ways to make it viable to live a healthy life in an unhealthy environment.	I do not support the medium-density zoning on buildings adjacent to Whitby Way and Whitby Road from Whitby Way to Arrow Street. You are proposing to substantially grow the population of Wakefield, and it makes no sense to put medium-density housing alongside the Highway where it will have to be noise-insulated. This is also the only logical expansion zone for commercial property to service the ever-increasing population of Wakefield. It is within walking distance of the village green car park, and all the other commercial buildings in Wakefield. To designate this area as housing will eventually divide the village, as new commercial enterprise will have to locate out of the town centre. This will be the same mistake repeated as with Richmond and Richmond West. Two separate town centres on either side of a State Highway. Once these sections have been redeveloped with medium density housing it will be 80 years before it is likely to be viable for commercial development again. By then Wakefield will be a fractured mess. Unless you are proposing that the residents of Wakefield should continue to commute to Richmond for all their shopping requirements, creating more congestion and planet destorying emissions in the process?	**Submission Summary:** The submitter opposes medium-density housing near Whitby Way and Arrow Street along the State Highway. They seek the area to be designated commercial to support Wakefield's growing population and keep the town centre intact. They argue housing there would cause noise issues, divide the village, and push commercial growth away from the centre, repeating past mistakes like Richmond West. They emphasize the importance of local commercial services to reduce commuting and emissions.

Judith Ashley

Submitter 231

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS231.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)	Oppose	Please cap building heights next to existing, established homes to 8 metres/two storeys.	I oppose the building of homes at 14 metres within existing subdivisions for the following reasons: I understand that there are considerations in place to protect sunlight, privacy, outlook, dominance of larger buildings and set back from boundary fences. In the case of my own property the building of a three story home next to my single story home would result in a loss of all of the above even if those rules were followed.	**Summary of submission:** The submitter opposes building heights of 14 metres next to established homes. They seek a cap at 8 metres/two storeys to protect sunlight, privacy, outlook, and reduce dominance. Concerns include loss of sunlight, overlooking, noise, and negative impact on property value. They note recent intensification has reduced living quality nearby.

				Such a building would overlook our bedroom, our main living area and our garden where we spend a considerable amount of time all year round. In winter we do not need to use any heating during the day as our home is kept warm by the high sunshine hours we enjoy here in Nelson in winter. We would be concerned that building a three storey home next to our home would affect its resale value. If the building was an apartment style building it would also bring an increase in noise outside our bedroom window. Our home has always been considered desirable because it is within walking distance of Richmond Town Centre particularly for retirees but now it feels like a negative if this proposal goes ahead. There has been recent intensification of buildings in Queen St between the roundabout and Washbourn Drive. I believe those developments have resulted in a loss of quality living for surrounding neighbours. A good example of intensification are the single story homes built in Talbot St - three single storey homes on one section. I think the building heights within the Central Richmond Intensive Precinct should be capped at 8metres/two storeys.	They prefer development similar to single-storey homes on Talbot St.

Julie Bytheway

Submitter 232

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS232.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Amend	Consider creating another entry/exit point for residents in Galeo Estate, Redvale Road, and La Mer View to Stringer Road and/or the Moutere Highway. Consider a pedestrian/cycle path between the current end of Redmill Road and the proposed extension of Redmill Road to Stringer Road, similar to the existing path from Redmill Road to Mount Arthur View.	Kia ora, Rob Sloot and I, Julie Bytheway, have lived at the end of the cul-de-sac at 45 Redmill Road since December 2018. We agree that further housing in the Tasman area is positive. Also, we support creating an alternative route out of the Galeo Estate, which currently has only one entry and exit on Maisey Road near SH60.	Submitters support more housing but want an additional entry/exit for Galeo Estate, Redvale Road, and La Mer View to Stringer Road or Moutere Highway. They raise safety concerns at the current Maisey Road/SH60 intersection, especially with low sun visibility and past fire risks.

				In the past, some Galeo residents have submitted concerns to the TDC about road safety at the intersection of Maisey Road and SH60. When the sun is low in the west, visibility at the intersection of Maisey Road and SH60 is dangerous. From the intersection of Maisey Road and SH60, turning east when the sun is low is dangerous, and it is safer to turn west, then turn into Stringer Road, then immediately come out of Stringer Road and turn east onto SH60 safely in the shade of the hill. During the forest fires in the summer of 2018-19, having only one entry and exit point in and out of Galeo seemed risky. Also, during adverse weather, natural disasters, and other high-risk events, an additional entry and exit point would be helpful for the residents of Galeo Estate, Redvale Road, and La Mer View. A connecting road from the Galeo Estate, Redvale Road, or La Mer View to Stringer Road or the Moutere Highway would be helpful. There is a pedestrian/cycle underpass on SH60 that connects Stringer Road and Westdale Road. It would be ideal for Galeo residents to have pedestrian and cycle access to this underpass. Hopefully, in the future, public transport can be expanded, and a bus stop could be installed on the Westdale Road side for buses travelling west and on the Stringer Road side for buses travelling east. Residents of Stringer Road, Galeo Estate, and Westdale Road currently have to drive to the nearest bus stop in Māpua, which is a barrier to using public transport. A pedestrian/cycle path between the current end of Redmill Road and the proposed extension of Redmill Road to Stringer Road, similar to the existing path from Redmill Road to Mount Arthur View, could also be helpful. Consider creating another entry/exit point for residents in Galeo Estate, Redvale Road, and La Mer View to Stringer Road and/or the Moutere Highway. Ngā mihi, Julie Bytheway & Rob Sloot	They suggest a pedestrian/cycle path linking Redmill Road to Stringer Road and improved public transport access with new bus stops for better connectivity.

David Briggs

Submitter 233

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS233.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Amend	Lower speed levels of SH6 between Factory Road and Broughton Road to 60 km/hr as part of (or before) this development.	The two road junctions between Brightwater and SH6, and that joining Robertson Road with SH6 are already dangerous junctions because of the high speed of vehicles on SH6, the limited visibility onto SH6 (especially in conditions of low sun) and the increasing volumes of traffic (including large trucks) that use these junctions. Significant increases	**Submission Summary:** The submitter requests lowering the speed limit on SH6 between Factory

				of residents on Katania Heights (and in Brightwater will) make then even more dangerous. It is therefore essential that traffic speed along Sh6 between Factory Road (on the north) and Broughton Road (to the south) be reduced to 60 km/hour. Failing this, a serious accident at one or more of these junctions is almost inevitable. This should be a required paet of this development.	Road and Broughton Road to 60 km/h. They highlight that existing junctions are dangerous due to high speeds, limited visibility, and increased traffic, including trucks. With more residents coming to Katania Heights and Brightwater, risks will grow. Reducing speed is essential to prevent serious accidents and should be part of the development conditions.

S Friend

Submitter 234

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS234.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 61 - Proposed PC81 - Zone - Wakefield Central	Oppose	No ,to medium density in the heart of wakefield village	I feel it deflects from the quite rural atmosphere of this village and this would alter this immensely by creating this in the heart of the orignal village , i feel a solution would be to allow this medium density in the outer new subdivisions not the inner original village, it will change the whole dynamic of this town.	

Andy Brannen

Submitter 235

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS235.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Heights are too high - at 11m that will have significant impact on neighbours. Maybe 2 stories at most	Heights are too high - at 11m that will have significant impact on neighbours. Maybe 2 stories at most	**Summary of Submission:** The submitter opposes the proposal due to building heights. They believe 11m is too high and will significantly impact neighbors. They suggest limiting heights to two stories at most.

Jeff Santa Barbara

Submitter 236

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS236.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	Please include this section.	I'm pleased that Local Government is recognizing the unique challenges faced by Māori, and this bespoke planning solution seems like a good first step.	**Submitter's Position:** Support **Decision Sought:** Please include this section. **Reason for Decision Sought:** The submitter appreciates that Local Government acknowledges the unique challenges faced by Māori. They view the bespoke planning solution as a positive initial step.
OS236.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 41 - Proposed PC81 - Zone - Motueka, McBrydie Rd	Amend	Please proceed with this proposed zone change to Rural Residential. Please retain some flexibility regarding the following: - Minimum lot sizes - Alignment and route of indicative roads and footpaths - Wetland requirements	While we overall support this zoning change, there are some details in the current plan change proposal that are concerning. - The indicative road set out in Area 17d (linking McBrydie Rd with the Motueka Valley Highway) is over very steep terrain. There is a risk this road could interfere with the desired Rural Residential character proposed by the zone change. There are better options for an east-west linking road between the Motueka and Moutere valleys. Eg. the proposed footpath along Hursthouse Rd would be a more suitable linking road. - The controlled minimum lot size of 4ha is unnecessarily restrictive. Nearby development has demonstrated that smaller lot sizes can meet the desired planning outcomes and still leave space to preserve rural amenities. - We support the addition of walkways and pedestrian/cycling connectivity between neighbourhoods. - We would also like to see a provision for the development of a dedicated cycleway servicing the Motueka Valley and linking into Motueka town.	Submitters support the proposed Rural Residential zoning but seek flexibility on minimum lot sizes, road and footpath routes, and wetland rules. They find the current road in Area 17d too steep and suggest alternative routes like Hursthouse Rd. They consider the 4ha minimum lot size too large, citing nearby smaller successful lots. They support walkways and want a dedicated cycleway linking Motueka Valley to Motueka town.

Richmond Unlimited

Submitter 237

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS237.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.3 Mixed Business Zone Rules	Support	Retain the proposed Mixed Business Zone provisions substantially as notified, including provisions that enable additional business development capacity and opportunities in Richmond, while maintaining and strengthening the role and vitality of Richmond's established town centre.	Richmond Unlimited supports the proposed changes to the Mixed Business Zone provisions as part of Plan Change 81 and the additional opportunities they provide for business growth in Richmond. Richmond has experienced significant residential and commercial growth, particularly through Lower Queen Street and Richmond West. These areas are increasingly an important part of Richmond's wider business district and provide opportunities for new businesses, investment, employment and services for Richmond's growing population. Richmond Unlimited considers it important that the planning framework provides sufficient and appropriately located capacity for businesses to establish, grow and respond to the changing needs of the Richmond community. We also support an approach where growth in mixed business areas complements rather than diminishes the role of Richmond's established town centre. The continued vitality of the town centre, alongside well-planned growth in Richmond West and other commercial areas, will contribute to a stronger and more diverse Richmond economy.	**Support** for retaining the proposed Mixed Business Zone provisions as notified. Submitter seeks to allow more business growth opportunities in Richmond, especially in Lower Queen Street and Richmond West. They emphasize the need for enough capacity for business establishment and growth. Support growth that complements, not diminishes, Richmond's established town centre. Overall, they want a stronger, more diverse Richmond economy through balanced development.
OS237.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Support	Retain the proposed provisions substantially as notified, including provisions that support the continued role, vitality and development of Richmond's established town centre alongside the growth of other commercial areas within Richmond.	Richmond Unlimited supports the provisions of Plan Change 81 that maintain and strengthen Richmond's established town centre while enabling the wider Richmond economy to grow. Richmond's commercial environment is changing as the town expands, with significant business and residential growth occurring beyond the traditional town centre. Richmond Unlimited considers this growth to be a positive opportunity for Richmond, but believes it is equally important that the established town centre continues to perform a strong role as a focus for retail, hospitality, professional services, civic activity and community life. A successful future for Richmond should not require a choice between growth in new commercial areas and the success of the existing town centre. These areas can perform complementary roles within a larger and more diverse Richmond economy. As Richmond's population and wider catchment continue to grow, there is an opportunity to strengthen the town centre through increased local spending, greater activity and demand for a wider range of businesses and services.	**Support for Plan Change 81** Richmond Unlimited wants to keep the proposed provisions mostly as notified. They support strengthening Richmond's established town centre while allowing new commercial growth. They see growth beyond the town centre as positive but stress the town centre's ongoing role in retail, hospitality, and community life. They believe both areas can complement each other to build a diverse, thriving Richmond economy.
OS237.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.8 Richmond	Support	Retain the proposed provisions for Richmond substantially as notified and retain the overall direction of Plan Change 81 that enables additional residential and business development capacity in Richmond. Richmond Unlimited seeks that future growth continues to support a strong and vibrant established town centre while	Richmond Unlimited supports the direction of Plan Change 81 for Richmond and the provision of additional capacity for residential and business growth.	**Richmond Unlimited supports Plan Change 81** as notified, seeking to retain its provisions.

			enabling complementary commercial growth across Lower Queen Street, Richmond West and other appropriate business areas.	Richmond is a growing urban and commercial centre, and its planning framework needs to evolve to provide sufficient capacity for that growth to continue in a planned and economically sustainable way. From a business perspective, residential and commercial growth are closely connected. A growing Richmond population increases the local customer base for existing businesses, supports demand for new retail, hospitality, professional and community services, and creates opportunities for greater local employment and investment. At the same time, providing sufficient land and development capacity for businesses is important to ensuring Richmond can accommodate new enterprises and enable existing businesses to grow. A planning framework that provides greater certainty around future development also gives businesses confidence to invest in Richmond. Richmond Unlimited considers that Richmond's established town centre, Lower Queen Street, Richmond West and other emerging commercial areas should be viewed as parts of a connected Richmond economy. These areas can perform complementary roles and collectively strengthen Richmond as a destination in which to live, work, visit and do business. Plan Change 81 provides an important opportunity to ensure Richmond's planning framework reflects the scale and role of Richmond today while providing for its continued growth into the future.	They want to enable more residential and business development in Richmond. They emphasize growth should support a strong town centre and complementary commercial areas like Lower Queen Street and Richmond West. They argue that residential and business growth are linked, boosting local economy, services, and employment. The plan provides certainty for investment and reflects Richmond's current and future role.

Nelson City Council

Submitter 238

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS238.1	Proposed Plan Change No. 81	Support	Retain the overall direction of the proposed changes, but amend the provisions to more clearly demonstrate how Policy 2 of the NPS-UD is given effect to.	12. Nelson and Tasman share a single urban environment recognised under the NPS-UD. 13. The Nelson/Tasman Future Development Strategy provides a coordinated approach to managing growth, housing and business capacity, infrastructure, and transport across the region. 14. The proposed changes generally support increased development capacity to accommodate future growth. 15. Greater clarity is needed to show how the proposal fully gives effect to Policy 2 of the NPS-UD and supports coordinated urban development outcomes across the shared Nelson/Tasman urban environment.	Submitters support the proposal but seek amendments for clarity. They want provisions to better show how Policy 2 of the NPS-UD is implemented. Nelson and Tasman share one urban environment under the NPS-UD. The Future Development Strategy coordinates growth, housing, business, infrastructure, and transport.

					Changes support increased development capacity but need clearer links to coordinated urban outcomes.

George Gibbs

Submitter 239

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS239.1	Proposed Plan Change No. 81 > Chapter 11: Land Transport Effects	Oppose	I ask that the proposal for a new road between Stringer Road and Redmill Road be deleted from the plan.	Plan Change 81 Urban Development - Area Map 12 I wish the plan for a connecting road to be amended as I am opposed to a road connection between Stringer Road and Redmill Road as shown on Area Map 12. However, I am most definitely in favour of a shared pathway between the two. Why am I opposed; We came to live in this area for the peace and quiet it provides us. There is mostly little traffic noise now, due to the fact that there is only one road into Galeo Estate. Allowing this road connection must inevitably result in an increase in traffic movements, in turn increasing noise and light intrusion along Redmill Road, past the end of Mt Arthur View, and down Redvale Road. Residents enjoy the quiet use of our local roads for walk and exercise. Some of our footpaths are patchy and of poor quality. The part of Redmill Road where it meets with close to the end of Mt Arthur View, the footpaths are incomplete and inadequate and dare I say, unsafe due to their poor construction and surface. It is easier and safer to walk on the roadside. There is no footpath connecting Galeo Rd and Maisey Rd either, so again pedestrians are forced to walk on the road. An increase in the amount of through traffic increases the risk for pedestrians in all of these areas. We also very much appreciate the dark sky area that we live in too where our building rules and covenants restrict upward and outward facing exterior lighting. This dark sky area includes almost complete lack of street lighting, so any increase in vehicle movements will also bring more unwelcome light disturbance to the area.	The submitter opposes the proposed new road between Stringer Road and Redmill Road, citing concerns about increased traffic, noise, light pollution, and pedestrian safety due to poor footpaths. They value the area's current peace, quiet, and dark sky conditions. Instead, they support creating a shared pathway for walking and cycling, providing a safer, quieter connection without the negative impacts of a new road.

				I support a shared pathway between Stringer Road and Redmill Road, as this will allow a safe connection for walking and cycling to the underpass at the junction of Stringer Road and the main highway.	

Dick Bennison

Submitter 240

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS240.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4A.1 Issue	Support	Retain	Essential that additional land for urban development is provided on land that does not have high actual potential for intensive horticultural production to meet a wide range of residential uses.	Submitters support the proposal. They seek to retain the decision as is. They believe it is essential to provide additional land for urban development. This land should not have high potential for intensive horticultural use. The aim is to meet diverse residential needs.
OS240.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities > 6.4.A 2 Objectives	Amend	Add the following to the end of the final sentence so that it reads: and promotes and incorporates density and urban design and amenity outcomes appropriate to a more intensive urban environment "along with standard density urban development"	Should also include standard density housing to be a fully functional urban environment that meets the needs of the entire community, not only those wanting compact high density living options.	The submitter requests an amendment to the decision. They seek to add that the proposal should promote and include density, urban design, and amenity outcomes suitable for both intensive and standard density urban environments. The reason is to ensure the area supports a fully functional community, catering to all residents, not just those preferring high-density living.
OS240.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 53 - Proposed PC81 - Zone - Richmond, Main Road Hope	Amend	Extend the Residential Zone to the South Eastern corner of Map 80-53 and beyond to include the areas of land to the South Eastern side of Paton Road, not shown on Map 80-53 and extending to Hill ST South. That would include the areas identified as part of stage 2 of the RSDA and shown on the TRMP Areas Map 57 bordered by an interrupted blue line. See full submission for more details.	A singular focus on infill development (brownfield), to provide primarily 1 and 2-bedroom compact homes in the centres of Richmond and other rural towns, with little or no provision for new (greenfield) Residential Zones that provide for general housing needs does not meet the requirements of General Objective 2A of the Tasman Regional Policy Statement. **PC81 makes no realistic provision for standard density residential development and fails to achieve General Objective 2A** "*Tasman contributes to a well-functioning Nelson Tasman urban environment*	The submitter seeks to extend the Residential Zone southeast of Map 80-53 to include stage 2 of the Richmond South Development Area (RSDA). They argue PC81 focuses too much on high-density infill housing and neglects wider housing needs, failing General Objective 2A of the Tasman Regional Policy Statement. They highlight limited land availability for standard density housing and support rezoning Rural 1 land to Residential to meet demand and align with infrastructure plans.

				that enables all people and communities to provide for their social, economic and cultural wellbeing and for their health and safety now and into the future"(p22 TRPS). **PC81 only meets the requirements of those residents who are willing to accept living in high density small capacity housing and not the wider needs of the community.** As of July 2026 the Residential Zoned land in Richmond West is now almost fully developed. The subdivision development is complete, and new housing development is close to 90% completed with ongoing house building continuing. Some infill development is being undertaken within central Richmond. The pace of that infill development is being restricted by the general lack of availability of suitable sites on the market and the reluctance of developers to accept the higher risks of costly high density residential developments in a market that is not accustomed to compact multi-level high density living. Of the 35ha rezoned Residential in the **Richmond South Development Area (**RSDA) approximately 14.9ha remains undeveloped, with development about to commence on parts of that remaining area. Furthermore, development has commenced on approximately 8ha of the Rural 1 portion of the original RSDA that has subsequently been rezoned Residential by private plan changes. **Clearly the ambition of the Richmond Growth Model 2024-54 providing the entire housing requirement for the Richmond population growth through to 2034 within Richmond West residential zone and infill development in Richmond central, will not be achieved.**	

