Tasman Resource Management Plan

Proposed Plan Change 81: Urban Growth

Evaluation report under Section 32 of the Resource Management Act 1991

Report prepared by the Tasman District Council

June 2026

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(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the changes); and 204

(b) must be undertaken in accordance with section 32(1) to (4); and 204

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and 204

(d) must— 204

(i) be published in an evaluation report that is made available for public inspection at the same time as the decision on the proposal is notified; or 204

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section 204

(a) an evaluation report must be prepared under this Act; or 205

(b) a further evaluation must be undertaken under this Act. 205

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Abbreviations and Acronyms

The following abbreviations and acronyms are used throughout this report.

Abbreviation / Acronym	Meaning
FDS	Future Development Strategy 2022
GPS	Government Policy Statements
GPS-LT	Government Policy Statement for Land Transport
GPS-HUD	Government Policy Statement for Housing and Urban Development
HBA	Housing and Business Assessment 2024
IMP	Iwi Management Plan
LTP	Long Term Plan
MDRZ	Medium Density Residential Zone
MMP	Māpua Masterplan 2025
NCC	Nelson City Council
NES-F	National Environmental Standards for Freshwater
NES-CS	National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health
NES-P	National Environmental Standard for Papakāinga
NPS-FM	National Policy Statement for Freshwater Management
NPS-HPL	National Policy Statement for Highly Productive Land
NPS-I	National Policy Statement for Infrastructure
NPS-NH	National Policy Statement for Natural Hazards
NPS-UD	National Policy Statement on Urban Development 2020
NTLF	National Land Transport Fund
NZCPS	New Zealand Coastal Policy Statement
OSP	Outline Spatial Plan
PC81	Proposed Plan Change 81
RMA	Resource Management Act 1991
s 32	Section 32
SPP	Streamlined Planning Process
TDC	Tasman District Council
TRMP	Tasman Resource Management Plan
TRPS	Tasman Regional Policy Statement
TRPS C1	Proposed Tasman Regional Policy Statement Change 1
The Act	Resource Management Act 1991
The council	Tasman District Council
The Plan	Tasman Resource Management Plan

1. Executive Summary

1.1 Purpose of Plan Change 81

This s 32 evaluation of Plan Change 81 (PC81) to the Tasman Resource Management Plan (TRMP or the Plan) evaluates whether the proposed objectives are the most appropriate way to achieve the purpose of the Resource Management Act 1991 (RMA or Act), and whether the proposed provisions are the most appropriate way to achieve those objectives.

The purpose and primary drivers of PC81 are to give effect to the National Policy Statement Urban Development (NPS-UD), Tasman Regional Policy Statement (TRPS), and have regard to Council's Future Development Strategy (FDS) adopted in 2022. Importantly, the assessment of PC81 must also have regard to Tasman Regional Policy Statement Change 1 (TRPS C1), which is notified concurrently, and contains important updates to the TRPS that are necessary to give effect to the NPS-UD. The plan change also provides for additional business development opportunities and seeks to improve the role and functioning of commercial centres across the district.

The strategic direction of PC81 can be summarised as follows:

1. to implement the first ten years of residential and business land capacity as identified in the FDS, according to identified demand in the HBA;

2. to increase the variety of homes available within towns and urban centres, including helping to address housing typology gaps identified in the HBA;

3. to locate residential and business growth in appropriate urban locations, having regard to infrastructure capacity and environmental constraints;

4. to identify, support and reinforce the role and function of commercial centres across the district; and

5. to provide for the long-term planned growth of Māpua in accordance with the MMP, including maintaining capacity beyond the initial ten-year period.

The strategic direction statements describe the overall intent of the plan change. This overall intent has been important to inform the proposed objectives inserted into the TRMP, which are evaluated as part of this s 32 evaluation. In turn, those objectives are implemented by the other provisions of PC81, which are likewise assessed under s 32 in this report.

1.2 Overarching Growth Picture (Quantitative Summary)

The Nelson Tasman urban environment comprises the towns of Richmond, Brightwater, Wakefield, Māpua and Motueka and forms part of the shared Nelson Tasman urban environment. It is identified as a Tier 2 urban environment by the NPS-UD. Under the NPS-UD TDC has prepared a joint FDS with Nelson City Council, which, as required, provides for at least sufficient development capacity to meet expected demand for housing and business land, well-functioning urban environments and to assist with the integration of planning decisions with infrastructure planning and funding decisions (see cl 3.13 NPS-UD).

The Housing and Business Assessment 2024 (HBA) identifies that Tasman's urban environment would experience a shortfall in housing development capacity, in the medium term, as well as a mismatch between the types of housing enabled and those required to meet demand. Refer to the HBA in Appendix 4.

PC81 seeks to respond to these findings by increasing plan-enabled capacity across a range of settlements and development types, including both intensification within existing urban areas and managed greenfield expansion.

Demand and Existing Capacity for Housing Land

The HBA identifies:

- an overall shortfall in housing development capacity across the Tasman urban environment, in the medium term (yeas 4-10); and
- a lack of sufficient capacity for attached dwellings at some point over the thirty year period, in most towns within the Tasman urban environment to meet demand.

Housing land shortfalls generally are not uniform across the district. Some settlements experience localised constraints due to infrastructure not being available in time, while others have surplus capacity that can help meet some demand within the urban environment.

Shortfalls and Constraints of Housing Land by Location

The HBA and supporting analysis identify that:

- Motueka faces ongoing capacity constraints due to natural hazards, highly productive land, and infrastructure limitations, which restrict the ability to provide additional residential land;
- Māpua, Brightwater and Wakefield experience capacity shortfalls in the short or medium term, largely due to infrastructure timing constraints;
- Richmond plays a key role in providing surplus capacity, which is able to absorb some shortfalls from other locations where capacity cannot be provided.

In addition, across the Tasman urban environment there is a persistent undersupply of attached housing, reflecting a mismatch between enabled development and market demand.

Refer to Appendix 3 for the Infrastructure Report, and Appendix 17 and 24 where hazards are relevant.

Proposed Contribution of Plan Change 81

PC81 seeks to address these identified shortfalls by:

- enabling additional housing and business land capacity at more than 60 sites across the District;
- providing for a significant increase in potential housing supply over the next 10 years, including a wider range of housing typologies;
- enabling approximately 4570 additional dwellings and 76 hectares of business land, of which approximately 63 hectares is new business land (i.e. not currently a business zone); and
- supporting both intensification and managed greenfield growth, consistent with the FDS.

This results in a material increase in plan-enabled housing and business land capacity across the District and improves alignment between providing sufficient development capacity to meet expected demand.

Realisation of Capacity

While PC81 significantly increases plan-enabled capacity, the timing and extent to which this capacity is realised will depend on:

- the availability and sequencing of infrastructure;
- the resolution of some site-specific constraints; and
- market uptake and development commercial feasibility.

In some locations, particularly where infrastructure is constrained or uncertain, capacity is enabled ahead of full servicing, with delivery to be managed through staging, infrastructure investment, or developer-led solutions.

Summary

Overall, PC81 seeks to:

- respond to the identified shortfall in housing land development capacity, recognising that a shortfall will still remain;
- improve the distribution of housing capacity across the urban environment; and
- enable a broader range of housing types, including increased opportunities for intensification and medium density greenfield housing.

The following sections of this report set out the strategic approach taken to achieve these outcomes, and how growth is managed across different settlements.

1.3 Strategic Approach to Growth

PC81 adopts an integrated approach to enabling urban growth, combining intensification within existing urban areas with managed greenfield expansion. This approach reflects the need to provide sufficient development capacity to meet expected demand, while responding to infrastructure constraints, environmental limits, and changing housing preferences.

Enabling Intensification

A primary focus of PC81 is to enable greater levels of intensification within existing urban areas, particularly in Richmond, Brightwater, Motueka, Wakefield and Māpua.

This includes:

- enabling higher density residential zoning and development outcomes;
- supporting a broader range of housing typologies, including smaller and attached dwellings; and
- making more efficient use of existing infrastructure networks and urban land.

This approach responds directly to the identified shortfall in attached housing and supports more compact and efficient urban form.

Providing Greenfield Housing Land Capacity

In addition to intensification, PC81 provides for managed greenfield growth in selected locations identified through the FDS and supporting spatial planning processes.

These areas:

- provide capacity where intensification alone cannot meet demand; and
- are generally located to align with planned infrastructure investment and settlement patterns.

The scale and timing of greenfield development reflects both projected growth needs and the availability of servicing.

Providing a Range of Housing Choices

PC81 supports a wider range of housing options to better meet the needs of existing and future communities.

This is achieved through:

- enabling a mix of densities across different locations;
- increasing opportunities for smaller, more affordable dwellings; and
- supporting development outcomes suited to different household types and life stages.

Together, intensification and managed greenfield expansion contribute to a more diverse and adaptable housing supply.

Aligning Growth with Infrastructure

Urban growth enabled by PC81 is closely linked to infrastructure capacity and delivery.

Across the District:

- some locations are supported by existing or committed infrastructure with a clear delivery pathway;
- others are subject to constraints or uncertainty, requiring staged development or further investment.

PC81 responds to these differences by enabling growth while:

- recognising infrastructure constraints; and
- providing for delivery through staging, sequencing, or future investment.

Role and Function of Centres

PC81 also supports the ongoing development and function of commercial and business centres across the district.

This includes:

- reinforcing the role of key centres as focal points for business and community activity; and
- enabling additional business land and commercial opportunities in appropriate locations.

Refer to Appendix 12 for a town centres audit and Appendix 26 for an assessment of centres hierarchy.

1.4 Key Issues Addressed by PC81

The key urban development issues that PC81 seeks to address are summarised below.

Insufficient and Uneven Development Capacity

As discussed, there is a shortfall in housing and business development capacity across the Tasman urban environment, in the medium term.

Capacity is also unevenly distributed across settlements, with some areas unable to accommodate growth due to physical or infrastructure constraints, while others provide a surplus of capacity that can help meet part of the wider demand. Council has a statutory obligation to provide sufficient development capacity to meet expected housing and business demand under section 31 of the RMA.

Limited Housing Choice and Inefficient Use of Urban Land

There is a lack of diversity in housing choice, including a shortage of smaller and attached dwellings, which limits the ability to meet the needs of different households.

Where urban expansion occurs without sufficient variation in housing typologies, land can be used inefficiently. Enabling a wider range of housing types, including medium density development, is necessary to achieve more efficient and responsive urban outcomes and is a requirement of the NPS-UD.

Managing the Effects of Intensification

Responding to demand for increased housing choice requires greater levels of intensification, particularly within existing urban areas.

Higher density development can lead to changes in amenity, increased pressure on transport networks, and greater demand on infrastructure. These effects need to be appropriately managed to maintain safe and efficient functioning of the urban environment.

Infrastructure Capacity and Transport Constraints

Infrastructure capacity varies across the district and can limit the timing and scale of development.

In some locations, wastewater, stormwater and transport networks are already under pressure or are dependent on future upgrades. Increased development can also place additional demands on transport networks, potentially affecting their safety and efficiency.

Business Land Supply and the Role of Centres

There is a need to ensure sufficient and well-located business land to support economic growth and employment.

At the same time, the TRMP does not clearly articulate the role and function of commercial centres, making it difficult to manage their development, planned investment and respond to pressures such as out-of-centre retail development, which can undermine established centres.

Tangata Whenua Development and Papakāinga

There is unmet demand for housing for Māori, including papakāinga development, within the Tasman urban environment.

The current TRMP provisions create barriers to the use of ancestral land, including restrictive and complex rules and a lack of clear policy pathways for papakāinga development across different zones.

Outdated or Ineffective Planning Provisions

Some TRMP provisions are outdated or do not fully respond to current development needs, including:

- provisions that do not clearly provide for the type and location of growth required; and
- rules relating to activities such as seasonal worker accommodation, which are no longer aligned with current development practices.

Summary

These issues highlight the need for a coordinated approach to:

- enable a wider range of housing types;
- align growth with infrastructure capacity; and
- update planning provisions to reflect current and future needs.

1.5 Key Features of the Plan Change

PC81 introduces a comprehensive suite of amendments to the TRMP to enable urban growth and respond to identified capacity and planning issues.

The key features of the plan change are summarised below. These changes are implemented through amendments to zoning, objectives and policies, and supporting rules within the TRMP (refer Appendix 1).

Rezoning of Land for Urban Growth

PC81 rezones land across a range of settlements to provide additional capacity for residential and business activities.

This includes:

- new and amended objectives, policies, and rules;
- greenfield expansion areas;
- redevelopment and intensification opportunities within existing urban areas; and
- deferred zoning in locations where infrastructure is not yet available.

These rezonings deliver a substantial proportion of the development capacity identified in the FDS and enable growth to occur in planned locations.

Introduction of the Medium Density Residential Zone

PC81 introduces a new Medium Density Residential Zone (MDRZ) in key urban areas.

The proposed MDRZ seeks to:

- new objectives, policies, and rules;
- enable a greater intensity of development within existing urban areas;
- support a wider range of housing types, including smaller and attached dwellings; and
- apply a design-led framework to manage built form and amenity outcomes.

This zone represents the primary mechanism for enabling intensification and addressing identified housing typology gaps.

Business and Industrial Land Provision

PC81 provides additional business and industrial land in targeted locations.

This includes:

- new and amended objectives, policies, and rules;

- rezoning land to meet projected demand for commercial and industrial activities; and
- refining the location and extent of existing business zones.

These changes ensure sufficient land is available to support economic development, employment, and the functioning of centres.

Papakāinga and Māori Land Development Provisions

PC81 introduces a more enabling framework for papakāinga development across the District.

This includes:

- new and amended objectives, policies, and rules;
- clearer pathways for development across different zones; and
- provisions that reduce barriers to development on ancestral land.

In some locations, new papakāinga-zoned areas are also introduced to support Māori development aspirations.

Supporting Planning Framework and Provisions

PC81 also includes a range of supporting changes to improve the effectiveness of the TRMP.

These include:

- amendments to planning provisions to better manage the form and sequencing of development;
- updates to definitions and rules to reflect current development practices; and
- changes to enable activities such as workers' accommodation in a more practical and flexible way.

Summary

Together, these changes seek to:

- increase development capacity across the urban environment;
- enable a wider range of housing and business opportunities; and
- provide a clearer and more effective planning framework to provide for growth.

1.6 Approach in Māpua (Focused Summary)

PC81 includes provision for residential growth in Māpua; however, the scale and timing of development are influenced by infrastructure capacity and a degree of uncertainty regarding future servicing requirements.

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.

PC81 has regard to this long-term spatial intent by enabling the full extent of growth areas identified through the Masterplan.

Reduced and Managed Development Capacity

PC81 provides for development capacity in Māpua consistent with the long-term spatial framework identified in the MMP. While the full extent of this capacity is enabled through the zoning framework, its realisation will occur progressively over time, aligned with the delivery of infrastructure and the management of servicing demands.

This approach:

- prioritises the orderly sequencing of development in line with infrastructure upgrades and capacity; and
- enables development to proceed as infrastructure constraints are addressed, supported by policy mechanisms that manage the timing and scale of demand on servicing networks.