				We submit that to provide: A wider range of residential development options than provided for in the proposed "Medium Density Residential Zone", that the extension of the "Richmond South Development Area" encompassing the second stage of that area, be included in PC81 with a change in zoning from Rural 1 to Residential. Although the entire servicing infrastructure for residential development in the RSDA is not yet completed, much of it is either underway or part of the current TDC Long Term Plan and will become available soon. **The area identified in the TRMP Areas Map 57 as the extended RSDAis predominately moderately sloping hilly land that does not meet the definitions of "*high productive land*". It would therefore meet the policy and objective requirements of both the TRPS and the TRMP in respect to "*high productive land*" as well as providing a wider range of residential development options than the Medium Density Residential Zone proposed in PC81.** **Including the second stage of the RSDA in PC81 would go some way towards satisfying the demand for standard density residential land beyond the existing Residential Zoned areas still undeveloped in the initial stage of the RSDA.**	

Te Runanga o Ngati Rarua

Submitter 241

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS241.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.2 Objectives	Support	Retain as notified	Currently, the operative provisions of the Tasman Resource Management Plan (TRMP) create barriers to the development and use of ancestral Māori land. these barriers include restrictive and complex regulatory provisions, and an absence of a clear and enabling policy framework for papakāinga development across the various zones. As a consequence, tangata whenua whānau, hapū and iwi have faced significant time, cost, and uncertainty in obtaining resource consent for papakāinga development. this limits their ability to provide housing that meets the social cultural, and economic needs of their communities. The papakāinga provisions address barriers that have historically limited tāngata whenua in developing and using their ancestral land by enabling papakāinga development in a manner that reflects tikanga Māori and supports the wellbeing of current and future generations. The papakāinga provisions recognise papakāinga as taonga and establish a clear policy framework that enables tāngata whenua to exercise rangatiratanga over ancestral land. they support development that strengths cultural connections while promoting social, cultural, environmental, and economic wellbeing. The provisions improve plan efficiency by providing clearer activity pathways, reducing reliance on discretionary resource consent processes, improving certainty for applicants, and reducing unnecessary consenting costs while maintaining appropriate environmental standards. In accordance with section 74(2A) of the RMA, Council must take into account recognised iwi planning documents when preparing or changing a district plan. The proposed papakāinga provisions give effect to a number of outcomes sought through Poipoia Te Ao Tūroa and are therefore supported. The papakāinga provisions also recognise and provide for Part 2 RMA matters, in particular the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga (section6(e)); the exercise of kaitiakitanga (section7(a)); and the principles of the Treaty of Waitangi (section 8). Refer to original submission for more information	Retain objectives as notified
OS241.2	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development > 10A.3 Policies	Support	Retain as notified	Currently, the operative provisions of the Tasman Resource Management Plan (TRMP) create barriers to the development and use of ancestral Māori land. these barriers include restrictive and complex regulatory provisions, and an absence of a clear and enabling policy framework for papakāinga development across the various zones. As a consequence, tangata whenua whānau, hapū and iwi have faced significant time, cost, and uncertainty in obtaining resource consent for papakāinga development. this limits their ability to provide housing that meets the social cultural, and economic needs of their communities. The papakāinga provisions address barriers that have historically limited tāngata whenua in	Support Chapter 10A Papakāinga policies, retain as notified.

				developing and using their ancestral land by enabling papakāinga development in a manner that reflects tikanga Māori and supports the wellbeing of current and future generations. The papakāinga provisions recognise papakāinga as taonga and establish a clear policy framework that enables tāngata whenua to exercise rangatiratanga over ancestral land. they support development that strengths cultural connections while promoting social, cultural, environmental, and economic wellbeing. The provisions improve plan efficiency by providing clearer activity pathways, reducing reliance on discretionary resource consent processes, improving certainty for applicants, and reducing unnecessary consenting costs while maintaining appropriate environmental standards. In accordance with section 74(2A) of the RMA, Council must take into account recognised iwi planning documents when preparing or changing a district plan. The proposed papakāinga provisions give effect to a number of outcomes sought through Poipoia Te Ao Tūroa and are therefore supported. The papakāinga provisions also recognise and provide for Part 2 RMA matters, in particular the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga (section6(e)); the exercise of kaitiakitanga (section7(a)); and the principles of the Treaty of Waitangi (section 8). Refer to original submission for more information	
OS241.3	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Amend	Renumber as standalone chapter	The location of the Papakāinga Development chapter at 10A infers that Papakāinga Development is a subset of Chapter 10: Significant Natural Values and Historic Heritage. However, the papakāinga provisions are a development framework quite separate to significant natural values and historic heritage, and therefore should sit alongside other standalone chapters. Independent numbering will make the plan easier to interpret and avoid confusion when citing provisions. Refer to original submission for more information	Renumber as standalone chapter
OS241.4	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.14 Papakainga development > 16.14.2 All Zones	Support	Retain 16.14.2.1, 16.14.2.2 and 16.14.2.3 as notified	Currently, the operative provisions of the Tasman Resource Management Plan (TRMP) create barriers to the development and use of ancestral Māori land. these barriers include restrictive and complex regulatory provisions, and an absence of a clear and enabling policy framework for papakāinga development across the various zones. As a consequence, tangata whenua whānau, hapū and iwi have faced significant time, cost, and uncertainty in obtaining resource consent for papakāinga development. this limits their ability to provide housing that meets the social cultural, and economic needs of their communities. The papakāinga provisions address barriers that have historically limited tāngata whenua in developing and using their ancestral land by enabling papakāinga development in a manner that reflects tikanga Māori and supports the wellbeing of current and future generations. The papakāinga provisions recognise papakāinga as taonga and establish a clear policy framework that enables tāngata	Retain 16.14.2.1, 16.14.2.2 and 16.14.2.3 as notified

				whenua to exercise rangatiratanga over ancestral land. they support development that strengths cultural connections while promoting social, cultural, environmental, and economic wellbeing. The provisions improve plan efficiency by providing clearer activity pathways, reducing reliance on discretionary resource consent processes, improving certainty for applicants, and reducing unnecessary consenting costs while maintaining appropriate environmental standards. In accordance with section 74(2A) of the RMA, Council must take into account recognised iwi planning documents when preparing or changing a district plan. The proposed papakāinga provisions give effect to a number of outcomes sought through Poipoia Te Ao Tūroa and are therefore supported. The papakāinga provisions also recognise and provide for Part 2 RMA matters, in particular the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga (section6(e)); the exercise of kaitiakitanga (section7(a)); and the principles of the Treaty of Waitangi (section 8). Refer to original submission for more information	
OS241.5	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.14 Papakainga development > Schedule > Schedule 16.14A: Papakainga development standards	Support	Retain as notified	Currently, the operative provisions of the Tasman Resource Management Plan (TRMP) create barriers to the development and use of ancestral Māori land. these barriers include restrictive and complex regulatory provisions, and an absence of a clear and enabling policy framework for papakāinga development across the various zones. As a consequence, tangata whenua whānau, hapū and iwi have faced significant time, cost, and uncertainty in obtaining resource consent for papakāinga development. this limits their ability to provide housing that meets the social cultural, and economic needs of their communities. The papakāinga provisions address barriers that have historically limited tāngata whenua in developing and using their ancestral land by enabling papakāinga development in a manner that reflects tikanga Māori and supports the wellbeing of current and future generations. The papakāinga provisions recognise papakāinga as taonga and establish a clear policy framework that enables tāngata whenua to exercise rangatiratanga over ancestral land. they support development that strengths cultural connections while promoting social, cultural, environmental, and economic wellbeing. The provisions improve plan efficiency by providing clearer activity pathways, reducing reliance on discretionary resource consent processes, improving certainty for applicants, and reducing unnecessary consenting costs while maintaining appropriate environmental standards. In accordance with section 74(2A) of the RMA, Council must take into account recognised iwi planning documents when preparing or changing a district plan. The proposed papakāinga	Support Schedule 16.14A, retain as notified

				provisions give effect to a number of outcomes sought through Poipoia Te Ao Tūroa and are therefore supported. The papakāinga provisions also recognise and provide for Part 2 RMA matters, in particular the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga (section6(e)); the exercise of kaitiakitanga (section7(a)); and the principles of the Treaty of Waitangi (section 8). Refer to original submission for more information	
OS241.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.13 Papakainga Zone Rules	Support	Retain 17.13.2.1 and 1.13.2.2A as notified.	Currently, the operative provisions of the Tasman Resource Management Plan (TRMP) create barriers to the development and use of ancestral Māori land. these barriers include restrictive and complex regulatory provisions, and an absence of a clear and enabling policy framework for papakāinga development across the various zones. As a consequence, tangata whenua whānau, hapū and iwi have faced significant time, cost, and uncertainty in obtaining resource consent for papakāinga development. this limits their ability to provide housing that meets the social cultural, and economic needs of their communities. The papakāinga provisions address barriers that have historically limited tāngata whenua in developing and using their ancestral land by enabling papakāinga development in a manner that reflects tikanga Māori and supports the wellbeing of current and future generations. The papakāinga provisions recognise papakāinga as taonga and establish a clear policy framework that enables tāngata whenua to exercise rangatiratanga over ancestral land. they support development that strengths cultural connections while promoting social, cultural, environmental, and economic wellbeing. The provisions improve plan efficiency by providing clearer activity pathways, reducing reliance on discretionary resource consent processes, improving certainty for applicants, and reducing unnecessary consenting costs while maintaining appropriate environmental standards. In accordance with section 74(2A) of the RMA, Council must take into account recognised iwi planning documents when preparing or changing a district plan. The proposed papakāinga provisions give effect to a number of outcomes sought through Poipoia Te Ao Tūroa and are therefore supported. The papakāinga provisions also recognise and provide for Part 2 RMA matters, in particular the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, wāhi tapu, and other taonga (section6(e)); the exercise of kaitiakitanga (section7(a)); and the principles of the Treaty of Waitangi (section 8).	Support. Retain 17.13.2.1 and 1.13.2.2A as notified.

				Refer to original submission for more information	
OS241.7	Proposed Plan Change No. 81 > Maps > Zone Maps > 57 - Proposed PC81 - Zone - Takaka, Pohara	Support	Support, retain as notified.	The rezoning of Onetahua Marae will support existing marae functions, enable future housing opportunities, reflect hau kāinga aspirations, and provide planning certainty.	Support, retain as notified.

Randolph WALLER

Submitter 242

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS242.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	In the intervening period there is nothing wrong with saying no to urban development or limiting development growth (this is said while acknowledging the total impact of Plan 81 will not happen at once). Deal with the infrastructure issues first to a position where growth is built in. Deal with the flood prevention issues instead of playing catch up after a severe event. Refer to original submission for more information	Plan 81 is about "putting the cart before the horse" Refer to original submission for more information	Several concerns with Plan Change 81 related to insufficient infrastructure including lack of parking, roading choke points including Lower Queen St/Gladstone Road and Gladstone Rd Three Brothers corner, flood protection issues as well as changing daylight angles. Refer to original submission for more information

LYNDON Brewerton

Submitter 243

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS243.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 51 - Proposed PC81 - Zone - Richmond, Gladstone Rd	Oppose	Oppose Medium Density Residential Zone at 150 Wensley Rd.	• Loss of privacy and amenity due to overlooking • Inconsistency with Neighbourhood Character • Property Value Impacts Refer to original submission for more information	Oppose Medium Density Residential Zone at 150 Wensley Rd, retain as lower density residential.

OS243.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	If MDRZ proceeds, apply additional rules for this interface: increased boundary setbacks, maximum 1 storey on boundaries adjoining existing low-density, privacy screens, landscaping buffers, and restricted building height to protect existing residents.	• Loss of privacy and amenity due to overlooking • inconsistency with Neighbourhood Character • Property Value Impacts Refer to original submission for more information	Amend MDRZ rules to reflect: increased boundary setbacks, maximum 1 storey on boundaries adjoining existing low-density, privacy screens, landscaping buffers, and restricted building height to protect existing residents

Gillian Stickland

Submitter 244

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS244.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Oppose	Not sure what this section is for. But its really difficult to object in general to this proposal, so I've just objected to the Enviromental effects.	The new housing plan for the region does not take into account the environmental impact in the area. Where are all these new people going to go to school, doctors, or hospital. The roads around the region are already at capacity, so where is all the increased traffic flow going to go? Do you have a guarantee from the government that all the increases on infrastructure will be made to accommodate the increase in demand. It's also worrying to see the amount of dwellings that are intended to be placed in a hectare.	The submitter opposes the proposal due to environmental concerns. They question the capacity of local infrastructure like schools, healthcare, and roads to support population growth. They seek assurance that government will upgrade infrastructure to meet increased demand. Concerns are raised about the high density of dwellings planned per hectare and the overall environmental impact.

Mary Macfarlane

Submitter 245

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS245.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building	Oppose	I oppose the proposed section 17.1A.3.2. Shearer Terrace	Shearer Terrace is a well-established, low-density residential neighbourhood characterised by excellent	**Summary of Submission:**

	Construction or Alteration > 17.1A.3.2 Restricted Discretionary Activities (Comprehensive Development)			sunlight access and open views to the mountains of Kahurangi, the Richmond hills and the sea. Allowing 14 m high multi-dwelling developments will introduce significant adverse effects: · Loss of daylight and sunlight – constructing up to14 metre structures adjacent to existing single or double-storey homes will severely obstruct living conditions and creates prolonged winter shading, decreases natural indoor warmth, and drives up household energy costs. · Current Solar power installations would be compromised with elevated structures alongside. · Loss of views and visual amenity – high density, multi-dwelling blocks will create dominant, imposing building mass. This destroys the established suburban open space, visually smothers neighbouring properties, and compromises privacy through direct overlooking. This will create neighbourhood character imbalances with future slums and crime escalation. · Severe traffic and parking congestion – even if we are close to the town centre, it is likely that many of these dwellings are going to have at least 1 or 2 cars each and will never have enough off-street parking to accommodate these. Shearer Terrace is already severely congested with parking creating blind spots for pulling out of driveways. It can already be difficult to drive down the street with cars parked on both sides when you meet a vehicle coming the other way. · The additional vehicle movements that these multi-dwelling developments will create will materially worsen existing traffic safety and access issues on Shearer Terrace including access by emergency services and refuse collection. It will also put pressure on local road networks in Richmond. · Increased noise and emissions detracting from quality of life. It would be reasonable to apply this proposal to all new greenfield developments in Richmond where the It is unreasonable to retrospectively impose this on existing residential areas where	The submitter opposes the proposed 14m high multi-dwelling developments on Shearer Terrace. Concerns include loss of sunlight, views, privacy, and increased shading leading to higher energy costs. They highlight traffic congestion, parking shortages, noise, and safety issues. The submitter argues the proposal is unsuitable for this low-density neighbourhood and lacks demonstrated practical effects. They compare Richmond unfavorably to Christchurch, noting infrastructure differences and community expectations.

				residents bought with a different expectation of neighbourhood scale and amenity and property value, which will reduce. · The Appendix 15.3 Intensification Study Drawings showing example developments do not include a single example of a 14m building. This absence suggests that the practical effects of a 14m building in the type of residential street have not been clearlydemonstrated. · I know Christchurch well and is easy to find examples! 14m high developments are allowed in central city. Christchurch has a population of over 400,000 vs Richmond's 20,000. This comparison highlights that a 14m building height is more typical of a central urban context than an established low-density suburban street such as Shearer Terrace as opposed to Christchurch being rebuilt post earthquake on a blank canvas including the rebuild of infrastructure to cater for intensive living – unlike the situation in Richmond. people buying into it knew what to expect and the infrastructure could be designed to handle the increased density with adequate pipes, parking, green space etc.	
OS245.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 45 - Proposed PC81 - Zone - Richmond Central Two	Oppose	Change proposal for Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise and Washbourne Drive from the Medium Density Residential Zone and the Richmond Intensive Development Precinct to Residential zone (as we are now).	I agree intensive development is required for the future in Richmond – BUT should be planned for in new subdivisions that allows infrastructure to be in place while building from the outset with people able to purchase a home without being surprised by changes as we have been. Refer to original submission for more information	**Summary of Submission:** The submitter opposes changing Shearer Terrace, Crescent Street, Blair Terrace, D'Urville Rise, and Washbourne Drive from Medium Density Residential and Richmond Intensive Development Precinct to Residential zone. They agree intensive development is needed in Richmond. However, they want it planned in new subdivisions with proper infrastructure from the start. They seek to avoid unexpected changes for current homeowners.

Jan Heijs, Expert witness capacity

Submitter 246

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS246.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Amend	Amend objectives, policies and explanatory text so that Water Sensitive Design is required rather than encouraged or applied only where practicable. Replace weak wording and align PC81 with the Land Development Manual and Urban Stormwater Strategy. My submission is that for any new developments, which is the scope of PC81, LID should be required and that the full LID process should be followed as included in the LDM (see full submission for full details). Compared to the text in the LDM, PC81 is very outdated and not consistent with the LDM. PC81 is the opportunity to fix that at least for the development areas proposed, Further delay will only cause more negative stormwater effects. It should be made clear in explanatory sections such as 'Principles and Reasons' that the use of the Low Impact Design process is required to protect our water environment and that traditional stormwater management has failed to achieve that. Low Impact Design (or better Water Sensitive Design) should be required to manage stormwater in all developments proposed under PC81. Removing words such as 'where practicable' and use words that make clear LID is required. Not using LID could be allowed as non-discretionary (not my preference) under very strong rules. I suggest replacing LID with WSD everywhere in the TRMP/PC81 if that can be achieved under the current plan change. If this is not possible, I suggest making the link between LID and WSD in the definitions.	The submitter considers current and proposed wording is too weak and has resulted in low uptake of Water Sensitive Design. The submission states that Water Sensitive Design should be a required part of the development process to protect water quality, stream health and stormwater outcomes. A few examples of weak wording, which has contributed to the low uptake of LID which was also observed in the LID review: •In Urban Infrastructure Service, Policies (6.3.3) "the use of Low Impact Design solutions for the management of stormwater run-off **where practicable**." This paragraph also includes some good policies related to stormwater and stream management. •In the Methods of Implementation (6.3.20.1): "Rules **that encourage** the use of Low Impact Design solutions in the management of stormwater " •In Principle Reasons and Explanation (6.3.30): "The use of Low Impact Design solutions **is encouraged** where the site and surrounding environment permit. Low Impact Design principles are concerned with minimising the adverse effects of development by protecting, incorporating, or mimicking natural drainage features to manage the flow and quality of stormwater run-off **where practicable**." •Mapua/Ruby Bay Issues (6.15.1.9): "Integrated management of stormwater using low impact design solutions, **where practicable**, and maintaining low-lying flood prone land for ponding, during major flood events". **It is also not clear why this is included as an issue**. •Māpua /Ruby Bay, Policies (6.15.3): "To minimise stormwater runoff through catchment-wide management and utilize low impact stormwater design, **where practicable**, that provides for stormwater as well as open space and recreational needs"	The submitter seeks stronger objectives, policies and explanatory text requiring Water Sensitive Design (Low Impact Design) for all development enabled by PC81. A few examples of weak wording, which has contributed to the low uptake of LID which was also observed in the LID review: •In Urban Infrastructure Service, Policies (6.3.3) "the use of Low Impact Design solutions for the management of stormwater run-off **where practicable**." This paragraph also includes some good policies related to stormwater and stream management. •In the Methods of Implementation (6.3.20.1): "Rules **that encourage** the use of Low Impact Design solutions in the management of stormwater " •In Principle Reasons and Explanation (6.3.30): "The use of Low Impact Design solutions **is encouraged** where the site and surrounding environment permit. Low Impact Design principles are concerned with minimising the adverse effects of development by protecting, incorporating, or mimicking natural drainage features to manage the flow and quality of stormwater run-off **where practicable**." •Mapua/Ruby Bay Issues (6.15.1.9): "Integrated management of stormwater using low impact design solutions, **where practicable**, and maintaining low-lying flood prone land for ponding, during major flood events". **It is also not clear why this is included as an issue**. •Māpua /Ruby Bay, Policies (6.15.3): "To minimise stormwater runoff through catchment-wide management and utilize low impact stormwater design, **where practicable**, that provides for stormwater as well as open space and recreational needs" •Māpua/Ruby Bay Principle Reasons and

				•Māpua/Ruby Bay Principle Reasons and Explanation: "…. While low impact stormwater systems are **encouraged**, they may not be appropriate on some areas such as hill or clay soil areas.". This statement is concerning because it demonstrates that the understanding of LID is inadequate. Chapter 3 in the TRMP includes guidelines for development. These included some components of a good Low Impact Design process but clearly ignored looking at development patterns across the region. Words such as 'where practicable' provide a way out, an easy pathway not to implement LID as experienced in the Tasman District under the current and proposed wording. LID is not a 'nice-to-have' but necessary to protect our water environment. There is no alignment with the Land Development Manual (LDM) where stronger wording is used but hard to enforce because of the lack of backing by the TRMP. This includes the use of Low Impact Design (LID). The LDM uses WSD which has the same meaning.	Explanation: "…. While low impact stormwater systems are **encouraged**, they may not be appropriate on some areas such as hill or clay soil areas.". This statement is concerning because it demonstrates that the understanding of LID is inadequate. Chapter 3 in the TRMP includes guidelines for development. These included some components of a good Low Impact Design process but clearly ignored looking at development patterns across the region.
OS246.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Amend	Amend PC81 to require catchment planning at a whole-catchment scale before development proceeds and to use the outcomes to identify and address stormwater effects and mitigation requirements. The Māpua/Ruby Bay catchment Management Plan should be presented in a similar format as for the Richmond and Motueka Catchment Plan using an interactive, map based digital planform sometimes called StoryMap. The Māpua/Ruby Bay Catchment Management Plan should also be consulted on separately similar to what was done for Richmond and Motueka to invite more stormwater specific feedback. The comments below should be taken as recommendations: Catchment Overview	The submitter considers catchment-wide assessments are necessary to understand cumulative stormwater effects, identify mitigation requirements and avoid leaving stormwater management to later consent stages. a. The need for comprehensive catchment planning is missing from the. b. PC81 mentioned the need to use a (whole) catchment-based approach only in the Principal Reasons and Explanation in s6.3.20 and in 7.2.3.10 but fails to explain what and how catchment planning should be undertaken. c. No policies and no rules give effect to this 'Principle Reason' d. Also, words like "a whole-catchment approach …. is encouraged" (s 7.2.30) makes catchment planning an option not what is required.	The submitter seeks a requirement for comprehensive catchment planning to support development areas proposed through PC81.