Managing Infrastructure Uncertainty

Infrastructure capacity in Māpua—particularly for wastewater, stormwater, and transport—remains subject to limitations (refer Appendix 3 Infrastructure Report).

PC81 responds to this by:

- enabling development while recognising infrastructure constraints;
- relying on staging, sequencing, and infrastructure planning processes to manage delivery; and
- avoiding reliance on large-scale upgrades that are not yet fully confirmed or funded.

This approach allows development to proceed where appropriate, while maintaining flexibility to respond to updated infrastructure information over time.

An options assessment for managing development capacity against infrastructure availability is included in Appendix 28.

Consistency with Strategic Planning

The plan change:

- has regard to the strategic direction of the FDS and the MMP; and
- maintains a pathway for longer-term growth in Māpua, subject to future infrastructure investment and planning processes.

Importantly, the plan change also gives effect to Policy 1 of the NPS-UD by contributing to a well-functioning urban environment that is resilient to the likely current and future effects of climate change. Without the approach taken to zoning in Māpua through PC81 it is likely that the ability of the settlement to adapt to existing and future sea level rise will be compromised.

Summary

The approach taken in Māpua reflects a balance between:

- enabling development to meet identified housing needs; and
- recognising infrastructure constraints and uncertainty.

This results in a planning framework that enables growth where it is feasible, while avoiding reliance on infrastructure capacity that is not yet established.

1.7 Statutory Context

PC81 is prepared within the statutory framework set by national and regional planning instruments, along with Council's adopted strategic planning documents. A full assessment is provided in Part 6 of this report.

National Policy Statement on Urban Development

PC81 must give effect to the NPS-UD which is the primary relevant national direction.

Under the NPS-UD, Council is required to, amongst other things:

- provide sufficient development capacity for housing and business land in the short, medium, and long term; and
- ensure that capacity is well-functioning, including supporting a range of housing types and enabling urban intensification.

PC81 gives effect to these requirements by increasing development capacity and enabling a broader mix of housing typologies within the urban environment.

Tasman Regional Policy Statement – Change 1

TRPS C1 incorporates national direction, including the NPS-UD, and further implements the spatial strategy and growth framework set out in the FDS.

In preparing PC81, Council is required to give effect to the operative TRPS, and to have regard to the proposed provisions of TRPS C1. PC81 responds to this framework by:

- implementing the spatial pattern and distribution of development capacity identified through the FDS; and
- aligning district plan objectives, policies and methods with the updated regional policy direction, including the provision of sufficient development capacity and the achievement of well-functioning urban environments.

FDS

The FDS provides the spatial framework for accommodating growth across the shared Nelson Tasman urban environment. PC81 has regard to the FDS by:

- enabling development in locations identified for growth; and
- delivering a substantial proportion of its development capacity required over the first ten years.

MMP

The MMP provides the long-term spatial framework for Māpua's residential and business growth. PC81 has regard to the MMP by;

- enabling the full extent of growth areas identified through the Masterplan; and
- prioritising the sequencing of development in line with infrastructure upgrades and capacity and enabling development to proceed as infrastructure constraints are addressed.

Other Relevant Planning Documents

PC81 has also been informed by more detailed planning work, including:

- the Richmond Spatial Plan.

This document has provided additional guidance for Richmond on the location, form, and sequencing of development.

Summary

Together, these instruments require Council to provide sufficient and appropriate development capacity and to manage urban growth in a coordinated and planned way. PC81 represents the primary mechanism for implementing this direction.

1.8 Reasonably Practicable Options

In accordance with s 32(1)(b)(i) of the Resource Management Act, a range of reasonably practicable options were considered for achieving the objectives of PC81. The amendments are in Appendix 1 (Schedule of Amendments).

Three options were applied to each the three categories of objectives:

1. Evaluation of provisions in achieving the land for residential activities objectives
2. Evaluation of provisions in achieving the land for commercial activities objectives
3. Evaluation of provisions in achieving the papakāinga development objectives

Assessment of Preferred Approach

The evaluation concludes that Option (a) – a comprehensive package of provisions – is the most appropriate option for achieving the objectives.

This option:

- directly responds to identified shortfalls in development capacity and housing typologies;
- provides a clear and consistent framework for decision-making;
- enables development in locations identified through the FDS; and
- supports a coordinated approach to growth that is integrated with infrastructure planning and capacity and responds to environmental constraints.

As examined in Part 10 of this report, the benefits of this approach outweigh the costs, particularly given the risks associated with not acting, including ongoing , and significantly larger capacity shortfalls and failure to meet statutory obligations.

Options for Zoning and Spatial Planning

In addition to the overall planning approach, other reasonably practicable options were considered for each proposed site and zoning change. These included:

- retaining the existing zoning (status quo);
- rezoning land to a more appropriate zone;
- downzoning land from deferred zones where urban development is no longer appropriate; and
- applying or amending spatial layers such as overlays or other planning controls.

These options were assessed in detail in the Site Assessment Report (Appendix 2), taking into account:

- development capacity and demand;
- infrastructure availability and timing;
- natural hazards;
- environmental and cultural values; and
- alignment with strategic planning directions.

The preferred zoning outcomes reflect the most appropriate balance between enabling development and managing site-specific constraints.

Assessment of Objectives

For the purposes of s 32(1)(a), the proposed objectives have been evaluated in terms of the extent to which they are the most appropriate way to achieve the purpose of the Act.

This evaluation concludes that the new and amended objectives (Option a) are the most appropriate way to achieve the purpose of the Act, as they:

- provide clear direction for managing urban growth;
- respond to the identified resource management issues;
- give effect to higher order planning documents such as the NPS-UD and TRPS;
- have regard to the FDS, MMP and TRPS C1; and
- allow for current and future generations to provide for their social, economic, and cultural well-being and for their health and safety while achieving the other parts of s 5 RMA, including as contemplated by the NPS-UD and while avoiding, remedying, or mitigating any adverse effects.

Summary

Overall, the s 32 evaluation concludes that:

- the proposed objectives are the most appropriate way to achieve the purpose of the Act; and
- the proposed package of provisions in PC81, including the identified zoning outcomes, are the most appropriate method for achieving those objectives.

The evaluation further concludes that the proposed provisions are an efficient and effective method for achieving the objectives, having regard to:

- the reasonably practicable options considered;
- the environmental, economic, social and cultural costs and benefits anticipated from implementation of the provisions;
- the risks of acting or not acting; and
- economic growth and employment.

This approach provides a clear and implementable framework to manage growth, while balancing the need to provide development capacity with the protection of environmental and cultural values and the efficient use of infrastructure.

1.9 Outcomes Expected

PC81 is expected to deliver a coordinated and integrated response to the growth pressures facing Tasman's urban environment. The outcomes expected from PC81 reflect, at a high level, the outcomes sought in response to the key resource management issues identified in Section 4.

PC81 will provide a significant increase in development capacity for both housing and business activities across the District, addressing identified shortfalls in the medium term and implementing growth in accordance with the FDS.

It will enable a wider range of housing choices, including more intensive and smaller-scale forms of development, better meeting the needs of different households and communities, supporting more affordable housing outcomes, and addressing the current mismatch between enabled development and demand.

By enabling both intensification and managed greenfield development, PC81 will support a more efficient and compact urban form, making better use of existing infrastructure, reducing pressure for outward expansion, and contributing to more accessible and connected urban environments.