			• Catchments and intermittent and permanent streams are not shown (figure 0-1). Digital interactive access is needed. • The catchment description is taken from Wikipedia records. Surely more and better information is locally available. • Figure 0-2 is very small and not well accessible. Digital interactive access using a sliding map is needed. • Rainfall patterns are not supported by a map as is the case in the Richmond CMP. Rivers and Streams • Under Rivers and Streams (page 9), only the Seaton Valley stream is mentioned. The supporting maps are very small and not readable including its legend. • It is required to map all the catchments and all ephemeral and intermittent streams and have a way to zoom in/out using an interactive map! • Looking at objectives 1.2 in the Urban Stormwater Strategy requiring no stream loss, all streams have to be mapped (in the CMP) and so it is clear when new development proposals don't cause any stream loss! Land coverage • The maps (figure 0-4) related to Land Coverage are very small inaccessible and legends are not readable. Need an interactive map. Reference to key information in other documents stating a long URL is not helpful Key information / maps should be included in the CMP. • Reference to Plan Change 81 is unclear (top of page 10). Many readers will not know what this is. A short description with relevant information related to Māpua needs to be included. • Masterplan maps need to be supported by legends and be accessible using interactive maps (pages 10-12) Stormwater assets • Figure 0-8 showing the stormwater network is very small, has no legend and should be accessible using interactive map technology	e. Catchment planning, looking at pre-development and post development options and analyses changes in runoff quantity and quality will enable the identification of the impact on stream (and estuary) health and help identify mitigation options using the process as included in Table 3 f. The catchment plan for Māpua is not formally adopted by council, has not been used to identify the effects under pre and post development and does not meet the requirements to confirm the mitigation needed. g. Catchment plans for other areas under PC81 are absent, so no assessment can be made of the effects of the proposed developments and the necessary mitigation.	

			• The location of the Seawall is discussed but not shown on an (interactive) map. • I support the mapping, protection and enforcement of overland flow paths. How will this be achieved as it has been on the cards for many years already. • Figure 0-10 is hard to see because it is too small and not interactive. Stream Health • Have all (permanent and intermittent) streams been assessed? • The scope of health assessment appears much more limited compared to what was done for the Richmond CMP but hard to see because no detailed information is accessible. Stream modification and riparian margins and barriers to fish passage are not included. • The observation that all streams in Māpua have been modified highlights a significant issue and underscores the need for improved stream management practices. • Improvement actions should also include: 'no stream loss is required through zone changes' and 'riparian planting and access to streams to be achieved through. Water quality and contamination • I very much agree with the statement that "Compared to other regions in New Zealand, the adoption of stormwater treatment and water-sensitive designs in new subdivisions is low". This observation and the reasons for that are clearly explained in the report "Applying Low Impact (Water Sensitive) Design in Nelson Tasman" from 2016. After 9 years this still hasn't resulted in improved stormwater requirements in the TRMP. • An assessment of contamination risks for high-use roads and car parks, like the one done in Richmond, is missing. The roads in and out of Māpua, Aranui Road, and the carparks near Māpua Wharf likely fall into a medium or high-risk category and need stormwater treatment.		

			• The location of wastewater pumping stations and overflows should be mapped with an indication of the (modelled) overflow frequency • The observation in the aspirations and target table on page 19-20 stating that "Treatment from Residential development is excluded from the Nelson Tasman Land Development manual (NTLDM)" is factually incorrect. The stormwater chapter in the NTLDM states in section 5.4.8.2 "Stormwater treatment shall be provided within greenfield, infill and brownfield developments, including any redevelopment of roads and carparks that meet the treatment requirements in 5.4.8.2". • The NTLDM is however not enough to enforce the requirement for Water Sensitive Design (WSD) at the planning stage. The Resource Management Plan requirements are critical to enforce the need to implement ESD to give effect to the Urban Stormwater Strategy and complement the NTLDM requirements. Plan change text must be strong and leave no room for avoiding the desired outcomes. • Also, the MMP needs to require that Water Sensitive Design (WSD) will be required during every zone-change for all (re)developments. The text behind in the "Aspirations and Targets table" needs to be adjusted accordingly and targets and actions identified resulting from that. • The 10-year target in the Aspirations and Targets table under section 2.3 to retrofit council-owned car parks should also include high-use roads. Stormwater runoff from very high-use car parks in the area of the wharf, including parking along Aranui Rd, Iwa Street, and Tahi St, must be treated. If the boat ramp project proceeds, parking related to the boat ramp and the boat ramp itself should also undergo treatment. • With this target the council commits to making funds available to undertake these retrofits. I don't believe these funds are available in the current LTP, so council must include these in the next LTP. • To meet the 10-year target under aspiration 2.3, improvement action I.3 should be changed to "Install stormwater treatment devices at carparks within 10 years"		

			Flooding • I fail to see why in the MMP some flood maps are presented but in the CMP maps of flood plains and sea-inundation are not provided and only included as a future action. It is generally known that the flood plain assessments have been underway for years and it is very disappointing that this information is not included in the CMP. • This triggers the question whether TDC believes the current mapping is not reliable and should be repeated. • This type of information is critical to understand risks to life and property in existing and new developed areas and changes in risks caused by new developments. A CMP without mapped flood risk assessments is not a CMP. • Flood risks assessments should include risks assessments for various return periods (as a minimum 1% and 10% AEP), various development scenarios (with and without proposed development) and include climate change (changes in rainfall and sea level rise). Very similar to what was undertaken for the Richmond and Motueka CMP's. • Without this information it is not possible to take any flooding risks into consideration. • In my professional life I have seen too many examples where flooding would have been avoided when flood risks assessments would have been considered. Many flooding occurrences in this region have been totally avoidable and the current approach using flooding as an afterthought is simply not acceptable and exposes the council and the community to avoidable risks to people and property. • I am missing an Aspirations and Targets table as is included for the other aspirations. Development • I generally agree with the observations under key-issues why there as been a low uptake of water sensitive design. The lack of clarity in structure planning is one of these. The MMP provides the opportunity to do better, but this does need a comprehensive approach at the initial planning stages,		

			not as an afterthought. These approached include minimizing earthworks, avoiding large modifications of the landform incl compaction, retaining intermittent and permanent streams, using a 'green-finger' approach in the initial stages of the design, minimization of impervious areas and finally fit for purpose stormwater treatment (happy to help). • The 10-year target for Aspiration 4.1 and 4.2 should include the need to require wsd in addition to the support and guidance. There should be no room for not having to provide stormwater treatment. • Action 1.7. The hard surfaces (pedestrian areas and carparks) are most polluted in the wharf area, so planter boxes (typically above ground) would not be able to catch stormwater runoff from those areas. I suggest providing 'raingardens'. A practice note on how to design these can be found in TDC files here. Integration • I suggest changing improvement action 1.10 into "Look for and implement stormwater improvement opportunities in other council projects e.g. improved quality treatment" such as enhanced stream habitat (incl riparian planting) and related to roadworks. Summary • Should be reviewed as result of suggested amendments discussed above Further comprehensive catchment planning recommendations: a. That comprehensive catchment planning is undertaken for catchments that include the proposed development areas in PC81 b. If not done by council, catchment planning is to be undertaken by the applicant for the whole drainage catchment, not just the proposed development area, including consideration of future development in that same drainage catchment. c. That the outcomes of the catchment planning need to help identify mitigation options (avoid first, then minimize, then mitigate) d. That catchment planning is undertaken from the start of the planning process e. That for all catchments in Māpua that include proposed developments under PC81 a catchment plan is providing meeting		

			the needs to support the proposed development process (see Table 3) and meet the conditions in the Comprehensive Stormwater Discharge Consent. f. That the same approach is also required for other proposed develop areas outside Māpua g. That the lack of catchment plans that meet the requirements recommended in section 4.8 is used as one of the reasons for deferral. See the full submission for full details.		
OS246.3	2-Out of Scope	Amend	Amend PC81 to prevent stream loss, piping and modification except in limited circumstances, require protection and restoration of riparian margins, and strengthen stream ecosystem protection provisions. Outcomes referenced from the Long Bay Structure Plan Environment Court process include: • Stream loss, including ephemeral or second order streams, should be avoided. (s1) Intermittent streams / headwaters / ephemeral streams have high ecological value and perform functions that affect the entire downstream network (s2). • Water quality baseline is stream health under good land management (s3) • Riparian margins should be retained or restored (s4) • Land modification and soil compaction should be minimized (s5 and s8) • In addition to the traditional peak flow only approach, changes to hydraulic response caused by runoff volume, frequency, duration, velocity and baseflow negatively affect stream health and should be minimized. • Effective impervious cover should be kept below 10% to protect sensitive stream environments and below 25% to protect already impacted stream environments • Low Impact Design is required in managing stormwater runoff to minimise the effects on the receiving water environment (s8) • Identifying potential effects from development and required mitigations should be undertaken on a catchment wide bases and cannot be left to subdivision-by-subdivision or case-by-case stages	The submitter considers streams can currently be modified or removed too easily and that stream ecosystems are not adequately protected by the proposed provisions. Stream ecosystem issues include - Stream ecosystems are not adequately protected, Streams can easily be deleted or modified under PC81. Current provisions such as in 6.3.3.6 are to generic and not explicit enough to achieve the objective to protect and enhance the stream environment. This is very evident in recent developments in TDC where many streams have disappeared. This topic is widely discussed in many locations in section 3 in the submitters full submission. Stream health can be negatively impacted by poor land management such as the removal of riparian margins or allowing cattle access. (see Table 2 in the submitters full submission).	The submitter seeks stronger planning provisions to protect streams, riparian margins and stream ecosystems. The submitter has referred to the outcomes from the Long Bay Structure Plan Environment Court Case, which they state is highly relevant to PC81. Rerouting of seaton valley Stream is concerning and inconsistent with the decision sought by the submitter. Stream ecosystem issues include - Stream ecosystems are not adequately protected, Streams can easily be deleted or modified under PC81. Current provisions such as in 6.3.3.6 are to generic and not explicit enough to achieve the objective to protect and enhance the stream environment. This is very evident in recent developments in TDC where many streams have disappeared. This topic is widely discussed in many locations in section 3 in the submitters full submission. Stream health can be negatively impacted by poor land management such as the removal of riparian margins or allowing cattle access. (see Table 2 in the submitters full submission).

			With regard to point 7 above, the court accepted the need for Low Impact Design (s8). Pollutant concentrations can be reduced by 40% to 99% by the use of well-designed stormwater treatment devices, compared with very small reductions from traditional detention ponds alone. (s8). Avoidance and source control are pivotal to a successful LID approach. A treatment train (multiple devices, at source and at the bottom of a catchment) are especially warranted when discharging into high quality, sensitive stream. Working with nature was accepted by the court using a framework that protects natural drainage functions, restoration potential, landforms and waterways and limits earthworks/compaction, amounting in substance to working with natural systems. (s10) Stream ecosystems recommendations: a. Deletion, piping and modification of streams is not allowed, except for the purpose of ecological improvement to the approval of the freshwater ecologist of TDC b. Only piping/bridging of streams is allowed for access (roads, driveways. Cycling/walking). c. 1st order streams need a riparian margin of at least 15m on either side and all other streams need to be a minimum of 10 meter (based on past experience but input from a freshwater ecologist is needed to confirm the classification and widths). d. Stream morphology needs to be kept or restored to a natural state (no rock lining, etc) e. Any stream modifications (except for enhancements) are a discretionary activity and need to be approved by a freshwater ecologist on behalf of council. Riparian margins are defined as being part of the stream ecosystem and part of this requirement f. In general, it is important that improvements to the stream ecosystem need to be made as easy as possible (permitted). This includes providing for fish passage, enhancing/restoring riparian margins, restoring stream geomorphology to its original natural state. Maybe a simple approval from the council freshwater ecologist would be adequate. g. In any ecological assessment of the health of streams, the potential health of the stream under good land management should be used as reference not a current state under poor land management.		
OS246.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Amend	Add objectives, policies and rules requiring overland flow paths to be identified, mapped, protected and maintained, and use consistent terminology throughout the plan. I recommend additional policies and rules related to overland flow:	The submitter considers overland flow paths are important for managing flood risk and are not adequately recognised or protected in PC81. I'm concerned with the statement related to overland flow paths (here referred to as secondary flow paths, in the Infrastructure Report (App.8) stating "The implications for Māpua should be	The submitter seeks specific objectives, policies and rules requiring identification and protection of overland flow paths. I'm concerned with the statement related to overland flow paths (here referred to as secondary flow paths, in the Infrastructure Report (App.8) stating "The implications for Māpua

			At a policy/objectives level - Overland Flow paths have to be identified and protected and continuity in conveyance with up and down stream flow paths has to be ensured in perpetuity. For the rules/requirements - Overland flow path has to be identified (on a map) and any proposal has to show that these are protected and sized appropriately. Any necessary diversions have identified and sized appropriately. Overland flow paths cannot be blocked (by obstructions such as fences or otherwise). Overland flows cannot be piped. If piping is unavoidable (to be proven), then the piped sections needs to be as short as possible and sized for a 1 in 500 year storm. In this case it is also required that a risk assessment is carried out in case the piped section is overwhelmed or blocked. I suggest that the above wording is peer reviewed against best practice, both tehnically and in planning jargon.	confirmed as part of future stormwater planning". In my experience, about 50% of habitable floor flooding is caused by overland flow. Many flooding events in the region over the last few decades were caused by overland flow caused by blocked pipes. Overland flow paths are not assets. Any requirements in The Land Development Manual are helpful but hard to enforce as non-assets. The purpose of overland flow is in part to carry excessive flows. So, sizing them for only 1 in 10 or 1 in 100 year flows, is not adequate. Overland flows have to be able to convey excessive flows (including climate change). I suggest to at least consider a 1 in 500 or 1 in 1000 year storm to understand the risk when these extreme events do occur so risk to life and property can be minimised. It is therefore important to protect overland flow path in the requirements of PC81.	should be confirmed as part of future stormwater planning". In my experience, about 50% of habitable floor flooding is caused by overland flow. Many flooding events in the region over the last few decades were caused by overland flow caused by blocked pipes. Overland flow paths are not assets. Any requirements in The Land Development Manual are helpful but hard to enforce as non-assets. The purpose of overland flow is in part to carry excessive flows. So, sizing them for only 1 in 10 or 1 in 100 year flows, is not adequate. Overland flows have to be able to convey excessive flows (including climate change). I suggest to at least consider a 1 in 500 or 1 in 1000 year storm to understand the risk when these extreme events do occur so risk to life and property can be minimised. It is therefore important to protect overland flow path in the requirements of PC81.
OS246.5	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words	Amend	Add a definition for overland flow/overland flow paths, use that terminology consistently, and clarify the relationship between Water Sensitive Design and Low Impact Design. I recommend that only the term Overland Flow / Overland Flow Paths is used and is included in Chapter 2 and that the following definition is used - Overland flow paths are routes that the stormwater will take: •before entering a piped stormwater system or when no reticulated system is present, or •when the capacity of the piped network is exceeded or •when pipes are (partially) blocked.	The submitter considers current terminology is inconsistent and may create confusion regarding stormwater management requirements.	The submitter seeks amendments to definitions and terminology used in PC81. Secondary flow path is included in Chapter 2 of the TRMP: Meaning of Words but the definition is limited and Overland flow is missing Overland Flow (parts) is a more commonly used and better understood term (outside the industry) I recommend that only the term Overland Flow / Overland Flow Paths is used and is included in Chapter 2 and that the following definition is used - Overland flow paths are routes that the stormwater will take: •before entering a piped stormwater system or when no reticulated system is present, or •when the capacity of the piped network is exceeded or •when pipes are (partially) blocked.