PC81 also provides a framework for aligning development with infrastructure capacity and delivery. While infrastructure constraints and uncertainties remain in some locations, development is enabled across the identified growth areas, with the timing and sequencing of development managed through infrastructure delivery and supporting policy mechanisms. This supports a pragmatic and staged approach to growth.

PC81 will strengthen the role and function of centres by ensuring sufficient business land is available to meet future demand, supporting economic activity and employment, reinforcing centres as focal points for communities, and providing a clearer framework for commercial development.

It will also improve opportunities for papakāinga and Māori land development by reducing barriers within the TRMP, providing clearer policy direction, and enabling development across a wider range of locations, supporting more equitable and inclusive outcomes.

Overall, PC81 will provide sufficient and appropriately located development capacity, enable a broader mix of housing and business opportunities, support a more efficient and connected urban form, and ensure growth is managed in a coordinated and adaptable way. Together, these outcomes contribute to a well-functioning urban environment consistent with national and regional direction and achieving the purpose of the RMA.

2. Overview and Purpose

2.1 Requirements of Section 32 RMA

Section 32 RMA requires an evaluation of whether the proposed objectives are the most appropriate way to achieve the purpose of the Act, and whether the proposed provisions are the most appropriate way to achieve those objectives.

In undertaking that evaluation, s 32 requires consideration of reasonably practicable options for achieving the objectives, and an assessment of the efficiency and effectiveness of the proposed provisions in achieving those objectives. This includes identifying and assessing the anticipated environmental, economic, social and cultural costs and benefits of the provisions, including opportunities for economic growth and employment that may be provided or reduced, quantifying those costs and benefits where practicable, and assessing the risk of acting or not acting where there is uncertain or insufficient information about the subject matter of the provisions.

Section 32 also requires the evaluation report to summarise the reasons why the proposed provisions have been chosen. In addition, s 32(4A) requires the report to summarise advice received from iwi on the proposal, how the proposal responds to that advice, and any provisions intended to give effect to that advice.

The purpose of s 32 is to support transparent and robust resource management decision-making through the use of sound evidence and evaluative analysis.

This evaluation has been undertaken in accordance with s 32. Relevant sections of the Act are provided in Appendix 21.

2.2 Purpose of Plan Change 81

The purpose and primary drivers of PC81 are to give effect to the NPS-UD, TRPS and to have regard to the FDS, MMP and TRPS C1. Consideration has also been given to other relevant planning documents such as the Richmond Spatial Plan.

The strategic direction of PC81 can be summarised as follows:

6. to implement the first ten years of residential and business land capacity as identified in the FDS, according to identified demand in the HBA;

7. to increase the variety of homes available within towns and urban centres, including helping to address housing typology gaps identified in the HBA;

8. to locate residential and business growth in appropriate urban locations, having regard to infrastructure capacity and environmental constraints;

9. to identify, support and reinforce the role and function of commercial centres across the district; and

10. to provide for the long-term planned growth of Māpua in accordance with the MMP, including maintaining capacity beyond the initial ten-year period.

The broad outcomes sought by PC81 are implemented through the proposed objectives, later identified in the report. The assessment under s 32(1)(a) RMA is directed to the proposed TRMP objectives.

2.3 Purpose of the Tasman Resource Management Plan

Tasman District Council is a unitary authority. The TRMP is a combined Regional and District Plan that contains the planning objectives, policies and rules for how people can use our land and resources. It also contains zones, for example, the Residential Zone or Rural Zone which identifies the intended use of that land.

TDC has district planning functions under s 31 RMA. Accordingly, s 75 (3) of the RMA states that a District plan must give effect to any national policy statement, any New Zealand coastal policy statement, a national planning standard and any regional policy statement. Tasman has an operative regional policy statement which is proposed for change concurrently with this plan change.

S 74 (2) (b) (i) of the RMA requires Council to have regard to strategies prepared under other Acts, when changing a district plan. Such strategies include the FDS, and the MMP were prepared under the Local Government Act 2002.

2.4 Background to PC81

Growth for business and housing

The NPS-UD contains objectives and policies that councils must give effect to, in their resource management documents and planning decisions. The TRMP and TRPS require updating to implement the NPS-UD, although in relation to those parts of the TRPS that remain relevant to this plan change, PC81 gives effect to those.

TRPS C1 is proposed for notification concurrently with PC81.

Relevant objectives and policies of the NPS-UD require Council to:

- Provide sufficient housing and business land capacity in Tasman's urban environment, enabling more people to live in and more businesses and community services to be located in well-functioning urban environments (e.g. objective 1, objective 3, policy 2, policy 7)
- Provide a diverse range of housing types including medium density and papakāinga, acknowledging that urban environments including their amenity values, develop and change over time (e.g. objective 2, objective 4, policy 1, policy 5, policy 6)
- Take into account the principles of the Treaty of Waitangi when making planning decisions relating to urban environments (objective 5) and in relation to urban environments, involve hapū and iwi in the preparation of RMA planning documents by undertaking effective consultation that is early, meaningful and as far as practicable, in accordance with tikanga Māori (policy 9)
- Have particular regard to plan change proposals for urban development (either unanticipated or out of sequence) that would add significant development capacity and contribute to well- functioning urban environments (e.g. objective 6, policy 8, clause 3.8)

Policies 5 and 7 and clauses 3.6, 3.11, 3.35 and 4.1 of the NPS-UD contain directions for councils to give effect to in their district plans, to implement the above objectives and policies. Not all the requirements of the NPS-UD are within the scope of this Plan Change as detailed in Section 2.5.

Additionally, PC81 has regard to and helps to implement Council's adopted Nelson Tasman FDS, which was adopted by the Joint Committee of the Nelson City and Tasman District Councils in August 2022. The FDS is a high-level strategy, informing a large number of Council's plans including the Resource Management Plans, the Long Term Plan (LTP) and Infrastructure Strategy, as shown in Figure 1. The FDS identifies a spatial growth pattern for the next 30 years and sites that are suitable for housing and business development. The FDS implements the NPS-UD as Tasman is a "Tier 2

Council" which must prepare an FDS. When changing the TRMP (and other planning documents such as the Tasman Regional Policy Statement) Tasman is required to have regard to the relevant FDS.

Table 3 of the FDS also notes as one of the short term key actions, that a review of the TRMP should be undertaken and/or progress plan changes to enable intensification.

The FDS adopts a spatial strategy for growth and identifies appropriate sites for future housing and business capacity in the region and assists PC81 in giving effect to the NPS-UD (e.g. policy 2).

Under the NPS-UD, Tasman shares a tier 2 urban environment with Nelson. The urban environment as defined by the NPS-UD includes, Nelson, Richmond, Brightwater, Wakefield, Māpua and Motueka (Figure 1.)