					The terminology in PC81 is inconsistent and can be confusing, such as: •Overland flood flow and Overland flood flow paths •Overland stormwater flows •Secondary flows and secondary flow paths, and Secondary stormwater flow paths.
OS246.6	2-Out of Scope	Amend	Amend PC81 to require management of runoff effects, stormwater treatment devices, protection of natural wetlands, minimisation of impervious surfaces, minimisation of landform modification and implementation of the submitter's recommended Water Sensitive Design approach. Changes in runoff are to be minimised following the full LID process - a. LID is a full design philosophy, a full design process starting at the very early stages of planning . b. PC81 should require that the full LID process is followed. c. Applicants (developer) and Council should use LIS experts to guide the LID process (requirement). I note that many traditional stormwater engineers do not have this expertise. d. I have developed Table 3 outlining the full LID process and recommend this being included in PC81 e. This needs table to be part of PC81 to ensure it is enforceable, I'm just not sure what the best location is. Typically (in TDC) LID is understood to only include steps 4 and 5. f. Table 3 provides the steps and components of a LID approach. In some case some steps or parts have to be repeated in an iterative approach. g. I suggest having the table reviewed by a few other LID experts to ensure good practice is followed and when translated into planning-jargon nothing is lost in translation. See the submitters full submission (Table 3) for the full steps they are recommending. That the effective impervious area cannot exceed 25% in most streams and 10% in highly sensitive streams as defined during the LID process. See the submitters full submission (Table 2) for full method.	The submitter considers current provisions do not adequately address runoff quantity and quality effects, stormwater treatment requirements or protection of receiving environments. There is inadequate attention to changes in runoff (volumes, flows, duration, infiltration) and how to minimize these changes. Parts of the text in PC81 talk about "accommodate runoff" which appears to be allowing any increase (PC81, s 16.13D) as long as it is effectively piped. See Table 2, item 5 for further discussion and explanation. There is a lack of understanding of the full LID process in PC81 and in the section 32 report. Current practice is that LID is often incorrectly understood to be the need to provide for 'stormwater treatment devices' such as wetland. This is an incorrect interpretation. Consequently, LID and stormwater management and often considered at the end of a design process, as an afterthought and not part of a full design process. The need for 'fit-for-purpose' stormwater treatment is not well articulated. Just referring to LID is not adequate and leaving it to the LDM is inadequate to enforce. TDC has implemented many detention systems (ponds, dry ponds, etc) but these have very limited effectivity. Well-designed stormwater treatment devices will reduce runoff (flows, volumes) and will reduce pollutant loads have seen proposals (Seaton Valley) where a proposed wetland for stormwater treatment was integrated into a natural wetland. Natural wetlands should be fully protected and cannot be used for stormwater treatment	The submitter seeks stronger provisions requiring stormwater runoff management and treatment measures. There is inadequate attention to changes in runoff (volumes, flows, duration, infiltration) and how to minimize these changes. Parts of the text in PC81 talk about "accommodate runoff" which appears to be allowing any increase (PC81, s 16.13D) as long as it is effectively piped. See Table 2, item 5 for further discussion and explanation. There is a lack of understanding of the full LID process in PC81 and in the section 32 report. Current practice is that LID is often incorrectly understood to be the need to provide for 'stormwater treatment devices' such as wetland. This is an incorrect interpretation. Consequently, LID and stormwater management and often considered at the end of a design process, as an afterthought and not part of a full design process. The need for 'fit-for-purpose' stormwater treatment is not well articulated. Just referring to LID is not adequate and leaving it to the LDM is inadequate to enforce. TDC has implemented many detention systems (ponds, dry ponds, etc) but these have very limited effectivity. Well-designed stormwater treatment devices will reduce runoff (flows, volumes) and will reduce pollutant loads have seen proposals (Seaton Valley) where a proposed wetland for stormwater treatment was integrated into a natural wetland. Natural wetlands should be fully protected and cannot be used for stormwater treatment

			Natural wetlands should be fully protected and cannot be used for stormwater treatment Stormwater treatment devices are required to treat stormwater runoff quantity and quality (reduce runoff flows and volumes and reduce pollutant loads) before discharge The LID process and LDM need to be followed to determine the location and design of these treatment devices These stormwater treatment devices need to assist in meeting the Effective Impervious criteria as recommended in 3.6.2b of the submitters full submission Stormwater treatment devices are required to treat stormwater runoff quantity and quality (reduce runoff flows and volumes and reduce pollutant loads) before discharge The LID process and LDM need to be followed to determine location and design of these treatment devices. These stormwater devices need to assist in meeting the Effective Impervious criteria as recommended in 3.6.2b of the submitters full submission If wetlands are designed for stormwater treatment, they cannot be part of or integrated with natural wetlands. Any discharges from a constructed wetland (stormwater treatment device) should bypass natural wetlands. Council needs to confirm in PC81 that this will be addressed in Seaton Valley as well as for any other wetlands in or downstream of development areas proposed under PC81 Stormwater runoff recommendations - a. That changes in runoff are to be minimized following the process included in 4.8 of the submitters full submission including but not limited to: •Limiting modification in landform and minimizing compacted areas •Minimising impervious coverage (on public and private land) •Providing Stormwater Treatment devices (quantity and quality) •Minimise (efficient) piping as this will speed up runoff and case	There is inadequate attention to changes in runoff (volumes, flows, duration, infiltration) and how to minimize these changes Parts of the text in PC81 talk about “accommodate runoff” which appears to be allowing any increase (PC81, s 16.13D) as long as it is effectively piped. c. See Table 2, item 5 in the submitters full submission for further discussion and explanation. a. Changes in landform are not recognized as negatively contributing to stream health b. I did not find a confirmation of the problems in relation to the hydrological response caused by changes to the landform, comprehensive earthworks and compaction in PC91 nor in the s32 report. c. Changes in landform also have other effects such as impact on the natural landform (not part of my submission)	There is inadequate attention to changes in runoff (volumes, flows, duration, infiltration) and how to minimize these changes Parts of the text in PC81 talk about “accommodate runoff” which appears to be allowing any increase (PC81, s 16.13D) as long as it is effectively piped. c. See Table 2, item 5 in the submitters full submission for further discussion and explanation.

			higher peak flows b. That the effective impervious area cannot exceed 25% in most streams and 10% in highly sensitive streams as defined during the LID process (section 3) •For method see Table 2 in the submitters full submission. This model also allows to account for proposed mitigation Recommend that a. changes in landform are to be minimized (working with the land) b. That areas that need compaction are to be limited to minimize changes in stormwater runoff and to protect groundwater infiltration. c. Table 3 is intended to meet this requirement in a realistic way and as part of an iterative process		
OS246.7	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Amend Māpua/Ruby Bay provisions to require comprehensive catchment planning, Water Sensitive Design, stream protection, flood risk assessment and stormwater mitigation before development proceeds.	The submitter considers existing catchment planning and stormwater assessment work for Māpua/Ruby Bay is incomplete and does not adequately support the development proposed through PC81	The submitter seeks amendments to Māpua/Ruby Bay provisions to address stormwater management, flooding, stream protection and catchment planning.
OS246.8	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > Schedules > Schedule 17.14A: Deferred Zone Locations	Amend	Require adequate stormwater and wastewater infrastructure capacity before deferred zoning is removed, and retain deferral where necessary assessments and infrastructure capacity have not been demonstrated.	The submitter considers development should not proceed where infrastructure assessments are incomplete or where stormwater and wastewater capacity issues remain unresolved.	The submitter supports infrastructure constraints being considered when determining whether land should remain deferred.
OS246.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Amend	Amend PC81 and/or associated provisions so that wastewater capacity assessments address wet weather overflows, and retain deferred zoning where adequate wastewater performance cannot be demonstrated. One option to address this issue is to move towards a zero-overflow network using a continuous improvement approach when maintaining and renewing the network. Because a zero-overflow network is not realistically possible, I have seen interpretations that a 1 in 5-year wet weather overflow frequency would be an acceptable interpretation of that. The best option in my opinion is to change/clarify section 36.2.4 of the TRMP (ideally as part of this plan change) to allow wet weather overflows from wastewater networks and set a wet weather overflow frequency based on a cost-benefit assessment followed by a consent application. I have been involved in these processes many times and I'm happy to explain more. This option has been refused by TDC thus far. Third option is to identify an acceptable approach for PC81 while	The submitter considers current assessments rely on theoretical design capacity rather than actual network performance and do not adequately address wet weather wastewater overflows. a. When development occurs, a wastewater network is required to service new properties b. Wastewater networks always have a limited capacity. Wastewater networks overflow during some rainfall events including new developments. I have never seen a wastewater network that doesn't overflow. c. Very important: The real behaviour of a network is often different to what a network is designed for. d. Many network operators in NZ use calibrated and verified wastewater models to monitor actual behaviour. e. Although TDC has some hydraulic wastewater models (see App.8, section 1.3), the performance	The submitter seeks amendments to wastewater provisions and infrastructure assessment requirements. a. When development occurs, a wastewater network is required to service new properties b. Wastewater networks always have a limited capacity. Wastewater networks overflow during some rainfall events including new developments. I have never seen a wastewater network that doesn't overflow. c. Very important: The real behaviour of a network is often different to what a network is designed for. d. Many network operators in NZ use calibrated and verified wastewater models to monitor actual behaviour. e. Although TDC has some hydraulic wastewater models (see App.8, section 1.3), the performance

			meeting other TRMP requirements. Consequences for PC81 and assuming the suggested options above are not accepted, I recommend: a. That adequate wastewater network capacity not only includes the provision of adequate trunk sewer capacity based on design parameters, but also includes the need to achieve zero-wet-weather overflow frequency in the networks provided for the development as well as in the networks downstream of the proposed developments. b. That not meeting this requirement is recognized as a reason for deferral as used in the proposed zoning c. I note that this doesn't resolve the risk of uncontrolled overflows. See full submission for full details.	assessments undertaken are based on assessments against a theoretical performance based on design parameters and not based on monitored performance (I was told this in a meeting with wastewater engineers from TDC). f. The overflows during rain events are typically caused by inflow and infiltration into the network (also in new developments). Wastewater overflows are not authorized under the Tasman Resource Management Plan (TRMP 36.2.4). This section is not shown in the PC81 text – not found relevant but it is. Tasman District Council considers every overflow an emergency and the monitoring and enforcement section of TDC accepts this approach. Wet weather overflows occur regularly in the region, not only during very extreme rainfall events which would justify an emergency interpretation. It is my opinion that wet weather wastewater overflows are totally predictable and should not be treated as an emergency. Another issue is that TDC doesn't build 'engineered overflows' because of this TRMP rule, to enable the discharge of wastewater when the network can't cope. The consequence is that when the networks do get overwhelmed, overflows occur from other locations in the network, causing risk to health and properties. The actual performance of a network is almost always different to what it was designed for. TDC have not analysed the performance of the network, using calibrated hydraulic models, including the occurrence of wet weather overflows. It is my experience that monitoring based on observed overflows is typically under reported. My conclusion is that there is no way of knowing what the real performance is of the wastewater networks and it is therefore not possible to assess whether or not upgrades are required to accommodate growth. In addition, networks that are designed to the design criteria that are used, will overflow and	assessments undertaken are based on assessments against a theoretical performance based on design parameters and not based on monitored performance (I was told this in a meeting with wastewater engineers from TDC). f. The overflows during rain events are typically caused by inflow and infiltration into the network (also in new developments). Wastewater overflows are not authorized under the Tasman Resource Management Plan (TRMP 36.2.4). This section is not shown in the PC81 text – not found relevant but it is. Tasman District Council considers every overflow an emergency and the monitoring and enforcement section of TDC accepts this approach. Wet weather overflows occur regularly in the region, not only during very extreme rainfall events which would justify an emergency interpretation. It is my opinion that wet weather wastewater overflows are totally predictable and should not be treated as an emergency. Another issue is that TDC doesn't build 'engineered overflows' because of this TRMP rule, to enable the discharge of wastewater when the network can't cope. The consequence is that when the networks do get overwhelmed, overflows occur from other locations in the network, causing risk to health and properties. The actual performance of a network is almost always different to what it was designed for. TDC have not analysed the performance of the network, using calibrated hydraulic models, including the occurrence of wet weather overflows. It is my experience that monitoring based on observed overflows is typically under reported. My conclusion is that there is no way of knowing what the real performance is of the wastewater networks and it is therefore not possible to assess whether or not upgrades are

				therefore will not meet the TRMP required of zero-overflows.	required to accommodate growth. In addition, networks that are designed to the design criteria that are used, will overflow and therefore will not meet the TRMP required of zero-overflows.

Mathias Schaeffner

Submitter 247

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS247.1	Proposed Plan Change No. 81	Oppose	Stop Plan Change 81 because the highly relevant underlying assuption regarding population growth is not accurate anymore.	I oppose Plan Change 81 in its entirety. I could not find in your online submission tool how to oppose all changes, meaning the entire Plan Change 81, but to be clear I do oppose Plan Change 81 in its entirety. The reason for this is as follows. The main driver behind Plan Change 81 was to provide for a projected high demand for new housing. This was informed by the Council's growth model, which projected high population growths. The Plan Change 81 Evaluation Report (under s32 RMA) itself speaks about "high population growth". Surprisingly this report states it would have been "prepared by the Tasman District Council [in] June 2026". However, in Council's Strategy Finance and Performance Committee meeting on 19 March 2026, the Council changed its position (adopted by resolution) from a projection of high population growth down to medium population growth. The report presented by Council staff to elected members, underlying the changed view regarding population growth, notes relevantly that "growth has slowed recently, reflected in the decline in building consent applications, long-term trends, including historic population variability". Further it says that: "The demographer advised that growth is statistically most likely to follow the Medium projection". The report also contains a "Legal" section which provides: "The Resource Management Act 1991, particularly the National Policy Statement on Urban Development, is also relevant as growth projections inform long-term land-use and infrastructure planning." Given that context, meaning the shift in population growth projections, it comes to a surprise that the Council still keeps going with Plan Change 81 without any change of a different growth model was formally adopted. In regard to risks, the presented staff report presented at the meeting notes that changing the population assumption would "require re-work for the Growth Model and for any Council outputs that rely on it". Regrettably, that did not happen for Plan Change 81. The notification booklet for Plan Change 81 notes in its very first paragraph that this plan change "provides a proactive framework to manage this growth while safeguarding the unique character of our natural and built environments". I agree with the understanding of such a balancing act. Consequently it follows that a plan change cannot move ahead based on false assumption (in this case projected population growth), as this would definitely undermine the purpose of the RMA, namely the sustainable management of natural resources, or as the booklet puts it "safeguarding the unique character of our natural and built environments".	**Summary of Submission:** The submitter opposes Plan Change 81 entirely. They argue the plan is based on outdated high population growth projections, which the Council has since revised to medium growth. They believe proceeding without updating the growth model risks poor planning and undermines sustainable management of natural and built environments as required by the RMA. They seek the plan change to be stopped until accurate assumptions are adopted.

Colin Walker

Submitter 248

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS248.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Make areas along Aranui road zones for compact developments similar to the Scottish system of sheltered housing. These could be in the commercial zone adjacent to the Kite Park, opposite the tennis courts, or opposite the church	I want to see a compact residential development in the Aranui Road area of Mapua. I am one of many retired folk in Mapua who would like to downsize on a flat section in Mapua	The submitter opposes the current proposal. They seek zoning along Aranui Road for compact residential developments, similar to Scotland's sheltered housing. Preferred locations include areas near Kite Park, opposite the tennis courts, or opposite the church. The reason is to provide downsizing options on flat sections for retirees in Mapua.
OS248.2	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > C	Amend	Make areas along Aranui road zones for compact developments similar to the Scottish system of sheltered housing. These could be in the commercial zone adjacent to the Kite Park, opposite the tennis courts, or opposite the church	I want to see a compact residential development in the Aranui Road area of Mapua. I am one of many retired folk in Mapua who would like to downsize on a flat section in Mapua	The submitter requests zoning changes along Aranui Road to allow compact residential developments, similar to Scottish sheltered housing. Preferred locations include areas near Kite Park, opposite the tennis courts, or near the church. Their reason is to provide downsizing options for retirees wanting flat sections in Mapua.
OS248.3	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > M	Amend	Change to 20	30km/hr is to fast for micro mobility	The submitter wants the decision changed to a 20 km/h speed limit. They believe 30 km/h is too fast for micro mobility devices. Their main concern is safety at higher speeds.
OS248.4	Proposed Plan Change No. 81 > Chapter 2: Meanings of Words > S	Oppose	Change as above	Site coverage should be the proportion of building foundation to site area	Submitters oppose the proposal. They seek a change to define site coverage as the proportion of building foundation to site area. This clarifies how site coverage should be measured.
OS248.5	Proposed Plan Change No. 81 > Maps > Zone Maps > 32 - Proposed PC81 - Zone - Mapua, Aranui Rd	Oppose	Make the land in Aranui Road opposite the church, opposite the tennis courts and adjacent to the Kite Park a zone which allows for compact housing such as in the Scottish sheltered housing schemes.	Mapua has a significant proportion of retired residents, many of whom wish to downsize. They need flat sections.	Submitters oppose the current proposal. They seek zoning changes for land on Aranui Road near the church, tennis courts, and Kite Park. The requested zone would allow compact housing similar to Scottish sheltered housing schemes. This change aims to provide flat sections suitable for Mapua's many retired residents who want to downsize.
OS248.6	Proposed Plan Change No. 81 > Maps > Zone Maps > 33 - Proposed PC81 - Zone - Mapua, Cnr Aranui Rd - Tahi St	Oppose	Make the land in Aranui Road opposite the church, opposite the tennis courts and adjacent to the Kite Park a zone which	Mapua has a significant proportion of retired residents, many of whom wish to downsize. They need flat sections.	Submitters oppose the current proposal.

			allows for compact housing such as in the Scottish sheltered housing schemes.		They seek zoning changes for land on Aranui Road near the church, tennis courts, and Kite Park. The request is for a zone allowing compact housing similar to Scottish sheltered housing schemes. This aims to provide flat sections for Mapua's many retired residents who wish to downsize.
OS248.7	Proposed Plan Change No. 81 > Maps > Area Maps > 05 - Proposed PC81 - Area - Mapua, Higgs Rd	Oppose	Restore indicative pedestrian access ways and add more. Make provision for pedestrian access along estuary waterfront from Aranui Road to intersection on Highway and Mapua Drive.	Need more pedestrian ways	Submitters oppose the proposal. They seek restoration of existing pedestrian access ways and additional ones. They want pedestrian access along the estuary waterfront from Aranui Road to the Highway and Mapua Drive intersection. The reason is a need for more pedestrian pathways.
OS248.8	Proposed Plan Change No. 81 > Maps > Area Maps	Amend	The plan needs to provide for recreation.	Walking is a common form of recreation and more walkways are needed so residents don't have to take their cars.	Submitter seeks an amendment to include recreation in the plan. They emphasize walking as a popular recreational activity. More walkways are requested to reduce car use by residents.
OS248.9	Proposed Plan Change No. 81	Amend	Plan change 81 needs to provide for safe, all-tide boat launching ramps and floating marinas for larger boats.	The most common form of recreation for adult males in Tasmania District according to Maritime NZ is boating and sea fishing.	Submitters want Plan Change 81 amended to include safe, all-tide boat launching ramps and floating marinas for larger boats. They argue boating and sea fishing are the most common recreational activities for adult males in the Tasmania District. Providing these facilities will support popular local recreation and improve access.

Annette Le Cren

Submitter 249

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS249.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Please read above for the information	Too much productive land has already been lost in New Zealand. 192 million tonnes of topsoils are lost every year. Due to urban expansion. In the Top of the South, which has a benign	Submitters **oppose** the proposal. They seek protection of productive land.

				climate and generally good soils too much is already been sacrificed for housing.	Concerns focus on significant topsoil loss—192 million tonnes annually—mainly from urban expansion. In the Top of the South, good soils and a mild climate make this loss particularly troubling. They argue too much productive land has already been sacrificed for housing.
OS249.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	It's absolutely crazy how many houses are planned around Mapua. It won't be a nice coastal town any longer.	The land around Mapua is being over developed at the detriment of our coastal village.	The submitter opposes the proposal, concerned about excessive housing around Mapua. They seek to stop overdevelopment, fearing it will harm the town's coastal character. The submitter believes too many houses will negatively impact the village's environment and charm.
OS249.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Currently developers seem to have much say around the country. Lobbying and donating money seem to be prevalent around the country. Good environmental decision making appears to be absent most of the time. Councils are strapped for money and this government seems to be pretty much in control of councils decision making. It's scary. Please TDC, ignore the wishes of developers and do the right thing for our environment. Look after ponds, lakes, wetlands and tree covers in any sort of way.	Please don't be influenced by greedy developers. Take your time on behalf of our beautiful environment.	The submitter opposes the proposal, urging TDC to prioritize environmental protection over developers' interests. They express concern about developers' influence through lobbying and donations, and feel councils lack resources and independence. The submitter asks TDC to safeguard ponds, lakes, wetlands, and tree cover. They request careful decision-making that resists developer pressure to protect the environment.
OS249.4	Proposed Plan Change No. 81 > Chapter 19: Information Required with Land Use Consent or Subdivision Consent Applications	Oppose	Look into building a brand new town in between Brightwater and Wakefield along the Great Taste Trail. a perfect setting and close to all amenities and infrastructure. This will solve the rather messy and expensive destruction of the rest of the Plan change 81 area: Motueka, Mapua, and Wakefield. An expensive and environmental destruction of our beautiful coast line.	This is a suggestion Why doesn't TDC develop a completely new town in between Brightwater and Wakefield right along the Great Taste Trail. There isn't much housing there, the land appears to be rather average, it's close to State Highway 6 and a rather lovely setting. This will solve much of the housing problems and demands, infrastructure is nearby.	The submitter opposes the current proposal and suggests building a new town between Brightwater and Wakefield along the Great Taste Trail. They believe this location is ideal due to its proximity to amenities, infrastructure, and State Highway 6. This alternative aims to avoid costly and environmentally damaging developments in Motueka, Mapua, and Wakefield.