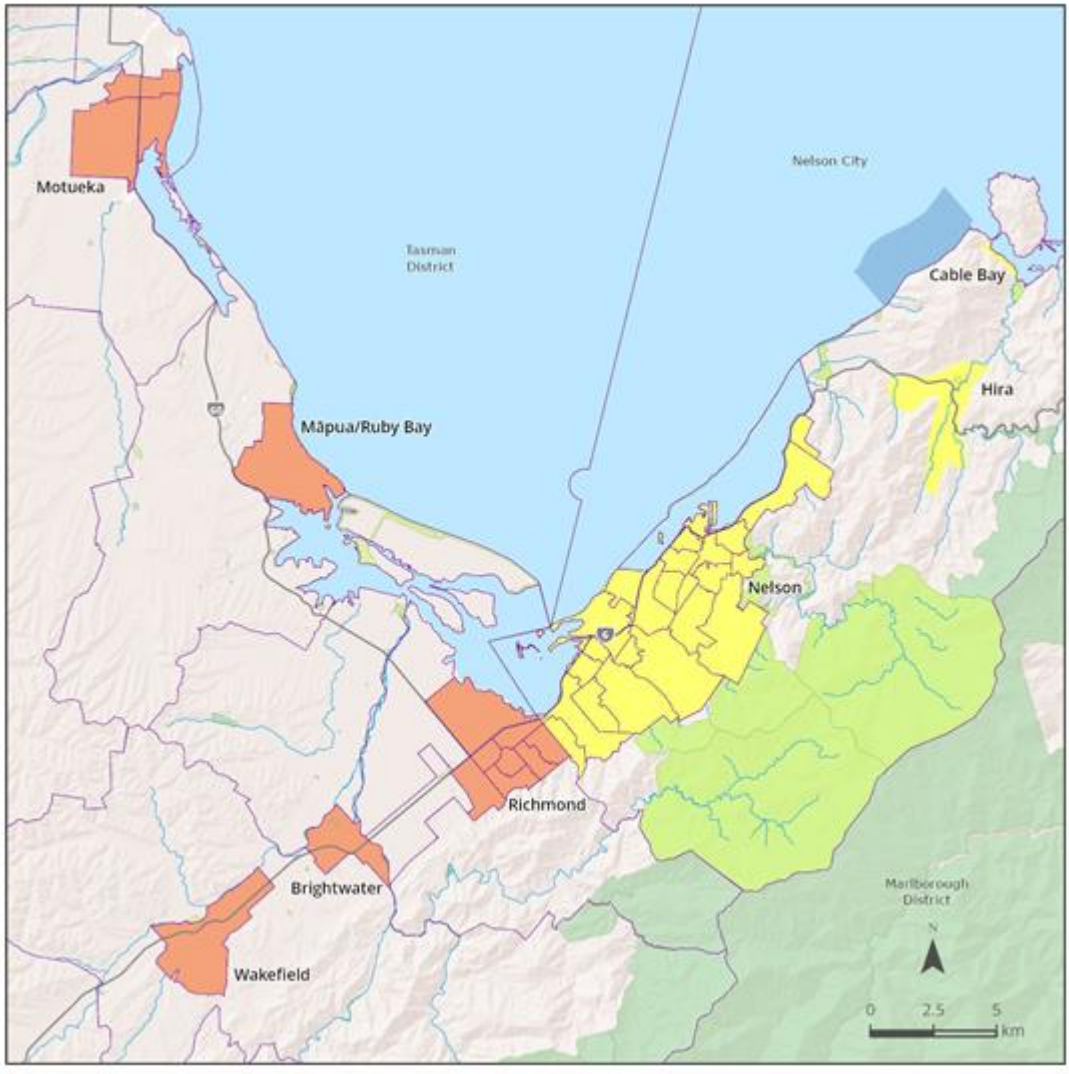

Figure 1. Nelson/Tasman Urban Environment. Tasman = Nelson =

Council's latest Housing and Business Assessment

The NPS-UD also requires Council to prepare a three yearly Housing and Business Assessment and annual monitoring report on the housing and business markets. Both the FDS, HBA and annual monitoring reports are prepared jointly with Nelson City Council.

Tasman's latest[1] HBA identifies that population in Tasman is projected to grow by 7,400 residents between 2024-2034 and almost a further 11,000 residents by 2054. The ageing population is driving a change in the average household size across the district. The average household size is projected to decrease from 2.43 to 2.23 over the next 30 years. The HBA shows in which towns dwellings are likely to be provided but that there will still be a shortfall of approximately 360 dwellings between 2028-2034 to meet the expected growth demands. The combination of high population growth and a small rating base means it is challenging for Tasman to afford the required infrastructure investment quickly enough to ensure there is sufficient development capacity during this period. The 2024 HBA is included in Appendix 4.

When Tasman's dwelling shortfall is combined with Nelson City Council's shortfall, identified in its HBA, this grows to a combined shortfall of 600 dwellings in the medium term (2028-2034). In terms of dwelling typology, Tasman will also have a shortfall of 735 attached dwellings over the 30 year period, (semi-detached or duplex, terraced house or apartment), based on current zoned land in the TRMP and developer historical preferences. This plan change seeks to ensure that some of the newly zoned land in and around main towns will provide smaller houses, via a new MDRZ.

The 2023 census results show that between 2018-2023, Tasman was the fastest growing region in New Zealand at 10.3%. the district grew by an extra 5,418 people, reaching 57,810 in 2023. At the same time, all other regions grew less than 9%. During the same period, Tasman's dwelling count increased by 11% from 23,733 to 26,352 (+2,619). Latest subnational population estimates from Stats NZ in October 2024 show that Tasman's population grew by 1.16% year ending June 2024, to reach 60,000.

The 2023 census reports that almost half of Tasman's population growth since 2018 was in the Richmond ward, growing at 15% but predominantly in Richmond West. The Lakes Murchison ward and Golden Bay ward grew at 10%. Motueka ward has the highest proportional ethnic diversity, having a higher proportion of residents who identify as Māori, Pacific Peoples and Asian than the rest of the wards. Motueka's Māori population represents 16% of the total, a rise from 15% in 2018.

Between 2024-2054 the HBA identifies demand for approximately a further 20 hectares of industrial and retail/commercial land. Sufficient suitable sites are identified in the HBA such that a surplus of business land remains in the District overall, according to the latest business land demand model. However, the accuracy of the model and the business land demand forecasts is questionable. When other projections for business land demand are examined (as required by the NPS-UD), much higher demand appears to exist, for example, recent building consent trends. Projecting building consent trends suggests no surplus business land capacity exists in the HBA. In addition, Nelson City Council has identified a shortfall of commercial, retail and industrial land in the medium and long term (2028-2054). This means Tasman needs to provide for this shortfall as part of the shared tier 2 urban environment.

S.35 RMA Efficiency and Effectiveness Review

Council undertook an efficiency and effectiveness (RMA s 35) review of the operative TRMP provisions in 2021, including urban growth and infrastructure. This has helped to understand the current situation including where current Plan provisions may not be efficient and effective at addressing the above resource management issues. The relevant findings of the s 35 report on Urban Environment Effects were:

[1] *At the time of notification of PC81 the 2024 HBA remains the most current information available. However, Council is currently working on HBA data for the LTP 2027-2037*

- Limited intensification of housing is occurring where enabled e.g. Richmond Intensive Development Area, Richmond West and Richmond South Development Areas
- The suitability of the zoned business land capacity requires further assessment
- The plan lacks a commercial centre and settlement hierarchy that takes into account the influence of Nelson City. This would be helpful for the district's larger settlements in that it would reduce the risk of inappropriate development compromising planned growth outcomes and better coordinate infrastructure provision
- Tasman's towns all currently share one overall objective in the TRMP (6.7) for historical reasons, rather than each town having a separate objective
- The proposed consolidated regional business park in Richmond West (now known as Berryfields) ended up as residential developments through Special Housing Areas (Central Government initiative) in 2018

The relevant recommendations of the s.35 report on Urban Environment Effects were:

- update chapter 6 of the TRMP to reflect the requirements of the NPS-UD
- urban land supply and the policy framework in the TRMP needs to align with the FDS
- ensure business land, including industrial land is provided in the right locations to support regional economic development over the next 30 years. For Murchison in particular, recommendations included reviewing the issues comprehensively and investigate new areas for business land
- enable more affordable housing options by encouraging a greater variety of housing types and encouraging higher density in identified locations
- apply stronger requirements for quality urban design where housing intensification is enabled
- develop objectives for each town, expressing the functional relationship between each town and develop a centre hierarchy. For Richmond, develop an intra-centre hierarchy to help manage future business development in Richmond

Work on a new RMA was programmed to commence following the s 35 reviews in 2021. However, due to the uncertainty of Resource Management Reforms of successive Governments development of a new Plan is currently paused.