					The submitter sees it as a solution to housing demand while preserving the coastline.

Marion and Peter Satherley

Submitter 250

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS250.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 37 - Proposed PC81 - Zone - Mapua, Stafford Dr	Oppose	Oppose zoning T-237 rural 1 to rural residential serviced. Retain Rural 1 Zone.	We are not opposed to growth. However, we are opposed the growth planned for in PC81, and not just for our property. Our concerns will be highlighted within this submission. Refer to original submission for more information.	Submitters oppose changing zoning from Rural 1 to Rural Residential Serviced. They seek to retain the current Rural 1 Zone. While not against growth, they disagree with the growth outlined in PC81. Concerns extend beyond their property and are detailed in their submission.
OS250.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	We propose and strongly suggest/recommend PC81 for Mapua be placed on pause, especially with the proposed Rural 1 zone changes to allow for a thorough investigation into which possible replacement recreational reserve location could be. At least until there is more clarity of the unknowns of the Tenth's settlement have been worked through.	There are too many unknown scenarios within PC81 to progress the zoning changes within Mapua as per the proposed plan. Refer to original submission for more information,	The submitter requests that PC81 for Mapua be paused. They recommend delaying changes, especially to the Rural 1 zone. This pause would allow time to investigate a suitable replacement recreational reserve location. They want clarity on uncertainties related to the Tenth's settlement before proceeding. Too many unknown factors exist to move forward with the current zoning proposals.
OS250.3	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Oppose Medium density residential zone in Mapua relocate them to the existing towns in our district (Motueka and Richmond) where full TDC and commercial/industrial services already exist. (see more detail in item 9)	Where development occurs so will an increase of users on our road networks. We see within PC81, transportaon informaon is provided within communies. However, I can not see informaon or evidence any improvements to	**Summary of Submission:** The submitter opposes the Medium Density Residential Zone in Mapua,

				transportation networks between Mapua & Motueka; Mapua & Richmond; and Mapua & Nelson have been considered and or planned for. • Routes between Motueka – Mapua, Mapua – Richmond, Mapua – Nelson, are all vital commuting links. Serious transportation requirements need to be considered, discussed, consulted, planned, and actioned to avoid additional l increased road congestion in addition to what residents are already experiencing in Richmond towards Nelson. • The lack of good functional transportation links being provide within the district and beyond will continue to inflict suffering on our residents and tourists alike, especially now, considering the Hope Bypass has now been down graded by the government. Refer to original submission for more information.	suggesting relocation to Motueka or Richmond where services exist. They highlight concerns about increased traffic from development and note a lack of planning for transport improvements between Mapua and surrounding towns. They urge serious consideration and action to prevent further congestion, emphasizing current transport challenges and the impact on residents and tourists.
OS250.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Oppose Medium density residential zone in Mapua relocate them to the existing towns in our district (Motueka and Richmond) where full TDC and commercial/industrial services already exist. (see more detail in item 9)	proposal fails to safeguard the unique natural and built character of Māpua and that future growth should be managed in a manner consistent with local values. Refer to original submission for more information.	**Submission Summary:** The submitter opposes the proposal for medium density residential zoning in Māpua. They request relocating such development to existing towns like Motueka and Richmond, where infrastructure and services are established. Their concern is that the proposal does not protect Māpua's unique natural and built character. They advocate managing future growth in line with local values. Further details are in their original submission.
OS250.5	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Oppose Medium density residential zone in Mapua relocate them to the existing towns in our district (Motueka and Richmond) where full TDC and commercial/industrial services already exist. (see more detail in item 9)	The proposed medium density housing lots vary between 30 homes per hectare (333.3 sq/mtr lots) to 20 homes p/hectare (500 sq/mtr lots), with a height restricon of 8mtrs in Mapua. • Also proposed is that 'sunlight and building design' will have rules to control building shape and placement to: a) protect sunlight to neighbouring properties b) Reduce dominance of larger buildings c) Maintain privacy and outlook	The submitter opposes the proposed medium density residential zone in Mapua, suggesting relocation to established towns like Motueka or Richmond with existing services. They argue the 20-30 homes per hectare and 8m height limits cannot preserve Mapua's unique character. They believe sunlight and building design rules will lead to uniform,

				• This proposed medium density housing that controls the building shape and placement can not and will not safeguard, protect, or maintain Mapua's unique character. (as item 9 & 11) • An 8mtr high home on a 333 to 500 square metre section can not achieve the sunlight and building design rules while maintaining the unique character of Mapua. The only way the sunlight and building design rules can be achieved is by copy cat, look alike two story buildings all street facing, with no backyard privacy from neighbouring yards from a second level. Examples of this are clearly visible in many modern subdivisions elsewhere, including the Richmond West Berryfields and Meadows developments. • As motioned earlier, we are not opposed to growth. However, we are concerned about how this growth is being planned for and implemented. Refer to original submission for more information	two-story homes lacking privacy and character. They support growth but want better planning and implementation.
OS250.6	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans	Oppose	Do not of remove the ability for future homeowners to purchase a stand alone section and select a builder of their choice.	We were extremely disappointed to hear from a TDC Planner at the Mapua public meeting state future developments must be fully designed, including housing design detail from the onset before a resource consent application can be made. This will mean all future developments will only be accessible to larger developer enterprises who have the capacity to provide a full development package, from the initial survey process right through to the final build using their own close associates relationships throughout the complete development process. Refer to original submission for more information.	The submitter opposes removing the option for future homeowners to buy standalone sections and choose their own builder. They are concerned that requiring full development designs upfront limits opportunities to large developers only. This approach may exclude smaller buyers and builders. They seek to retain flexibility for individual buyers in future developments.
OS250.7	Proposed Plan Change No. 81 > Maps > Area Maps	Amend	Reinstate indicative items (walkways, reserves) in Māpua.	Removal of these walkways here will impact the future ability to connect a walking track around the estuary edge from Aranui Road & Tahi St to Higgs Reserve at the western end of the estuary inlet arm. Refer to original submission for more information.	**Summary of Submission** The submitter requests reinstating indicative walkways and reserves in Māpua. They argue removing these walkways will hinder future connections of a walking track around the estuary edge.

					This track would link Aranui Road & Tahi St to Higgs Reserve at the estuary's western inlet.
OS250.8	Proposed Plan Change No. 81 > Maps > Zone Maps > 33 - Proposed PC81 - Zone - Mapua, Cnr Aranui Rd - Tahi St	Support	Support the deletion of the residential zone on both side of Tahi Street near the corner of Aranui Road (T-235a and T-235b). Refer appendix 11	Refer to original submission for more information	The submitter supports the proposal. They want the residential zone removed on both sides of Tahi Street near Aranui Road (T-235a and T-235b). For full reasons, see their original submission and appendix 11.
OS250.9	Proposed Plan Change No. 81 > Maps > Zone Maps > 33 - Proposed PC81 - Zone - Mapua, Cnr Aranui Rd - Tahi St	Oppose	We strongly OPPOSE the proposal to allow 8mtr high commercial buildings along the south side Aranui Road. Refer appendix 11	8mtr high buildings along this strip will block the vista's from the bend on Aranui Road as one travels either by foot, bicycle, or any motorised vehicle along Aranui Road toward Refer to original submission for more information	The submitter **opposes** allowing 8-meter high commercial buildings along the south side of Aranui Road. They seek to prevent these buildings. Their main concern is that tall buildings will block important views along Aranui Road for pedestrians, cyclists, and drivers.

Chris Rika

Submitter 251

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS251.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Amend	I support Papakainga housing development on Stringer road.But as a resident of Galeo estate I oppose a road connecting the Papakainga housing development to Redmill road .	I am concerned that a road connecting Papakainga project on section T-226 will increase traffic through our suburb to an unacceptable level.	Submitter supports the Papakainga housing development on Stringer Road. They oppose a road connecting this development to Redmill Road. Their concern is increased traffic through Galeo Estate. They believe this would create unacceptable traffic levels in their suburb.
OS251.2	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	I support Papakainga housing development on Stringer road.But as a resident of Galeo estate I oppose a road connecting the Papakainga housing development to Redmill road .	I am concerned that a road connecting Papakainga project on section T-226 will increase traffic through our suburb to an unacceptable level	The submitter supports the Papakainga housing development on Stringer Road. However, they oppose a road connecting this development to Redmill Road.

					Their concern is that the new road would increase traffic through Galeo Estate to an unacceptable level.

Matt Astell

Submitter 252

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS252.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Opposes the proposed intensification in the Medium Density Residential Zone near Richmond, 6.8.3.10. Don't allow the level of intensification that you are proposing.	I oppose 6.8.3.10 on the Medium Density Residential Zone provides for residential intensification through a combination of infill and redevelopment in the existing central residential area close to the town centre and to Richmond area up to Hill Street. Intensification to the degree being put forward will change the character and general well being of Richmond. I have lived in Auckland and saw first hand how the 'proposals' that were pitched as providing lots of great living options for people were not what actually happened. Poor house design meant over heated homes, windows that couldn't open wide enough to properly ventilate the home, no place for storage of household items, single car spaces for 3-4 bedroom homes meant more cars parked on the street which meant traffic could only drive in one direction at a time (single lane caused by parked cars) poor visibility when driving out of driveways (due to parked cars... I had several near misses while driving in Auckland due to this). Kids can't ride their bikes or play at the end of a cul-de-sac due to parked cars. Further, on the 'plans' trees are always included, however, the reality was the 2 sections behind us had 18 mature trees removed and once the 16 units with 16 car spaces was completed, no trees were planted. Goodbye native insects and birdlife. Some managed to plant small shrubs out the front, lots of concreted backyard spaces. We then witnessed this happen in every single housing development that was taking place in Howick. You should pop up to Howick and look at how this is damaging what was once a nice seaside community. Building so close to the boundary meant we saw hedges being removed, and the softening effect (and therapeutic effects of a green garden) of trees meant people lost their privacy and serenity in their own back yard. We witnessed three story apartment blocks actually block the sunlight from their neighbours (and destroyed their privacy).	**Submission Summary:** The submitter opposes intensification in the Medium Density Residential Zone near Richmond (6.8.3.10). They argue it will harm Richmond's character, reduce privacy, and limit children's play space. They cite poor design, parking issues, loss of trees, and negative impacts seen in Auckland and Howick. They also highlight affordability concerns, noting new homes offer less land and value for similar prices.

				Infill housing takes away the ability of first home buyers to get on to the property ladder and add value to their first purchase (by making renovations, cleaning up the garden). Young families have no where for their children to play as there is no land, just a 2 or 3 story unit with 1.5m gap around it. These developments are often pitched as being cheaper options however they are rarely that much cheaper. My wife's parents home is valued around 1.2 million (3bdrm on 750m2), and across the road the new infill homes on 1/5 of the land are being priced at $1.1 million. Way less land, no ability to add value and only $100,000 cheaper. It will make people poorer in the long term.	

David Christopher and Priscilla Jane Young

Submitter 253

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS253.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Amend	Consider scaling back proposed intensification and population growth in Māpua and Coastal Tasman, and take a precautionary approach to future growth.	Māpua is a confined coastal area that may become overwhelmed by population growth and tourism pressures, and question whether projected growth will occur. Concerns about congestion, infrastructure capacity, and long-term sustainability. Refer to original submission for more informaiton	**Summary of submission:** The submitter requests reducing planned intensification and population growth in Māpua and Coastal Tasman. They advocate a precautionary approach to future growth. Concerns focus on Māpua's limited space, potential overcrowding, tourism impacts, congestion, and infrastructure strain. Doubts are raised about whether the projected growth will materialize.
OS253.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.20 Methods of Implementation	Amend	Upgrade roading infrastructure and address traffic safety issues associated with growth in Māpua and Coastal Tasman.	Existing roading capacity has already compromised safety and that additional growth will increase traffic movement and congestion. Concerns about traffic entering and leaving the bypass and the suitability of existing roads. Refer to original submission for more information	**Summary of Submission:** The submitter requests upgrading roading infrastructure in Māpua and Coastal Tasman. They highlight current safety issues due to limited road capacity. Growth is expected to increase traffic and congestion.

					Concerns focus on traffic flow near the bypass and road suitability.
OS253.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services > 6.3.20 Methods of Implementation	Amend	Carefully assess infrastructure capacity and upgrade requirements before accommodating further growth.	Recent investment in water supply, wastewater disposal, and internet services and question whether additional upgrades will be required to support a larger population. Refer to original submission for more information	**Summary:** The submitter requests a thorough assessment of current infrastructure capacity before allowing further growth. They highlight recent investments in water, wastewater, and internet services. They question if more upgrades are needed to support a larger population. Refer to the original submission for detailed information.
OS253.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.2 Land Effects from Urban Growth	Amend	Protect productive rural land and give greater consideration to productive land values when planning future development. Refer to original submission for more information	Housing development is changing the landscape and removing productive land, including former orchard areas that remain productive. Refer to original submission for more information	**Summary of Submission** The submitter seeks protection of productive rural land. They want greater emphasis on the value of productive land in planning future development. The concern is that housing development is reducing productive areas, including former orchards still in use.
OS253.5	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision	Amend	Require greater attention to stormwater runoff and drainage effects associated with development.	Steep driveways, site disturbance and development practices are increasing runoff and affecting downstream areas. Refer to original submission for more information	The submitter requests stronger controls on stormwater runoff and drainage in new developments. They are concerned that steep driveways and site disturbances increase runoff. This runoff negatively impacts downstream areas. They seek improved management measures to address these effects.
OS253.6	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.3 Visual and Aesthetic Character	Amend	Retain established trees wherever possible during development.	Subdivisions often involve removal of large mature trees and result in a loss of climate change mitigation benefits. Refer to original submission for more information	**Summary of Submission** The submitter requests that established trees be retained during development wherever possible. They emphasize that subdivisions often lead to the removal of large, mature trees. This removal reduces climate change

					mitigation benefits. The submitter refers to their original submission for further details.
OS253.7	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Ensure development is designed to work with the land rather than extensively modifying it.	refer to previous Rural 3 design principles and express concern about heavily modified landscapes and intensified development. Refer to original submission for more information.	**Summary of Submission:** The submitter seeks that development respects the natural landform, avoiding extensive modification. They emphasize adherence to previous Rural 3 design principles. Concerns are raised about heavily altered landscapes and increased development intensity. Refer to the original submission for detailed reasoning.
OS253.8	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Exercise greater caution regarding development on land subject to terrain, flooding, or future inundation risks. Apply a stronger climate resilience approach to development decisions in coastal areas.	Steep clay-and-stone soils, cliff-edge locations, flood-prone sites and areas they consider vulnerable to future sea inundation. Refer to original submission for more information	**Summary of Submission:** The submitter requests more caution on developments in areas with terrain, flooding, or future sea inundation risks. They seek stronger climate resilience in coastal development decisions. Concerns focus on steep soils, cliffs, flood-prone zones, and vulnerable coastal areas. Refer to the original submission for detailed reasons.

Ainslie and James Pomeroy

Submitter 254

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS254.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Amend	Amend 6.16.3.1 as follows: To manage the effects of the expansion of Brightwater on land of high productive value by providing for future residential areas south east of Snowdens Bush and for further lots on Watertank Hill, and by ensuring efficient use of land in the Brightwater Development Area (between Pitfure Stream, State Highway 6, and Lord Rutherford Road; and between Katania Heights Road and the Brightwater Devia on State Highway).	This submission relates directly to new residential zones mapped in Brightwater in the Katania Heights subdivision outlined in the plan changes as 'the area between Katania Heights Road and the Brightwater Deviation on State Highway'. The proposed map shows a housing development and public walkway earmarked for	The submitter seeks to amend policy 6.16.3.1 to guide Brightwater's expansion, focusing on managing effects on high productive land. They support residential development south-east of Snowdens Bush and additional lots on Watertank Hill. However, they oppose dense housing and a public walkway on the steep northeast side of Katania Heights hill, favoring only the triangular base area for housing.

				the northeast side of the Katania Heights hill, a steep piece of land in a prominent position behind the Brightwater township. There is a triangular area at the base of the hill which we see the only part of this land suitable for housing. This submission opposes the proposal to develop this particular land into dense residential lots, and proposed walkway, specifically changes to policies 6.16.3.1,6.16.3.1A and 6.16.3.1B. Refer to original submission for more information	They request changes to policies 6.16.3.1, 6.16.3.1A, and 6.16.3.1B.
OS254.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Amend	Amend 6.16.3.1A as follows: To require higher density housing options and a variety of lot sizes on land within the Brightwater Development Area between Pitfure Stream, State Highway 6, and Lord Rutherford Road; and the area between Katania Heights Road and the Brightwater Devia on State Highway which achieves a high standard of residential amenity through design in accordance with the Urban Design Guide (Part II, Appendix 2).	This submission relates directly to new residential zones mapped in Brightwater in the Katania Heights subdivision outlined in the plan changes as 'the area between Katania Heights Road and the Brightwater Deviation on State Highway'. The proposed map shows a housing development and public walkway earmarked for the northeast side of the Katania Heights hill, a steep piece of land in a prominent position behind the Brightwater township. There is a triangular area at the base of the hill which we see the only part of this land suitable for housing. This submission opposes the proposal to develop this particular land into dense residential lots, and proposed walkway, specifically changes to policies 6.16.3.1,6.16.3.1A and 6.16.3.1B.	The submitter seeks to amend policy 6.16.3.1A to require higher density housing and varied lot sizes within the Brightwater Development Area, specifically between Katania Heights Road and the Brightwater Deviation. They oppose dense residential development and the proposed walkway on steep land behind Brightwater township, favoring only the triangular base area for housing. Concerns focus on maintaining residential amenity per the Urban Design Guide.

				Refer to original submission for more information	
OS254.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.16 Brightwater > 6.16.3 Policies	Amend	Amend 6.16.3.1B to the following: To require higher density housing options and a variety of lot sizes on land within the Brightwater Development Area between Pitfure Stream, State Highway 6, and Lord Rutherford Road; and the area between Katania Heights Road and the Brightwater Devia on State Highway through the use of a mandatory mix of lot sizes and encourage Compact Density Development in this area through the use of a non-notification on provision.	This submission relates directly to new residential zones mapped in Brightwater in the Katania Heights subdivision outlined in the plan changes as 'the area between Katania Heights Road and the Brightwater Devia on State Highway'. The proposed map shows a housing development and public walkway earmarked for the northeast side of the Katania Heights hill, a steep piece of land in a prominent positon behind the Brightwater township. There is a triangular area at the base of the hill which we see the only part of this land suitable for housing. This submission opposes the proposal to develop this particular land into dense residential lots, and proposed walkway, specifically changes to policies 6.16.3.1,6.16.3.1A and 6.16.3.1B. Refer to original submission for more information	The submitter seeks to amend policy 6.16.3.1B to require higher density housing and a mix of lot sizes in the Brightwater Development Area. They support compact density development with non-notification provisions. They oppose dense residential development and a public walkway on steep land near Katania Heights, suggesting only the triangular base area is suitable for housing. They request changes to policies 6.16.3.1, 6.16.3.1A, and 6.16.3.1B.
OS254.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 29 - Proposed PC81 - Zone - Brightwater Central	Oppose	We Ainslie and James Pomeroy ﴾the submitters﴿ seek that Tasman District Council reject the provisions of Plan Change 81 that enable residential development and associated public access infrastructure on the land between Katania Heights Road and the Brightwater Deviation State Highway.	Require any future proposals affecting this land to be supported by independent assessments of: o pedestrian safety; o traffic safety; o geotechnical suitability and slope stability; o landscape and visual amenity effects; o infrastructure servicing requirements; and o whole-of-life public maintenance costs. 6. Recognise the importance of maintaining the prominent hillside backdrop to	The submitters, Ainslie and James Pomeroy, oppose Plan Change 81. They seek rejection of residential development and public access infrastructure between Katania Heights Road and Brightwater Deviation State Highway. They request independent assessments on safety, geotechnical stability, landscape effects, infrastructure, and maintenance costs. They emphasize protecting the hillside backdrop and the cumulative visual and community impacts. They oppose new lots accessing via the existing right-of-way.

				Brightwater and give significant weight to the cumula ve visual, environmental and community impacts of development on this elevated and highly visible land. 7. Decline any proposal that would require additional residential lots to obtain access via the existing right-of-way serving the Brightwater water reservoir and the existing residential properties. Refer to original submission for more information	
OS254.5	Proposed Plan Change No. 81 > Maps > Area Maps > 02 - Proposed PC81 - Area - Brightwater, Katania Heights	Oppose	Remove the proposed public walkway shown within the Katania Heights development area.	Retain the existing pedestrian connecton via the established footpath network, which already provides a safe, direct and accessible route between Katania Heights and Brightwater. Encourages pedestrian crossing at blind crest. Refer to original submission for more information	Submitters oppose the proposed public walkway in Katania Heights. They seek its removal. They prefer retaining the existing footpath network. The current routes are safe, direct, and accessible. Concern raised about encouraging pedestrian crossing at a blind crest. Refer to original submission for detailed reasons.

Sam Godsiff

Submitter 255

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS255.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Removal of the propsoed road connection from Redmill Road to Stringer Road.	We support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone. However, our submission relates solely to the potential creation of a public vehicle connection between Stringer Road and Redmill Road. We oppose any outcome that enables or relies upon Redmill Road becoming a through-road for daily traffic associated with	**Submission summary:** The submitter opposes the proposed road connection

			Please see our full submission in the supporting documents for more details.	Site T-226 or surrounding future development. In our view, such a connection would create significant and unnecessary adverse effects on the existing Redmill Road community while providing little additional benefit to the wider transport network. We oppose, and seek protection against, any provision for or reliance upon a vehicle through-connection between Stringer Road and Redmill Road being treated as an expected or default outcome of the rezoning or of subdivision. Please see our supporting documents for our full submission.	between Redmill Road and Stringer Road. They support rezoning site T-226 to Papakāinga Zone but not the vehicle link. Concerns include increased traffic on Redmill Road causing harm to the community. They seek removal of any plans or expectations for this through-road connection.
OS255.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 42 - Proposed PC81 - Zone - Moutere, Stringer Rd	Support	we support the rezoning of site T-226 (Stringer Road, Redwood Valley) from Rural 3 to the Papakāinga Zone.	As directly affected residents, we support the rezoning of Site T-226 from Rural 3 to the Papakāinga Zone and fully support the aspirations of enabling whānau to live on their ancestral land. Nothing in this submission should be interpreted as opposition to papakāinga development or the objectives of Plan Change 81.	Submitters support rezoning site T-226 (Stringer Road, Redwood Valley) from Rural 3 to Papakāinga Zone. They are directly affected residents and back enabling whānau to live on ancestral land. No part of the submission opposes papakāinga development or Plan Change 81 objectives.

Anna Ellery Anna Ellery

Submitter 256

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS256.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 62 - Proposed PC81 - Zone - Wakefield, Bird Ln	Oppose	I would like Council to either reject or delay the proposed commercial zoning near my property until proper checks have been done.	I would also like Council to: · clearly explain what kind of commercial activity could happen there; · show how close it would be to nearby homes; · have an independent vibration assessment done; · set clear limits on vibration, noise and hours of work; · limit heavy trucks and loading near houses; · require checks of nearby homes before work starts; · require monitoring if heavy machinery is used; · make developers responsible for any damage they cause;	The submitter opposes the proposed commercial zoning near their home. They seek Council to reject or delay the proposal until thorough checks are completed. Key requests include clear details on commercial activities, proximity to homes, and independent vibration assessments. They want strict limits on noise, vibration, work hours, truck movements, and developer responsibility for damages. Concerns focus on property damage, disturbance, reduced enjoyment, and property value loss.

				· provide proper setbacks or buffer areas between businesses and homes. My concerns are that this could: · shake or disturb my house; · cause cracks or damage over me; · affect foundations, paths, fences or retaining walls; · cause noise and vibration day and night; · disturb sleep and the peaceful use of my home; · make it hard to prove where any future damage came from; · reduce the enjoyment and value of my property. I do not think noise rules on their own are enough. Vibra on is different and should be looked at separately. Refer to original submission for more information	Noise rules alone are seen as insufficient; vibration requires separate consideration.

Alan Salter

Submitter 257

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS257.1	Proposed Plan Change No. 81 > Maps > Area Maps > 12 - Proposed PC81 - Area - Moutere, Stringer Rd	Oppose	Canel the proposal to connect Redmill and stringer roads.	I oppose a road connecting Stringer Road and Redmill Road. I suppoer a walking path or cycleway. I oppose the road because of the increase of traffic, saftey of the children and walkers. I live in this neighborhood because it is quiet and relatively traffic free. The road is also entirly not needed as State Highway 60 serves the area well.	**Summary of Submission:** The submitter opposes the proposal to connect Redmill and Stringer Roads. They request cancellation of the road connection. They support a walking or cycling path instead. Concerns include increased traffic, child and pedestrian safety, and loss of neighborhood quietness. They consider the new road unnecessary, as State Highway 60 adequately serves the area.

Tim Kelly

Submitter 259

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS259.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Those elements of PC81 as they relate to enabling additional development in the Māpua area should not proceed until such time as the potential transportation effects are assessed (with appropriate mitigation identified). This would allow the existing and future community to be confident, not only that the local road network will be able to operate in a manner that is both safe and efficient, but also that costs associated with necessary upgrade works are correctly apportioned against development.	Refer to original submission for more information	The submitter opposes elements of PC81 that enable more development in Māpua. They want transportation effects to be assessed first, with mitigation identified. This ensures the road network remains safe and efficient. They also seek fair cost-sharing for necessary upgrades. Further details are in their original submission.

Courtney James

Submitter 260

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS260.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 33 - Proposed PC81 - Zone - Mapua, Cnr Aranui Rd - Tahi St	Oppose	I wish to submit my opposition to Proposed Plan Change 81, particularly the proposed urban development and rezoning affecting the Aranui Road and Tahi Street area of Māpua.	I am particularly concerned about the effects that development in the Aranui Road and Tahi Street area would have on existing residents. These concerns include: ● The loss of Māpua's distinctive village atmosphere and coastal character. ● Increased housing density that is out of keeping with the existing neighbourhood. ● Reduced privacy, outlook and amenity for neighbouring properties. ● Increased traffic on Aranui Road, Tahi Street and nearby roads, creating additional safety concerns for pedestrians, cyclists and children using the area. ● Increased demand on existing infrastructure, including roads,	**Submission Opposes Proposed Plan Change 81** The submitter opposes urban development and rezoning near Aranui Road and Tahi Street, Māpua. Concerns include: • Loss of Māpua's village feel and coastal character. • Higher housing density clashing with the neighbourhood. • Reduced privacy and amenity for neighbors. • Increased traffic and safety risks for pedestrians and children. • Greater strain on infrastructure and community facilities. • Loss of green spaces vital to Māpua's identity.

				stormwater, wastewater, water supply and community facilities. ● The gradual loss of open green spaces that contribute to M āpua's identity and provide an attractive environment for residents and visitors alike. ● Increased noise, construction activity and general urbanisation of what has traditionally been a quiet residential area. Refer to original submission for more information	• Noise, construction, and urbanisation in a quiet area.

Jan Heijs, Member of the public capacity

Submitter 261

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS261.1	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Review growth forecasts, undertake independent peer review, provide a complete regional capacity assessment, remove Māpua as an urban growth area or substantially reduce growth allocated to Māpua. Zoning for almost double the number of dwellings compared to what is needed is excessive and not justified. If the 30 year time horizon is accepted, I recommend that strong staging mechanisms are used to cap and release new greenfield development areas. There is no mention of the rural development additional capacity, there is no quantified assessment of existing and future capacity. I submit that there is inadequate information available to capacity needs without a whole of council overview of existing and future population and dwellings including rural areas. The growth in these areas is significant and can have a significant impact on remaining capacity required in the growth areas proposed by PC81. A complete region-wide capacity reconciliation is required. A region-wide overview of existing and future population and dwelling numbers by areas, and how these contribute to the total is missing. This makes it impossible to assess the proposals /	Growth has slowed, affordability constraints are significant, rural capacity has not been fully considered, and Māpua's growth allocation is not adequately justified. The last few decades including the last few years, many new properties have been established in the rural area, including rural residential (lifestyle blocks). These rural sites contribute to housing choice and housing capacity. There is still a lot of development activity going on across the region creating new rural and rural residential properties. The capacity created by these developments contributes to meeting the regional growth demands. There is no mention of this additional capacity, there is no quantified assessment of existing and future capacity. I submit that there is inadequate information available to capacity needs without a whole of council overview of existing and future population and dwellings including rural areas. The growth in these areas is significant and can have a significant impact on remaining capacity required in the growth areas proposed by PC81. A complete region-wide capacity reconciliation is required. A region-wide overview of	Questions the growth forecasts underpinning PC81, considers growth demand overstated and regional capacity inadequately assessed. Opposes the scale of growth allocated to Māpua and considers the proposed capacity significantly exceeds demonstrated demand. PC81 proposes a 30-year time horizon, while other areas in PC81 use a 10-year horizon. I cannot see that the logic presented only applies for Māpua. The total 30-year capacity need in Māpua (using bottom line) is 634 dwellings (see: Table 2, shaded). The gross proposed capacity in Māpua is 1262 dwellings (see Table 3). There is an apparent surplus of 628 dwellings above the bottom line (1,262 − 634 = 628) planned for the 30-year horizon. There is already a safety margin built into the bottom-line approach. Zoning for almost double the number of dwellings compared to what is needed is excessive and not justified The last few decades including the last few years, many new properties have been established in the rural area, including rural residential (lifestyle blocks). These rural sites contribute to housing choice and housing capacity. There is still a lot of development activity

			allocations. I recommend that the additional (latent) capacity in rural areas, in fact all areas not included in the growth capacity calculations are provided by council and that this capacity is subtracted from the recommended capacity underpinning PC81. Subsequently a review of the greenfield areas required should be reviewed. I question and do not support that Māpua is identified as a "Urban growth Area", and if that is not accepted by the Hearing Committee that the scope of proposed developments in Mapua is reduced to match the bottom-line requirement and that before any elevated land in Māpua (Seaton Valley area) is rezoned a climate adaption plan is adopted.	existing and future population and dwelling numbers by areas, and how these contribute to the total is missing. This makes it impossible to assess the proposals / allocations. I recommend that the additional (latent) capacity in rural areas, in fact all areas not included in the growth capacity calculations are provided by council and that this capacity is subtracted from the recommended capacity underpinning PC81. Subsequently a review of the greenfield areas required should be reviewed. PC81 proposes a 30-year time horizon, while other areas in PC81 use a 10-year horizon. I cannot see that the logic presented only applies for Māpua.	going on across the region creating new rural and rural residential properties. The capacity created by these developments contributes to meeting the regional growth demands. There is no mention of this additional capacity, there is no quantified assessment of existing and future capacity. I submit that there is inadequate information available to capacity needs without a whole of council overview of existing and future population and dwellings including rural areas. The growth in these areas is significant and can have a significant impact on remaining capacity required in the growth areas proposed by PC81. A complete region-wide capacity reconciliation is required. A region-wide overview of existing and future population and dwelling numbers by areas, and how these contribute to the total is missing. This makes it impossible to assess the proposals / allocations. I recommend that the additional (latent) capacity in rural areas, in fact all areas not included in the growth capacity calculations are provided by council and that this capacity is subtracted from the recommended capacity underpinning PC81. Subsequently a review of the greenfield areas required should be reviewed.
OS261.2	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Strengthen deferral triggers, require demonstrated demand and infrastructure readiness, and defer Seaton Valley growth areas until a climate adaptation plan is developed and accepted by the community and any demands for land area to accommodate a potential retreat is clarified and a process is provided by which members of the local community can choose to move there. Maybe a 'hold' on these areas (not developable) is a correct response rather than creating an expectation for greenfield development amongst the current development community. I propose to add to the following criteria for unlocking (remove deferral). I recommend adding a number of additional triggers: a. Confirmed short-term demand for additional capacity (do we need this area now?) • There is no information on funding and timing to provide the	Growth should occur only when needed and after adaptation planning has identified future retreat requirements and land needs	Supports deferred zoning but considers additional growth areas should not be released until demand, infrastructure, environmental and climate adaptation requirements are demonstrated. Opposes development of Seaton Valley areas before a community-supported climate adaptation plan is completed. Since November 2022, councils have been legally required to "have regard to" the Government's National Adaptation Plan when preparing or changing regional policy statements, regional plans and district plans. While the National Adaptation Plan (NAP) does not generally say that councils are legally required to consult communities when preparing adaptation plans, it very clearly expects adaptation planning to be

			infrastructure capacity that triggered a deferral. Timing in LTP's is always fluid and typically follows a separate (LGA) decision process • What if a developer offers to put in the required capacity to unlock a development area at his costs? Is there a case to refuse the proposed upgrade or the development for other reasons (see below)? • This can cause misalignments between the timing for providing for the need for growth and the timing of the completions of the infrastructure upgrade what would unlock a development • Council recognised that the deferral mechanism is justified to avoid all the land identified in PC81 is made available from the start. • I submit that the actual need to release land for development is used as an additional trigger to lift deferral and is based on short term (I suggest 5 year) need for additional capacity for a specific site, confirmed by council based on updated growth forecasts. This should include a mechanism that prioritizes infill before greenfield. (see section ###) b. First priority (in Māpua) for demand triggered by retreat caused by sea level rise • For greenfield areas in Māpua in the Seaton Valley area, a confirmed climate adaptation scenario, where the need for the greenfield areas in higher area such as in Seaton Valley is confirmed and quantified. This also needs a mechanism where Māpua residents will get the first right of refusal to these areas. (see sea level rise discussion in section E.5) c. Complying wastewater network performance (zero overflows). • The TRMP does not allow wastewater network overflows TRMP 36.2.4 • Capacity constraints in the wastewater network in the PC81 process have only assessed the adequacy of the trunk sewer system and did not look at the capacity of the local networks in any detail. Typical design parameters were used to undertake these assessments – not actual performance (see my expert submission as discussed in. • There is no evidence that this TRMP requirement has been used in applications for new developments. • To comply with the TRMP requirements of zero overflows - TRMP 36.2.4 an additional trigger is recommended to lift a deferral status to include the need to achieve zero wet-weather overflow frequency in the networks provided for the development as well as in the networks downstream of the proposed developments (see my expertsubmission as discussed in A.2.1). I note that this section in the		community-centered and developed in partnership with affected communities. In Coastal Management Project work programme, TDC states that "Future work will be delivered through targeted community adaptation planning and will consider specific options at the local level around Tasman". Plan Change 81 addresses housing needs over the next 10 to 30 years. Seaton Valley land will be fully developed under PC81 before residents in low areas need to move. There is no quantification of the capacity required to accommodate the managed retreat option. There is therefore no assessment possible whether or not the capacity claimed to be needed to accommodate this deferral in the Seaton Valley area is adequate or not. There is a clear timing problem between PC81 using a 10-30 years' timeframe and the need for developable land for a sea level rise need for retreat in 50-plus years.

			TRMP is not shown in the PC81 text. d. The need for comprehensive stormwater catchment plans • To fully understand the impact on runoff (quantity and quality) before and after development and to identify mitigation options (not just stormwater treatment devices such as wetlands) it is important that compressive catchment plans are developed assessing pre and post development options from the start of the planning process. (see my expert submission as discussed in A.2.1) • That the lack of catchment plans that meet the requirements is used as a reason for deferral.		
OS261.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Strengthen mechanisms and incentives that encourage intensification before release of additional greenfield land. Council needs to incentivise the uptake of intensification using the planning framework under PC81 and other tools the council has under the LGA. There is no evidence that PC81 incentives/sequencing will make infill commercially competitive. I recommend that council reports back on mechanism under the RMA and LGA by which this increase in uptake can and will be achieved, including by researching mechanisms that worked elsewhere in New Zealand and Overseas. • For example, I know that in Portland (USA), developers were allowed 'more development yield' such as more stories if they achieved certain outcomes that could not be required in different ways. I also recommend that the report is independently reviewed because it seems that Council has struggled with this problem. Based on the report back, more changes in PC81 to incentivise intensification should be included. See full submission for full details.	Developers are likely to continue favouring greenfield development unless stronger incentives are provided. Intensification is known to be harder / more difficult to implement and the development industry is naturally and traditionally gravitating towards greenfield development. Council needs to reverse this behavior and incentivise the uptake of intensification using the planning framework under PC81 and other tools the council has under the LGA. There are several policies and objectives that talk about intensification (e.g. Objective 6.4A.2.2, Policy 6.4A.3.5, Policy 6.4A.3.6, Policy 6.4A.3.7, Policy 6.4A.3.8(b), and Policies 6.4A.3.12 - 6.4A.3.14), which give developers a clear financial advantage and/or a regulatory requirement for intensification over development, such as: • lower contributions • faster consenting • reduced requirements • fee rebates greenfield development consent • infrastructure subsidies • priority access to servicing • delayed release of greenfield land until infill targets are met. There is no evidence that PC81 incentives/sequencing will make infill commercially competitive. PC81 enables intensification but does not materially incentivise or prioritise its delivery over greenfield development. The big risk is that the uptake of intensification will be low or disappointing as it has been in the past: no real change in uptake. I recommend that council reports back on mechanism under the RMA and LGA by which this increase in uptake can and will be	Supports intensification but considers PC81 does not sufficiently incentivise or prioritise infill and medium-density development ahead of greenfield expansion. Intensification is known to be harder / more difficult to implement and the development industry is naturally and traditionally gravitating towards greenfield development. Council needs to reverse this behavior and incentivise the uptake of intensification using the planning framework under PC81 and other tools the council has under the LGA. There are several policies and objectives that talk about intensification (e.g. Objective 6.4A.2.2, Policy 6.4A.3.5, Policy 6.4A.3.6, Policy 6.4A.3.7, Policy 6.4A.3.8(b), and Policies 6.4A.3.12 - 6.4A.3.14), which give developers a clear financial advantage and/or a regulatory requirement for intensification over development, such as: • lower contributions • faster consenting • reduced requirements • fee rebates greenfield development consent • infrastructure subsidies • priority access to servicing • delayed release of greenfield land until infill targets are met. There is no evidence that PC81 incentives/sequencing will make infill commercially competitive. PC81 enables intensification but does not materially incentivise or prioritise its delivery over greenfield development. The big risk is that the uptake of intensification will be low or disappointing as it has been in the past: no real change in uptake. I recommend that council reports back on mechanism under the RMA

				achieved, including by researching mechanisms that worked elsewhere in New Zealand and Overseas. • For example, I know that in Portland (USA), developers were allowed 'more development yield' such as more stories if they achieved certain outcomes that could not be required in different ways. I also recommend that the report is independently reviewed because it seems that Council has struggled with this problem. Based on the report back, more changes in PC81 to incentivise intensification should be included. See full submission for full details.	and LGA by which this increase in uptake can and will be achieved, including by researching mechanisms that worked elsewhere in New Zealand and Overseas. • For example, I know that in Portland (USA), developers were allowed 'more development yield' such as more stories if they achieved certain outcomes that could not be required in different ways. I also recommend that the report is independently reviewed because it seems that Council has struggled with this problem. Based on the report back, more changes in PC81 to incentivise intensification should be included. See full submission for full details.
OS261.4	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Strengthen urban design provisions, require or incentivise 1-2 bedroom dwellings, require higher-quality streetscape outcomes, and recommend that PC81 is reviewed by an independent urban design expert, who has a track record in developing successful medium density developments and infill developments. Looking overseas for this person is suggested. Suggested improvements to PC81 Medium Density housing: • Add objectives, policies and rules that explicitly require delivery of one- and two bedroom dwellings, rather than relying only on density, lot size or attached housing typologies. • For comprehensive developments of ten or more dwellings, require an evidence based minimum proportion of one- and two-bedroom homes, subject to an alternative mix supported by credible local housing-demand evidence. • Require Council monitoring and public reporting of new dwellings by bedroom count, dwelling type and tenure so that the effectiveness of PC81 in meeting smaller household demand can be assessed. • Retain the design matrix but introduce mandatory gateway outcomes that cannot be offset by points gained elsewhere. • Be more restrictive in allowing rear-site developments, only when site-layout leaves no alternatives and if allowed, introduce a separate rear-site and internal-lane matrix. Enable rear housing where it creates a safe, legible, landscaped and pedestrian priority residential environment. • Apply visible variation requirements to both attached and detached developments of four or more dwellings or	Better design controls are needed to achieve quality medium-density development and address unmet demand for smaller housing options.	Supports medium-density housing but considers PC81 does not adequately secure high-quality urban design, delivery of smaller dwellings, green infrastructure, water-sensitive urban design and attractive public streetscapes. The section 32 report only talks about streets in the context of Urban design, housing choice, connectivity, walkability. The section 32 report does not talk about street trees, Low Impact Design (bioretention), linear parks, street canopy or green streets in general and their contribution to physical and mental health. In other words, there is no discussion in the Section 32 report about what the public street should look like and how it should function. It is great to see that there are a few policies in PC81 that provide some direction to the design of streets although they don't include all of the attributes mentioned above (e.g. Policy 6.1.3.1 (f), Policy 6.1.3.1 (g), Policy 6.1.3.1 (h) and Policy 6.1.3.1A). There are no specific requirements that give effect to these policies. Although PC81 contains policies supporting good urban design, there is little explicit direction regarding the design of streets and public spaces. In particular, there is very limited recognition of green streets, street tree canopy, the to provide for Low Impact Design features (e.g. rain gardens) or integrated green infrastructure, despite these now being regarded as contemporary best practice for resilient urban neighborhoods.