Workers' Accommodation

While the NPS-UD and FDS focus on growth and development in urban environments, the specific matter of seasonal workers' housing—often situated in rural areas—was raised as a key issue for this plan change. This issue emerged through feedback from primary producers, industry groups, and community consultation, who highlighted the ongoing challenges in providing timely and adequate accommodation for seasonal and permanent workers in Tasman's horticultural and agricultural sectors.

The broader issue of rural housing and general living opportunities is not within the scope of this plan change. However, the specific issue of better enabling workers' accommodation is recognised, given the seasonal demand for housing and its knock-on effect on the availability of permanent rental stock in the district. The current provisions in the TRMP are considered too restrictive because they require large minimum site areas for workers' accommodation, assume outdated building layouts (such as separate ablution and kitchen blocks), and impose complex consent pathways that increase costs and delays for employers. These constraints have made it difficult for growers and rural businesses to respond flexibly to seasonal labour needs and have contributed to pressure on local housing markets as workers seek accommodation in towns and settlements.

This Plan Change aims to address these issues by introducing more flexible and enabling provisions for workers' accommodation in rural zones. The proposed amendments reduce minimum site size requirements, allow for modern, integrated accommodation facilities, and provide a clearer and

more streamlined consent pathway. In doing so, the plan change seeks to increase the capacity and timeliness of seasonal worker accommodation, reduce pressure on the permanent rental market, and ensure that Tasman's primary industries can continue to operate efficiently and sustainably. These changes are intended to align the findings of Tasman's latest HBA 2024, as per clause 3.23(2) of the NPS-UD, which requires councils to meet demand for a range of housing types—including accommodation for seasonal workers—across the district. Refer to Appendix 14 for more information.

The Māpua Masterplan

The purpose of 'Master planning' is to provide high level direction, integrated across servicing, transportation, planning and community infrastructure functions. Masterplans anticipate future plan change processes to implement the planning outcomes.

The MMP process sought to provide a strategic outline for the future growth of the Māpua village. It combined direction from the FDS (above) with more detailed planning of infrastructure, recreation and reserves, and engagement with ngā iwi partners, landowners and the Māpua community. The process involved revisiting existing deferred zones as well as consideration of new sites for growth and development opportunities.

The MMP identified actions required to implement its findings. Actions included required TRMP changes to provisions (text) and zones (maps), and other supporting actions not related to RMA processes. Under s 74 (2) (b) (i), regard is had to the MMP in informing the Māpua components of PC81. The MMP and information about the process can be found on the Council's website.

2.5 Plan Change 81 Proposed Changes and Scope

This section describes the full scope of Proposed PC81, outlining the substantive changes to the TRMP and clarifying both the matters addressed and those that are intentionally excluded. The purpose is to provide a clear understanding of what PC81 seeks to achieve, the mechanisms it uses, and the boundaries of the plan change.

Overview

PC81 gives effect to the NPS-UD, TRPS, and has regard to the FDS, MMP and TRMP C1. The plan change responds to the need for additional residential and business development opportunities, improved housing choice and diversity, and better provision for Māori housing and papakāinga, while also supporting economic growth and well-functioning urban environments.

Key Changes Proposed

PC81 proposes a comprehensive suite of amendments to the TRMP which are attached in Appendix 1 and included in Table 1 below:

Table 1 Key proposed changes

Key component	Description of change	Contribution to PC81 strategic direction
Rezoning of land for urban growth	Rezoning of land across multiple settlements to provide additional capacity for residential and business activities, including managed greenfield expansion, redevelopment opportunities and deferred zoning where infrastructure is not yet available.	Delivers the majority of the capacity of sites required in the first ten years as identified in the FDS and supports provision of capacity in appropriate locations.

MDRZ	Introduction of a new MDRZ in key settlements, supported by a design-led framework to enable a wider range and intensity of housing types, including smaller and attached dwellings.	Increases housing variety and addresses identified housing typology gaps, particularly for smaller and more affordable dwellings.
Urban intensification provisions	Amendments to subdivision and land use provisions to enable greater density within existing urban areas, including changes to height, site coverage and development standards.	Enables more efficient use of urban land and infrastructure and supports intensification outcomes within existing settlements.
Business and industrial land provision	Rezoning and refinement of commercial and industrial land supply in targeted locations to ensure sufficient capacity is available to meet projected demand.	Provides capacity to support economic growth, employment and the functioning of commercial centres.
Papakāinga provisions	Introduction of a more enabling policy and rule framework for papakāinga across multiple zones, providing clearer pathways and reducing barriers to development on ancestral land.	Supports provision of a wider range of housing options and improves housing outcomes for Māori.
Urban centres hierarchy	Establishment of a hierarchy of commercial and neighbourhood centres, clarifying their roles and strengthening policy direction on the location and scale of commercial activities.	Reinforces the role of centres and supports efficient and consolidated patterns of commercial development.
OSPs	Introduction of OSPs for key growth areas to guide coordinated development, including transport, infrastructure, open space and staging.	Ensures coordinated delivery of infrastructure and urban development and improves overall urban outcomes.
Deferred zoning and infrastructure sequencing	Application of deferred zoning to manage the timing of development relative to infrastructure availability and servicing constraints.	Ensures growth occurs in appropriate locations and is aligned with infrastructure provision.
Māpua growth management	Application of urban zones in Māpua to give effect to the spatial extent of growth identified in the Māpua Masterplan 2025.	Supports both delivery of short-term growth capacity and the safeguarding of longer-term (30-year) growth areas, recognising infrastructure constraints and staging requirements.
Workers' accommodation provisions	Amendments to rural zone provisions to enable more flexible provision of seasonal and permanent worker accommodation.	Contributes to housing supply and supports economic productivity, particularly in the primary sector.
Supporting and consequential amendments	A range of supporting changes across the TRMP (e.g. transport, subdivision, definitions, noise mitigation and information requirements) to ensure consistency and effective implementation.	Ensures the plan change operates effectively as a coherent and integrated package of provisions.

Housing and Business Capacity – Demand and Supply Overview

The HBA identifies any projected shortfalls in residential and business land capacity across Tasman's urban environment including both the overall volume of capacity required and the types of development needed to meet demand.

In particular, the HBA identifies:

- an overall shortfall in housing land capacity in the medium term; and
- a significant mismatch between the types of housing currently enabled and those required to meet future demand, including a shortfall in attached dwelling typologies.

PC81 responds to these identified shortfalls by providing additional plan-enabled capacity across multiple settlements, including both managed greenfield expansion and opportunities for intensification within existing urban areas. This includes enabling a wider range of housing types and improving the availability of business land in appropriate locations.

While PC81 significantly increases plan-enabled capacity, the extent to which this capacity can be realised over time is influenced by the availability and timing of infrastructure, which is addressed later in this report.