			lots. • Introduce Māpua-specific provisions addressing dwelling and lot-size diversity, building form, roof profiles, spacing, garages, landscape, viewshafts and village-scale character. • Require subdivision applications creating four or more residential lots to include an integrated housing, green streetscape, landscape, movement and WSUD concept plan. • Require independent urban-design review for large, prominent or unusual developments. • Treat retirement housing as integrated residential development. Avoid special provisions that enable gated superblocks, impermeable boundaries, disconnected streets or inward-looking development. • Require retirement developments to provide public street and walking connections, active edges and integration with centres, public transport, parks and community facilities. • Introduce a highly permissive co-housing pathway allowing shared facilities, clustered dwellings, communal open space, reduced duplicated parking and flexible internal setbacks. • Ensure the co-housing pathway is available to multi-generational communities and is not limited to older people. • Require sufficient land and street width for a green streetscape and water Sensitive Design (or LID), including rain gardens, wetlands, detention, overland flow paths, tree soil volumes and connected blue-green networks. • Add monitoring provisions requiring Council to audit completed developments and report whether the rules are delivering the anticipated housing, social, landscape and stormwater outcomes. In addition, please also consider the submissions of Nelson Tasman 2050 to the draft FDS (see app.1) and the draft Māpua Masterplan (app.2) on the issue of quality development. Although this section focused on the medium density required, many of the points raised will also apply to intensification. It is recommended to require streets within new greenfield developments and major redevelopment areas to incorporate street trees, LID features (such as rain gardens), reduced impervious surfaces, and other green infrastructure that improves amenity, biodiversity,		

			positive effects on physical and mental health, climate resilience and stormwater management. Requirements should include: • ecological street design • minimum street tree planting; • green streets; • rain gardens or bioretention within streets; • maximum road pavement widths; (considerations of and permission to use shared spaces) • minimum street canopy; • street cross-sections with green infrastructure; • boulevard planting; • etc. Central to this part of the submission is that the Medium Density Development requirements are to be accepted only subject to the amendments suggested above, or other amendments having equivalent effect, so that increased housing capacity is accompanied by enforceable requirements for good-quality homes, connected neighbourhoods, social inclusion and water-sensitive urban development.		
OS261.5	Proposed Plan Change No. 81 > Maps > Zone Maps	Oppose	Include Lower Māpua within PC81, enable mixed-use development around the village centre and wharf area, and support climate-resilient redevelopment. I recommend that the lower levels of Mãpua that are now left out are included in PC81 showing a. Zoning to allow for mixed use, in the village center and near the Wharf into. Mixed use being commercial at the ground floor and residential, 1–2-bedroom homes in the levels above. b. That these (re)developments need to meet flood climate proof conditions (elevated floor levels, ground floors able to be sealed at high water levels) c. See Figure 6 (within full submission) for locations. These locations have already a 'commercial' or 'operative' zoning. d. For the remainder of the low-lying areas, I suggest keeping to current zoning but as and when redevelopment under existing use rights is requested (possibly needed in the next 50-100 year) provide additional rules to also make these properties more climate proof.	To maintain village character, support housing choice and ensure existing parts of Māpua remain viable and resilient.	Considers Lower Māpua and the existing village centre have been largely excluded from future planning and should play a greater role in accommodating housing and mixed-use development.

OS261.6	Proposed Plan Change No. 81	Not Stated	The observation that most of the growth will be driven by net-migration (HBA24, 2.4.4) should prompt a reduction in forecasted demand, (1) because Tasman has become one of the most unaffordable regions and (2) because the type of new houses on offer will change to smaller, including 1-2 bedroom dwellings (one of the key objectives of PC81) and will attract less, typically more wealthy people from outside the region. Update the 10- and 30-year demand forecasts to reflect the change in demand. The growth forecasts are to be peer reviewed by an independent expert who has access to the submission provided on this topic. Any changes in demand forecasts should prompt a review of the capacity needed for the 10-and 30-years planning horizons used for PC81. A region-wide overview of existing and future populations and dwelling numbers by area, and how these contribute to the total is missing. This makes it impossible to assess the proposals / allocations. It is unclear how the allocation of growth across the region has been undertaken (in the HBA21 and HBA24). This has not been explained. Refer to full submission for full details and to see relevant attachments and NZ Stat graphs.	NZ Stats predictions are much lower compared to the predictions used in HBA24. The fact that in the past NZ Stats were found to be underpredicted in the past can't be used as the reason to assume that their predictions for the future remain too low. The 2021 HBA concluded that the region has grown much more than was forecast, primarily through internal migration, and jumped to the conclusion that this trend will continue: "Most of the overall population growth will be driven by net migration gains, new residents moving into this region. It appears that the internal migration-driven growth that our region has experienced over the last decade may for a large part have been the result of relaxed immigration settings and failing housing policies in other parts of the country". I suggest that this logic has changed dramatically based on observations in the following sections. Most of the statistics used in HBA24 are based on observations that are a few years old. The recent economic downturn (over the last 2 years) and the cost-of-living crisis have not been factored in The observation that most of the growth will be driven by net-migration (HBA24, 2.4.4) should prompt a reduction in forecasted demand, (1) because Tasman has become one of the most unaffordable regions and (2) because the type of new houses on offer will change to smaller, including 1-2 bedroom dwellings (one of the key objectives of PC81) and will attract less, typically more wealthy people from outside the region. Council has largely used the same consultants and the same staff resources to undertake the growth forecasts. It is highly unlikely that these will alter their opinion that has developed over many years. An independent review would be in order I submit that the 10- and 30-year demand forecasts are to be updated to reflect the change in demand partly in response to my observations above And I submit that the growth forecasts are to be peer reviewed by an independent expert who has also access to the submission provided on this topic.	NZ Stats predictions are much lower compared to the predictions used in HBA24. The fact that in the past NZ Stats were found to be underpredicted in the past can't be used as the reason to assume that their predictions for the future remain too low. 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An independent review would be in order I submit that the 10- and 30-year demand forecasts are to be updated to reflect the change in demand partly in response to my observations above And I submit that the growth forecasts are to be peer reviewed by an independent expert who has also access to the submission provided on this topic.

				Any changes in demand forecasts should prompt a review of the capacity needed for the 10- and 30-years planning horizons used for PC81 A region-wide overview of existing and future population and dwelling numbers by areas, and how these contribute to the total is missing. This makes it impossible to assess the proposals / allocations. Refer to full submission for full details.	Any changes in demand forecasts should prompt a review of the capacity needed for the 10- and 30-years planning horizons used for PC81 A region-wide overview of existing and future population and dwelling numbers by areas, and how these contribute to the total is missing. This makes it impossible to assess the proposals / allocations. I haven't found an economic assessment backing the proposed development. Long-term consequences such as operation and maintenance of the 'sprawled' infrastructure have not been considered. Refer to full submission for full details.
OS261.7	Proposed Plan Change No. 81	Amend	I submit that Māpua should be removed from the list of 'Urban growth Areas". The Council should be able to demonstrate, through its evidence base and section 32 evaluation, why concentrating a lot of growth in Māpua best achieves the NPS-UD objectives—particularly the creation of a well-functioning urban environment, efficient infrastructure use, accessibility, resilience, and sufficient development capacity across the Nelson–Tasman urban environment as a whole. Because of the financial implications, it is questionable whether the FDS and consequently the scope of PC81 would still be supported by the newly elected councilors.	The Joint Committee of the Nelson City and Tasman District Councils resolved on 10 November 2020 that the Nelson Tasman urban environment comprises the following city and towns: Nelson, Richmond, Motueka, Māpua, Wakefield, Brightwater, Cable Bay and Hira, in recognition that these communities are part of the same labor and housing market, and these areas are or are intended to be predominantly urban in character. (HBA24, s2.2) One of the criteria in the NPS-UD, objective 1 to identify 'well-functioning urban environments' are being "well connected" and "Have good accessibility". Māpua clearly fails this test as it is more than 15 km to commute to Richmond or Motueka, there is very limited public transport and no options for cycling connections for daily commuting. Cable Bay and Hira have since been removed from the list indicating that changes in this allocation are possible. TDC has never shown any willingness to reconsider this allocation for Māpua. The status of allocating Māpua as 'Urban growth Areas' was poorly justified. similar for Hira and Cable Bay. This lack of logic is illustrated by the relatively low increase in demand in Motueka, an employment center with a known housing shortage: the HBA's growth predictions attribute by far the lowest growth rate to this town. Although the reason given in the s32 report is risk of flooding in Motueka, the option to move to higher grounds could have been chosen, a similar justification that now is used for greenfield development in Māpua.	The Joint Committee of the Nelson City and Tasman District Councils resolved on 10 November 2020 that the Nelson Tasman urban environment comprises the following city and towns: Nelson, Richmond, Motueka, Māpua, Wakefield, Brightwater, Cable Bay and Hira, in recognition that these communities are part of the same labor and housing market, and these areas are or are intended to be predominantly urban in character. (HBA24, s2.2) One of the criteria in the NPS-UD, objective 1 to identify 'well-functioning urban environments' are being "well connected" and "Have good accessibility". Māpua clearly fails this test as it is more than 15 km to commute to Richmond or Motueka, there is very limited public transport and no options for cycling connections for daily commuting. Cable Bay and Hira have since been removed from the list indicating that changes in this allocation are possible. TDC has never shown any willingness to reconsider this allocation for Māpua. The status of allocating Māpua as 'Urban growth Areas' was poorly justified. similar for Hira and Cable Bay. NPS-UD defines an urban environment as: "...any area of land (regardless of size, and irrespective of local authority or statistical boundaries) that: a. is, or is intended to be, predominantly urban in character; and b. is, or is intended to be, part of a housing and labor market of at least 10,000 people". Mapua is a small seaside village. TDC has confirmed that the village character is to be retained but at the same time wants Mapua to be an 'Urban Growth Centre". These two objectives, certainly not as is

				the amount of new greenfield developments in Māpua will cause more traffic, will call for roading upgrades, will need many people to travel to Motueka, Richmond and Nelson for work, education and services, cause environmental effects including greenhouse gas emissions, and cause higher council rates. Aiming for the proposed additional capacity in Māpua also conflicts with the objective of preserving the village's character. It seems that the Tasman District Council (TDC) aims for Māpua to become a suburb of Richmond and a wealthy seaside town (not village). Is the proposed growth in Māpua consistent with the NPS-UD objectives for natural hazards and climate resilience? The answer is clearly NO. Greenfield growth generally produces more greenhouse gas emissions than intensification within existing urban areas, because it requires more roads, larger infrastructure networks, and often larger buildings that use more materials, heating, and cooling. In addition, because Māpua is some distance from employment, education, and services, greenfield development there would also increase travel demand. During development of the FDS, TDC responded to this concern by suggesting that, in 50 years, everyone would be driving electric vehicles and therefore climate-change effects would be negligible. That response overlooks the broader greenhouse gas impacts of greenfield growth. For further detail, I refer to the Nelson Tasman 2050 submission on the FDS (App.1), which forms part of this submission. I submit that Māpua should be removed from the list of 'Urban growth Areas". Refer to full submission for full details.	proposed in the FDS and PC8, cannot be met at the same time. The proposed expansion of Māpua fails the test of meeting item (a) quoted above. This lack of logic is illustrated by the relatively low increase in demand in Motueka, an employment center with a known housing shortage: the HBA's growth predictions attribute by far the lowest growth rate to this town. Although the reason given in the s32 report is risk of flooding in Motueka, the option to move to higher grounds could have been chosen, a similar justification that now is used for greenfield development in Māpua. the amount of new greenfield developments in Māpua will cause more traffic, will call for roading upgrades, will need many people to travel to Motueka, Richmond and Nelson for work, education and services, cause environmental effects including greenhouse gas emissions, and cause higher council rates. Aiming for the proposed additional capacity in Māpua also conflicts with the objective of preserving the village's character. It seems that the Tasman District Council (TDC) aims for Māpua to become a suburb of Richmond and a wealthy seaside town (not village). I submit that Māpua should be removed from the list of 'Urban growth Areas". Because of the financial implications, it is questionable whether the FDS and consequently the scope of PC81 would still be supported by the newly elected councilors. If the proposed additional in Māpua would match the bottom-line requirements (the current proposal doubles the capacity compared to what is needed, see E.6) the infrastructure upgrade implications and the capital investments would probably be much less. Is the proposed growth in Māpua consistent with the NPS-UD objectives for natural hazards and climate resilience? The answer is clearly NO. Greenfield growth generally produces more greenhouse gas emissions than intensification within existing urban areas, because it requires more roads, larger infrastructure networks, and often larger buildings that use more materials, heating, and cooling. In addition, because Māpua is some distance from employment, education, and services, greenfield development there would also increase travel demand. During development of the FDS, TDC responded to this concern by suggesting that, in 50 years, everyone would

					be driving electric vehicles and therefore climate-change effects would be negligible. That response overlooks the broader greenhouse gas impacts of greenfield growth. For further detail, I refer to the Nelson Tasman 2050 submission on the FDS (App.1), which forms part of this submission. Refer to full submission for full details.
OS261.8	Proposed Plan Change No. 81	Not Stated	This is inconsistent with how a Council Strategy should be used and I submit that every proposed development area needs to be re-justified as part of this process. Just referring to the FDS is not adequate. What is the reason that some council strategies are deemed important and others (e.g. the Urban Stormwater Strategy) are ignored? I submit that PC81 is also checked against and given affect to other relevant Council Strategies including but not limited to: a. The walking and cycling strategy (how will the future expanding Māpua community be able to commute to Richmond and Motueka by bicycle? b. The transport strategy (including consequential upgrades and related costs of local and regional/national roads, and the private costs related to the need to drive longer distances c. The Reserves Strategy (Esplanade reserves, etc.)	When the Future Development Strategy (FDS) was developed, the community was told that the FDS would provide strategic direction in relation to the provision for future growth but that every new development still had to be re-justified through a proper RMA process (Plan Change). This is confirmed in the current FDS for example on page 16 “The plans are illustrative only and site boundaries should not be relied upon, since future planning processes, including changes to the Councils’ Resource Management Plans and more detailed planning processes (e.g. structure planning), will determine the final approach and extent. There will be further opportunities for engagement and refinement of these areas as they progress through these future planning processes.” It appears that in PC81, the FDS is also now presented as a non-negotiable fact. This is inconsistent with how a Council Strategy should be used and I submit that every proposed development area needs to be re-justified as part of this process. Just referring to the FDS is not adequate. It is also worrying that the “Urban Stormwater Strategy” is ignored in the development of PC81. I submit that PC81 is also checked against and given affect to other relevant Council Strategies	When the Future Development Strategy (FDS) was developed, the community was told that the FDS would provide strategic direction in relation to the provision for future growth but that every new development still had to be re-justified through a proper RMA process (Plan Change). This is confirmed in the current FDS for example on page 16 “The plans are illustrative only and site boundaries should not be relied upon, since future planning processes, including changes to the Councils’ Resource Management Plans and more detailed planning processes (e.g. structure planning), will determine the final approach and extent. There will be further opportunities for engagement and refinement of these areas as they progress through these future planning processes.” It appears that in PC81, the FDS is also now presented as a non-negotiable fact. This is inconsistent with how a Council Strategy should be used and I submit that every proposed development area needs to be re-justified as part of this process. Just referring to the FDS is not adequate. It is also worrying that the “Urban Stormwater Strategy” is ignored in the development of PC81. I submit that PC81 is also checked against and given affect to other relevant Council Strategies
OS261.9	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects	Amend	.		

Sarah Glazebrook

Submitter 262

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS262.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues	Amend	That stormwater be written in as a limiting a factor as already there is capacity so no development should be considered until that is addressed	**6.15.1.12 Add stormwater**	Submitters want stormwater included as a limiting factor in planning decisions. They argue current capacity exists, so no new development should proceed until stormwater issues are resolved. This is to be added as clause **6.15.1.12** in the proposal.
OS262.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Amend	Make compulsory reserves as part of subdivision	Add more reserves, they seem to being removed	The submitter wants to **amend the proposal** to make reserves compulsory in subdivisions. They are concerned that reserves are being removed rather than added. The goal is to ensure more reserves are included in development areas.

Habitat for Humanity Nelson Limited

Submitter 263

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS263.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Support	Proceed as proposed.	Habitat for Humanity supports the inclusion of a Medium Density Residential Zone and associated rules. Medium density supports and enables the development of affordable housing that meets the needs of the community.	Submitter supports the proposal and seeks it to proceed as planned. They back the Medium Density Residential Zone and its rules. They believe medium density housing promotes affordable homes that suit community needs.

Jennifer Blackett

Submitter 264

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS264.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd	Oppose	Require further assessment of housing demand and infrastructure capacity before proceeding with proposed residential growth areas.	The submitter considers existing infrastructure and community services to already be under pressure and questions whether sufficient	The submitter supports well-planned growth but questions whether additional residential land is needed given reported availability of existing sections. They are concerned that growth enabled by PC81 may place

				demand exists to justify additional greenfield development.	pressure on healthcare services, emergency services, schools, wastewater infrastructure, and the local transport network.
OS264.2	Proposed Plan Change No. 81 > Maps > Zone Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd	Oppose	Require independent assessments of flooding, stormwater, wastewater, drainage and groundwater effects prior to any development occurring.	Development may increase flood risk, place further demand on already constrained wastewater infrastructure, affect groundwater resources, and adversely impact neighbouring properties.	The submitter states that flooding occurs within the proposed development area and is concerned about the effects of additional buildings, earthworks, hard surfaces, and drainage modifications on flood risk. Concerns are also raised regarding the capacity of the wastewater system and potential impacts on groundwater and private water bores relied upon by neighbouring properties.
OS264.3	Proposed Plan Change No. 81 > Maps > Zone Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd	Oppose	Evaluate alternative locations with lower agricultural value and avoid rezoning productive land unless a strong justification is demonstrated.	Productive land is an important resource for food production and should not be unnecessarily lost to urban development.	The submitter considers the proposed development site to be productive, arable land and questions whether such land should be converted to residential use when alternative sites may exist.
OS264.4	Proposed Plan Change No. 81 > Maps > Zone Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd	Oppose	Remove or reconsider the proposed development area, or require stronger assessment and mitigation of amenity effects on neighbouring properties.	The submitter considers that the proposal would adversely affect the rural environment and reduce the amenity and quality of life currently enjoyed by nearby residents.	The submitter is concerned that a residential subdivision opposite their property would fundamentally change the rural character of the area through increased housing density, traffic, noise, lighting, and loss of privacy.

HortNZ

Submitter 265

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS265.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 40 - Proposed PC81 - Zone - Motueka, Cnr Motueka Valley Hwy - College St	Oppose	Amend PC81 to include stronger and more explicit provisions to manage reverse sensitivity effects, including requirements for setbacks, buffering, acoustic insulation, and policy direction to ensure new development does not adversely affect existing horticultural operations.	To better give effect to the NPS-HPL, which requires territorial authorities to avoid or mitigate reverse sensitivity effects on surrounding primary production activities, and to protect the ongoing operation of productive horticultural land.	HortNZ does not oppose the rezoning of T-17b but is concerned that future residential development could create reverse sensitivity effects on adjoining productive horticultural land, including Highly Productive Land containing LUC 1 and LUC 3 soils. HortNZ considers the current policy framework does not adequately ensure that new residents will not constrain existing horticultural activities.
OS265.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules	Amend	Delete the requirement for a Safe Active Transport Plan, or alternatively limit the requirement to situations where the scale or location of workers' accommodation is likely to generate significant transport safety effects.	The requirement extends beyond managing environmental effects and into workplace management responsibilities. Seasonal workers' accommodation is generally located on or adjacent to the place of employment, reducing travel demand and associated transport effects. Requiring a transport plan for all developments is therefore disproportionate to the likely effects.	HortNZ supports most proposed changes to workers' accommodation provisions, including a more flexible definition, smaller minimum site area, removal of the relocatable building requirement, ability to repurpose existing buildings, and retention of controlled activity status. However, it opposes the requirement for a Safe Active Transport Plan as a standard matter of control.

Fiona Ede

Submitter 266

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS266.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Remove or substantially reduce MDRZ intensification provisions in existing residential suburbs, or apply a lower-density model with reduced building heights and density. Provide for lower-density intensification such as duplexes, terrace housing, secondary dwellings and lower maximum heights (approximately 7-8m).	The submitter considers the proposed level of intensification will result in significant loss of amenity, neighbourhood character, privacy, sunlight, outlook, gardens, habitat, and community cohesion while primarily benefiting developers.	Oppose MDRZ provisions, including 17.1A.3.2 and associated density, height and site development standards. The submitter strongly opposes applying MDRZ provisions across existing suburban areas of Richmond and Tasman. They consider the proposed density (30+ dwellings/ha, with development scenarios showing 60-80 dwellings/ha), 11m building heights, reduced setbacks, and high site coverage to be excessive and incompatible with established neighbourhood character and amenity.
OS266.2	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Require more comprehensive and master-planned medium-density development rather than site-by-site intensification.	The submitter believes piecemeal redevelopment will increase dwelling numbers but will not create high-quality communities or well-functioning urban environments.	The submitter is concerned that redevelopment can occur on individual sites without an integrated neighbourhood approach, creating fragmented and inconsistent urban form.
OS266.3	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules	Oppose	Reduce permitted building heights, increase setbacks, and strengthen privacy and neighbour amenity protections.	The submitter considers the proposed standards insufficient to protect neighbouring residents from adverse effects.	The submitter is concerned that 11m buildings located close to boundaries will increase overlooking, dominance, noise, shading, and loss of privacy for neighbouring properties.
OS266.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.4A Land for Residential Activities	Oppose	Require accessible dwellings and encourage lower-density, family-friendly housing forms.	Proposed development outcomes may not support long-term occupancy, accessibility needs, community cohesion or resident wellbeing.	Questions whether MDRZ housing forms provide suitable living environments for families, older persons and mobility-impaired residents. Accessible housing provisions are not mandatory.
OS266.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.3 Urban Infrastructure Services	Oppose	Undertake further work on infrastructure and stormwater implications and strengthen stormwater management requirements.	Intensification may create significant infrastructure demands and increase flooding risks.	16. Concerns about stormwater runoff, infrastructure capacity, loss of permeable surfaces, climate change resilience and environmental effects of increased site coverage.
OS266.6	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	Review and strengthen the Design Matrix to better address privacy, building dominance, internal amenity and residential quality.	Current provisions may allow poor-quality developments while still achieving compliance.	Considers the Design Matrix places too much emphasis on appearance and streetscape outcomes and insufficient emphasis on occupant wellbeing and neighbour amenity.

Manawhenua ki Mohua

Submitter 267

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary

OS267.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	Retain papakainga provisions as notified.	Throughout the development of PC81 Tasman District Council staff have considered and incorporated advice received from representatives of iwi authorities and other Māori entities located within Tasman District, including Manawhenua ki Mohua. Advice from these parties informed the development of the proposed objectives, policies and rules relating to papakāinga in PC81.	To retain all provisions relating to papakainga as notified.

Te Ātiawa o te Waka-a-Māui Trust

Submitter 268

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS268.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	Retain all papakainga provisions and rezoning of Onetahua Marae as notified.	Throughout the development of PC81 Tasman District Council staff have considered and incorporated advice received from Te Ātiawa through my involvement in the papakainga provisions working group, and other representatives of iwi authorities located within Tasman District. Advice from all of us informed the development of the proposed objectives, policies and rules relating to papakāinga in PC81.	Te Ātiawa o Te Waka-a-Māui Trust supports the papakāinga provisions in PC81, including the rezoning of Onetahua Marae to Papakāinga Zone.
OS268.2	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Amend	Renumber Chapter 10A as an independent chapter	The location of the Papakāinga Development chapter at 10A infers that Papakāinga Development is a subset of Chapter 10: Significant Natural Values and Historic Heritage. However, the papakāinga provisions are a development framework quite separate to significant natural values and historic heritage, and therefore should sit alongside other standalone chapters. Independent numbering will make the plan easier to interpret and avoid confusion when citing provisions.	Te Ātiawa o Te Waka-a-Māui Trust seeks to renumber Chapter 10A as an independent chapter as papakainga provisions are separate to significant natural values and historic heritage.

Onetahua Marae

Submitter 269

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS269.1	Proposed Plan Change No. 81 > Chapter 10A: Papakainga Development	Support	Retain all papakainga provisions as notified and retain the rezoning of Onetahua Marae.	The proposed papakāinga provisions in PC81 will support existing marae functions, enable future housing opportunities throughout Mohua / Golden Bay, reflect the aspirations of mana whenua iwi, hapū and whānau, and provide planning certainty.	Onetahua Marae supports the papakāinga provisions in Plan Change 81 (PC81) including all papakāinga objectives, policies and rules Rezone Onetahua Marae to Papakāinga Zone

Mohua Ventures

Submitter 270

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS270.1	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.12: Outline Spatial Plan - Rototai Road	Amend	Amend Schedule 16.3D.12 (OSP) to: remove the Stormwater Management Area from our site; or clarify that the location shown is indicative only and that alternative stormwater management solutions may be approved where they achieve the same or better stormwater, environmental and urban design outcomes.	As a comprehensive residential development, Mohua Ventures integrates stormwater management with open space, landscaping, biodiversity and community amenity. This integrated approach is consistent with contemporary water-sensitive urban design principles and should not be unnecessarily constrained by a prescriptive spatial overlay where the desired outcome can be achieved through alternative design solutions.	Submitters seek to amend Schedule 16.3D.12 (OSP) by either removing the Stormwater Management Area from their site or clarifying it as indicative only. They want flexibility for alternative stormwater solutions that meet or exceed current environmental and design outcomes. They argue their integrated approach combines stormwater management with open space, biodiversity, and community benefits, aligning with modern water-sensitive urban design principles.

Adam Hills

Submitter 271

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS271.1	Proposed Plan Change No. 81 > Chapter 17: Zone Rules > 17.1A Medium Density Residential Zone Rules > 17.1A.3 Building Construction or Alteration	Oppose	**Decision / Relief Sought from Council** I request that the Council make the following decision/amendments: • **Re-evaluate MDRZ Provisions in Richmond:** Reduce allowable building heights and increase setback/recession plane rules to better protect neighborhood privacy, sunlight, and residential character. • **Focus on Managed Greenfield Expansion & Sensitive Infill:** Shift the focus of meeting housing demand toward well-planned greenfield development or lower-impact infill options rather than broad medium-density zoning across existing residential areas. • **Incorporate Stricter Local Design Controls:** Ensure any permitted multi-unit developments undergo appropriate design checks to protect streetscapes and ensure developments fit the scale of a regional town.	I **oppose** the extent and scale of the proposed urban intensification and Medium Density Residential Zoning rules for Richmond. **Reasons for Submission:** • **Incompatibility with Small-Town Character:** Richmond is a regional township with a distinct community feel, low-rise residential character, and strong connections to surrounding open space. Applying urban intensification models originally designed for major metropolitan cities fails to respect the local environment and the lifestyle expectations of Richmond residents. • **Scale and Liveability:** High-density, multi-storey developments do not reflect how local families and residents choose to live in our district. Over-intensification risks overwhelming suburban streets, reducing privacy and sunlight for neighboring properties, and placing strain on local infrastructure and parking. • **One-Size-Fits-All Approach:** While providing housing capacity is important, it should not come at the expense of Richmond's established suburban amenity. Intensification rules should be tailored specifically to Richmond's scale rather than adopting broad metropolitan standards.	The submitter opposes the proposed Medium Density Residential Zoning (MDRZ) in Richmond. They seek reduced building heights, increased setbacks, and stricter design controls to protect privacy, sunlight, and the town's character. They prefer managed greenfield growth and sensitive infill over broad intensification across existing neighborhoods. Concerns include loss of Richmond's small-town feel, impacts on liveability, and inappropriate metropolitan-style rules for the area.

Lynley Worsley

Submitter 272

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS272.1	Proposed Plan Change No. 81 > Chapter 5: Site Amenity Effects > 5.2 Amenity Values > 5.2.3 Policies	Oppose	Remove the addition to 5.2.3.2	5.2.3.2 I opppse the addition to this clause. We are all being encouraged to go solar as well as take advantage of passive heating. Setting up a situation where homes receive less sunlight when a neighbour varies their building(s) is contradictory to this.	**Summary of Submission:** The submitter opposes the proposed addition to clause 5.2.3.2. They seek removal of this addition. Their concern is that the change may reduce sunlight to homes. This contradicts efforts to encourage solar energy use and passive heating.
OS272.2	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.1 Issues	Amend	6.15.1.3A My recommendation is that Council look into how the choices mentioned above were made and how the situation may be addressed responsibly and legally, what councils in other regions have implemented etc 6.15.1.10 I would expect this 'earlier planning' to be reviewed before Plan Change 81 is adopted given the latest correspondence to council from Minister Simon Watts re IPCC's SSP5-8.5 and its predecessor RCP8.5 ie *"Recent international assessments indicate that SSP5-8.5 and its predecessor RCP8.5 are best regarded as less likely, high-impact emissions scenarios that are useful for stress testing and contingency planning. They should not automatically be treated as the central or most likely future when making decisions that affect infrastructure investment, land use, property rights, or rates.* *New Zealand faces significant infrastructure challenges. Every dollar spent on resilience measures is a dollar that cannot be spent on fixing roads, upgrading water infrastructure, improving community facilities, or reducing pressure on rates. Councils must therefore ensure climate-related decisions are proportionate, evidence-based, and represent value for money.*	6.15.1.3A There is no mention of the very obvious need for introducing varying temporary or relocateable housing options. The number of folk currently living in buses, caravans and tiny homes strongly suggests that this is a popular housing option for a significant number of people in our region. Why is this housing component not included? The assumption that everyone wants to live in a traditional house is questionable 6.15.1.10 Extract from document 37240 1.6 Approach in Māpua (Focused Summary) "Earlier planning for Māpua identifies a long-term growth pattern that is strongly influenced by coastal hazard risks, including sea level rise. In particular, the MMP anticipates a strategic shift of urban development toward higher, more resilient land, with future growth focused on elevated areas to enable the gradual transition of the settlement away from low-lying coastal land over time." I would expect this 'earlier planning' to be reviewed before Plan Change 81 is adopted given the latest correspondence	Submitters seek inclusion of temporary or relocatable housing options, reflecting current community needs beyond traditional homes. They request review of earlier Māpua planning, urging use of varied, evidence-based climate scenarios per Minister Simon Watts' guidance. Emphasis is on proportionate, cost-effective resilience measures, transparent scenario choices, and prioritizing adaptive, staged investments over worst-case assumptions to ensure long-term affordability and infrastructure balance.

			Accordingly, the Government expects councils to: *Use a range of credible climate scenarios when assessing infrastructure and planning decisions, including medium and high-end scenarios.* *Clearly identify which scenario has been adopted as the primary planning assumption and explain why.* *Demonstrate the additional costs associated with higher-end climate assumptions and disclose the impact on rates, debt, and long-term affordability.* *Prioritise adaptive pathways and staged investment approaches wherever practical, rather than defaulting to immediate construction of infrastructure designed solely around worst-case assumptions.6.*	to council from Minister Simon Watts re IPCC's SSP5-8.5 and its predecessor RCP8.5 ie *"Recent international assessments indicate that SSP5-8.5 and its predecessor RCP8.5 are best regarded as less likely, high-impact emissions scenarios that are useful for stress testing and contingency planning. They should not automatically be treated as the central or most likely future when making decisions that affect infrastructure investment, land use, property rights, or rates.* *New Zealand faces significant infrastructure challenges. Every dollar spent on resilience measures is a dollar that cannot be spent on fixing roads, upgrading water infrastructure, improving community facilities, or reducing pressure on rates. Councils must therefore ensure climate-related decisions are proportionate, evidence-based, and represent value for money.* *Accordingly, the Government expects councils to:* *Use a range of credible climate scenarios when assessing infrastructure and planning decisions, including medium and high-end scenarios.* *Clearly identify which scenario has been adopted as the primary planning assumption and explain why.* *Demonstrate the additional costs associated with higher-end climate assumptions and disclose the impact on rates, debt, and long-term affordability.* *Prioritise adaptive pathways and staged investment approaches wherever practical, rather than defaulting to immediate construction of infrastructure designed solely around worst-case assumptions."*	
OS272.3	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.3 Policies	Amend	6.15.3.5 Safe traffic environment - please add 'without reducing parking availability'	6.15.3.5 Consideration to this can't be undertaken without understanding the impact on reserves the Tenths Trust Settlement will have 6.15.3.19 I support this 6.15.3.20 I support this	**Summary of Submission:** The submitter requests amending Decision 6.15.3.5 to ensure a safe traffic environment *without reducing parking availability*. They highlight the need to understand impacts on reserves related to the Tenths Trust Settlement before consideration. The submitter supports Decisions 6.15.3.19 and 6.15.3.20 as proposed.
OS272.4	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Remove 6.15.20.1 and replace it with a rodent trapping plan	6.15.20.1 I have spoken to a number of people who live in an area where cats have been required to stay indoors. The rat and mice population has exploded and the number of eggs hatching reduced	Submitters seek to **remove Rule 6.15.20.1** and replace it with a **rodent trapping plan**. They argue that where cats are confined indoors, rat and mouse populations have increased significantly.

					This rise in rodents has led to a reduction in egg hatching rates. The submission favors active rodent control to protect wildlife.
OS272.5	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay > 6.15.30 Principal Reasons and Explanation	Amend	Remove the reference to the boat ramp as it is misleading	"Māpua wharf and its related historic buildings have redeveloped as a vibrant area for specialist shops and cafes while the adjoining boat ramp provides access to the Māpua Channel." To NOTE the adjoining boat ramp provides very limited access to Mapua Channel	**Submission Summary:** The submitter requests amending the decision to remove the reference to the boat ramp. They argue the current description is misleading. They note the boat ramp provides very limited access to the Māpua Channel, contrary to the statement that it provides access.

Thomas Drach

Submitter 273

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS273.1	Proposed Plan Change No. 81 > Chapter 6: Urban Environment Effects > 6.15 MApua/Ruby Bay	Amend	Suggest expanding the scope of area which can feasibly support Mapua, to include proximal lands adjacent to SH60. Example below: 6.15.1.3BThe need to provide sufficient business and industrial land proximally to Māpua close to where people live where it can support the growth of the Māpua community. If needed, "proximally" could be further refined, such as "within 500-1000m of SH60, between (pt A) and (pt B), but I don't think that is necessary. (in addition to the existing land area known as "Mapua") Please review attached images to assist in your review processes, thank you.	With respect to: 6.15.1.3BThe need to provide sufficient business and industrial land in Māpua close to where people live where it can support the growth of the Māpua community... : with such a shortage of available lands within the currently ascribed boundaries of "Mapua", and the known long-term challenges, it would make sense to consider lands adjacent to SH60 be conceptually included as available to support this stated issue 6.15.1.3B. Every other Town in this Urban Development Area of Tasman District, has either SH6 or SH60 directly thru it! Mapua appears to be the only outlier. As Commercial and Mixed Business Use organically tend to locate adjacent to transport corridors, it seems helpful to perhaps expand the "borders" of Mapua to allow for services along SH60, say Gardner Valley Road to Mapua Drive.	The submitter requests expanding Mapua's business and industrial land to include areas adjacent to SH60. They highlight a shortage of available land within current boundaries. They suggest extending the area to support community growth, noting other towns have key transport corridors. The proposal aims to better align Mapua with transport routes like SH60, potentially from Gardner Valley Road to Mapua Drive.

Crerar A Team Family Trust

Submitter 274

Original Submission No	Provision	Position	Decision Requested	Reasons	Summary
OS274.1	Proposed Plan Change No. 81 > Maps > Zone Maps > 59 - Proposed PC81 - Zone - Takaka, Rototai Rd	Oppose	Oppose and reject the residential rezoning of Rototai land.	The submitter states that the land is highly productive value farmland and is not suitable for residential development. The submitter considers less fertile and more appropriately located land should be used for residential subdivision. The submitter states the site is subject to significant flooding hazards that cannot be satisfactorily mitigated. The submitter states flooding may become more frequent and severe in the future, notes that fill is being imported to parts of the site, and considers any increase in flooding could cause significant damage to surrounding properties. The submitter states that drains in the vicinity of the proposed rezoning are already inadequate and considers that additional building and roading associated with development would increase flooding and associated damage. The submitter states that the property relies on potable bore water from an aquifer and is concerned runoff from future development could pollute or contaminate the existing water supply. The submitter states Rototai Road is too narrow to accommodate additional traffic, that the site is located on a blind corner, and that a serious motor vehicle crash has previously occurred in the area. The submitter considers additional housing would increase the danger.	The submitter opposes the proposed residential rezoning of land at Rototai Road and seeks that the land not be rezoned for residential development. The submitter states that land is productive and is subject to significant flooding hazard. The submitter is concerned that existing drainage infrastructure in the area is inadequate and that development could worsen flooding. The submitter is concerned that development runoff could adversely affect the quality of an existing bore water supply. The submitter is concerned that Rototai Road is unsuitable for additional traffic generated by residential development.
OS274.2	Proposed Plan Change No. 81 > Chapter 16: General Rules > 16.3 Subdivision > Schedules > Schedule 16.3D: Outline Spatial Plans > Schedule 16.3D.12: Outline Spatial Plan - Rototai Road	Oppose	Oppose and reject the residential rezoning of Rototai land.	The submitter states Rototai Road is too narrow to accommodate additional traffic, that the site is located on a blind corner, and that a serious motor vehicle crash has previously occurred in the area. The submitter considers additional housing would increase the danger.	Oppose rezoning. The submitter is concerned that Rototai Road is unsuitable for additional traffic generated by residential development.