Matters Out of Scope

PC81 is intentionally limited in scope. The following matters are out of scope and are not addressed by this plan change:

- **NPS-UD Matters Not Addressed:**
  PC81 does not implement all requirements of the NPS-UD, such as a comprehensive set of urban zone objectives for every urban zone, or all requirements for urban form and infrastructure integration. However, the changes give either full or partial effect to the relevant objectives and policies.
- **FDS Recommendations Not Included:**
  Not all recommendations or sites identified in the FDS are implemented through PC81. PC81 provides for the first 10 years of housing and business land capacity for Tasman (except Māpua), but not all key actions in the FDS are included.
- **Māpua Masterplan Matters Not Included:**
  PC81 implements only those aspects of the MMP that relate directly to urban and commercial growth provisions in the TRMP. Other MMP actions—such as non-RMA infrastructure projects, ecological restoration, or community initiatives—are not within the scope of this plan change. However, positive effects (e.g. ecological restoration and community outcomes) to the extent they are associated with the growth aspects that are central to this plan change are considered under RMA framework.
- **Current Mixed Business, Commercial, and Residential Zone Provisions:**
  The plan change does not undertake a comprehensive review or rewrite of all existing mixed business, commercial, or residential zone provisions in the TRMP. Existing rules, standards, and policy frameworks for zones not directly affected by the new MDRZ, rezoning, or papakāinga provisions remain unchanged, except for minor consequential amendments.
- **Existing Urban Zones Not Reviewed:**
  PC81 does not review or update the full suite of existing urban zones across the district. Only those zones and sites specifically identified for change (e.g., rezoning, MDRZ, or deferred zoning) are addressed. Broader urban design, amenity, or infrastructure issues in existing urban zones are not comprehensively reviewed.
- **Rural Living Opportunities (Except Workers' Accommodation):**
  The plan change does not address rural living opportunities outside of targeted changes to

workers' accommodation. Broader issues such as second dwellings, rural subdivision, or lifestyle block development are not within scope.

- **Other Out of Scope Matters:**
  PC81 does not address a comprehensive review of the TRMP or the TRPS (beyond the concurrent TRPS C1), broader environmental, heritage, or landscape provisions not directly related to the rezoning or intensification sites, or non-statutory strategies, operational matters, or LTP projects that are not directly implemented through TRMP amendments.

Further Detail

Further detail on the proposed sites, their locations, and the zoning framework is provided in the Site Assessment Report in Appendix 2 and the accompanying planning maps (Appendix 1). The full schedule of amendments, supporting technical reports, and site assessments are available as appendices to this report.

2.6 What are the Key Reasons for the Changes to the TRMP?

The TRMP's operative urban development provisions pre-date the NPS-UD. As a result, amendments are proposed to assist the TRMP to give effect to the NPS-UD and TRPS, and to have regard to the FDS, MMP and TRPS C1.

Council commenced a review and preparation of new Resource Management Plans in 2019 (including the s 35 review detailed above). This process was paused in late 2023 due to the emergence and subsequent repeal of new legislation and ongoing law changes following the 2023 General election. The TRMP and TRPS therefore remain, in some respects, dated.

On housing capacity specifically, the proposed sites for rezoning in PC81 will not entirely meet projected demand according to the HBA 2024[2]. Tasman will still have a shortfall of approximately 360 dwellings in the next ten years, which underlines the importance of these proposed rezonings proceeding, otherwise the shortfall will be much greater. Clause 3.2(2) of the NPS-UD requires tier 2 local authorities to provide sufficient development capacity to meet expected housing demand. To qualify as "sufficient" under the NPS-UD framework, development capacity must, among other things, be plan-enabled, infrastructure-ready, feasible and reasonably expected to be realised. The HBA 2024 provided this analysis. PC81 proposes rezonings intended to help increase the amount of plan-enabled housing and business land capacity available within Tasman's urban environment.

The operative TRMP imposes barriers on tāngata whenua using their ancestral land to develop papakāinga:

- The lack of a dedicated set of objectives and policies;
- Permitted activities under the existing definition of papakāinga zone are too constrained.
- Rules fail to recognize that papakāinga could occur in urban locations as well as rural locations.
- A clear pathway does not exist if the proposal is on non-Papakāinga Zone land (e.g. Residential Zone)

The definitions and rules about where seasonal workers can live on farms, orchards and vineyards etc. are currently too restrictive and outdated. For example, the definition assumes that ablution

[2] Over the course of the PC81 statutory process, updated HBA information will likely become available.

blocks and kitchens will be separate from the accommodation, whereas most modern accommodation is purpose built with combined facilities.

As urban areas grow and change, there is a risk that the vibrancy and efficiencies of town centres may be compromised by sprawling or ad hoc commercial developments. Acknowledgement of the role and function of existing town centres (and neighbourhood centres in the larger towns) by creating a hierarchy may mitigate this risk. Such a hierarchy may retain and enhance the vibrancy, and efficiencies of town centres as compact hubs of economic, social and cultural activity and to realise efficiencies relating to their maintenance, upgrades and extension of network infrastructure.

3. Information Sources and Consultation

3.1 Information Sources

The following information sources have been used by Council to understand the issue and develop the options.

Statutory documents:

- Nelson Tasman FDS, the accompanying technical report and FDS map viewer FDS 2022 - 2052 | Tasman District Council
- FDS annual implementation plan 2024 and 2025 FDS 2022 - 2052 | Tasman District Council
- Tasman's 10 year plan 2024-2034 Tasman's 10-Year Plan 2024 - 2034 | Tasman District Council, including the activity management plans
- Tasman HBA Capacity assessments | Tasman District Council and Nelson Tasman Housing Business Assessment 2024 (Appendix 4)

Non statutory documents:

- Tasman District Council's growth model Growth model | Tasman District Council
- Tasman District Council's 'Housing We'd Choose' 2021 report and technical appendices Capacity assessments | Tasman District Council
- Infrastructure, servicing, natural environment and natural hazards assessment for PC81 sites proposed for zoning– Site Assessment Report (Appendix 2). This is a second stage evaluation for each site, as each site has already been assessed as part of developing the FDS
- Infrastructure Report (Appendix 3)
- Mapua Master Plan
- Richmond Spatial Plan
- Tasman Town Centre Audits 2020 and 2024 Capacity assessments | Tasman District Council also provided at Appendix 12
- Transport Memorandum (Appendix 5)
- On-site Wastewater Disposal Assessment Report – Proposed Rural Residential Sites (Appendix 6)
- TRMP Noise Limit Change Memorandum (Appendix 7)
- Capacity Estimates Memorandum (Appendix 8)
- Social Impact Assessment (Appendix 9)
- Open Space Assessment (Appendix 10)
- Impact Assessment of Potential Retail Development Scenarios in Tasman (Appendix 11)
- Tasman Town Centre Audit (Appendix 12)
- Works Accommodation Memorandum (Appendix 14)
- Medium Density Provisions Memorandum (Appendix 15)
- Coastal Inundation Assessment of Specific Māpua Masterplan Sites (Appendix 17)
- Preliminary Geotechnical report at 120 Higgs Road and 49 Stafford Drive (Appendix 18)

- Mixed Business Zone Provisions Issues and Options – Retail Activities (Appendix 19)
- Assessment against the National Policy Statement for Natural Hazards Risk Matrix, Likelihood and Consequences Table (Appendix 24)
- Economic Assessment (Appendix 25)
- Commercial Centre Hierarchy Memorandum (Appendix 26)
- Road Traffic Noise Modelling (Appendix 27)
- Options Evaluation Māpua (Appendix 28)

These reports are referenced throughout the assessment sections of this report, where relevant to the evaluation findings.

3.2 Consultation Actions to date

PC81 engagement (concurrent with TRPS Change 1 engagement)

In his Directions, the Minister directed pre-notification consultation and engagement with the community and affected parties on the Plan Change as approved for the Streamlined Planning Process (SPP). Most of this consultation and engagement occurred before the Minister approved the use of the SPP process and is described below in detail.

An engagement summary for stakeholders is included in Appendix 16 and Ngā mihi Iwi in Appendix 13.

Pre-engagement

In mid-October 2024, articles were published in the Council's "Newsline," the Waimea Weekly, in the Environmental Policy Newsletter, on Council's website and consultation website "Shape Tasman" and social media about PC81 and TRPS C1, supported by a Google Adwords campaign, all inviting feedback from the community.

At the same time an information booklet was sent to all landowners of sites proposed for urban rezoning in PC81 and all residents of the town affected by both plan changes. 21,800 pamphlets were circulated to all the towns in the PC81 catchment and placed in Tasman libraries.

The Shape Tasman page featuring PC81 had 1,400 visits around this time. We received detailed feedback on the proposals from approximately 25 residents, varying from further general information requests about the plan change to clarification of the proposals for their land and in a very small number of cases, requests to consider alternative sites for zoning.

Engagement

On 27th March 2025 a comprehensive guide to the draft PC81 and draft TRPS C1 was prepared and distributed in Tasman's libraries and service centres, as well as posters for the same locations. Council's 'Newsline' also featured the plan change in March and April. Drop in events were held for the community at 8 venues across Tasman between 5th and 16th April - Richmond, Brightwater, Wakefield, Māpua, Motueka, St Arnaud, Murchison and Tākaka - and the guide was also available there.

Webinars were held in April and site visits undertaken in May/June to understand local issues. Letters were sent to all affected landowners and adjoining landowners before or early in the PC81 engagement period. Emails were sent to growers re workers' accommodation and residential/business developers in the region.

Over 120 individual written items of feedback were received during the engagement period. A summary of feedback is publicly available on the Council website[3]. Overall, there was a mix of support and concern from the community for the Draft TRPS C1. Concerns were raised about pace of growth potentially outstripping infrastructure capacity, noise, intensification effect on community character and flood risks. Support was noted for ensuring sufficient residential and business land capacity, consolidating commercial centres, aligning development with the FDS and ensuring efficient land use. Feedback on Draft TRMP PC81 included some landowners seeking that their land be included for rezoning in PC81, support for enabling and simplifying the workers' accommodation framework and general support for intensification and efficient use of land. Concerns raised included some landowners strongly opposing the rezoning of their land, the need to protect highly productive land, and the impact of intensification on character, three waters and transport infrastructure.

Following the engagement on the draft, site visits were held with affected landowners to further understand and consider the suitability of the new sites proposed. Some light industrial sites that were strongly opposed by landowners in Murchison and Tākaka were removed from PC81. These visits provided an opportunity to discuss specific local issues and concerns directly with the landowners, discuss alternative sites and ensure their perspectives were taken into account. Some site boundaries were also amended following feedback from the community. This included amendments to the central Wakefield proposed intensification (Medium Density Zone Residential sites), to remove areas of high heritage value that contribute to the historic character of Edward Street and Whitby Lane. Sites that were removed following landowner feedback were replaced with alternative sites that were fully assessed as documented elsewhere in this report.

Additionally, meetings with various stakeholders were organized to discuss issues of importance related to the plan change. This included growers, residential/business developers, Ministry of Education, Te Whatu Ora and representatives from community groups. These discussions helped to clarify the potential impacts of the plan change and gather valuable feedback that would inform further refinements.

Prior to notification, in May and early June 2026, pre-notification public meetings and a stakeholder webinar were held to provide information on the notification of PC81 and TRPS C1, explaining the key changes included in the plan changes, and providing information on the streamline planning and submission process.

FDS Community Engagement and Consultation

Most sites proposed in PC81 form part of the adopted FDS. In February 2022, before public consultation commenced on the draft FDS, all landowners of sites proposed in the draft FDS were contacted in writing, explaining that their land was one of the potential future housing sites in the draft strategy. Details were also provided about the consultation process and hearings schedule and opportunities to participate.

Community engagement occurred on the FDS during October 2021 focussing on the proposed outcomes (later changed to objectives during deliberations[4]) and the community was invited to suggest sites for future housing and business development. Full public consultation took place on the draft FDS using the special consultative procedure between March and May 2022 and 568

[3] Draft Change 1 to the TRPS and Draft Plan Change 81 to the TRMP Summary of Feedback available at: Urban Growth Plan Change 81 | Shape Tasman

[4] The use of the term "objectives" in the context of the FDS is distinct and separate from how the same term is used in the RMA and s32 context.

submissions were received. Hearing submitters occurred over four days followed by deliberations and a recommending report from the delegated hearing panel.

Some housing and business sites were proposed via submissions received through the public consultation. For these sites, all landowners and all neighbours likely to be affected by such a development were contacted and their views on the proposal were included within the officers' deliberations report to the FDS Subcommittee. See: https://tasman.infocouncil.biz/Open/2022/05/SH_20220531_ATT_4260_EXCLUDED.PDF

In addition, any new sites were provided to ngā iwi for comment.

Māpua Masterplan Community Engagement and Consultation

Some sites in Māpua are currently already zoned for urban purposes, but with a deferral awaiting the necessary infrastructure. Sufficient infrastructure for some development is now available meaning that the deferral is no longer necessary. To achieve the objectives of the FDS and PC81 it is appropriate that a higher level of density be achieved in the existing zoned areas (not part of the FDS). The Māpua sites were added to PC81 at the notification stage following the conclusion of the MMP in August 2025.

The development of the MMP involved multiple rounds of community engagement culminating in public consultation, submissions and hearings and deliberations under the Local Government Act. Key stakeholders were also consulted as part of the MMP development including NZTA- Waka Kotahi, Network Tasman and the Ministry of Education.

Engagement and consultation with stakeholders, iwi and the community indicated a desire to manage growth in a way that preserves the existing character and natural environment of Māpua, while also accommodating a mixture of densities so people have housing choices. There was also a clear preference for enhancing public open space and recreational linkages. This resulted in the development of OSPs with requirements such as 'no build zones' and indicative reserves and active recreational links and the inclusion of a medium density areas with provisions that provide for a mixture of housing densities. More information about the MMP process and community feedback can be found in Māpua Masterplan | Shape Tasman.

Ngā Iwi involvement in the FDS

Engagement with ngā iwi and hapū commenced early in the FDS process in March 2021, and hui were held from September 2021. Pages 39-40 of the FDS technical report (FDS 2022 - 2052 | Tasman District Council) list all hui held. Ngā iwi o Te Tauihu o Te Waka a Māui were all contacted and invited to participate in the process. Manawhenua Ki Mohua, Ngāi Tahu, Ngāti Waewae, Te Āwhina Marae, Onetahua Marae and Whakatū Marae were also contacted. Involvement of individual iwi varied according to available capacity but overall good participation was secured.

Some iwi submitted on the FDS (Ngāti Apa, Te Ātiawa) and commercial entities Ngāti Rārua Atiawa Iwi Trust and Wakatū Incorporation. All iwi had been invited to or attended numerous hui on the draft FDS and therefore the number of submissions from iwi was low as anticipated.

The FDS Subcommittee which heard and deliberated on submissions included Ms Ina Kara-France as a representative of ngā iwi o Te Tauihu o Te Waka a Māui. Ms Kara France received unanimous support from the chairs of the eight iwi of Te Tauihu.

The adopted FDS includes a statement of iwi and hapū values and aspirations which were drafted by a number of ngā iwi and hapū including Ngāti Apa ki te Rā Tō, Te Ātiawa, Ngāti Rārua, Ngāti Tama and Rangitāne o Wairau. Whanau from Te Awhina Marae also contributed and the drafts were

circulated to all iwi for contributions. Figure 3 below shows that these values include partnership between Tāngata Whenua and Councils, working in a Te Tiriti o Waitangi partnership to achieve their shared goals under the FDS.

Given ngā iwi were extensively involved in the preparation of the FDS, the sites proposed in PC81 are not a surprise. For those sites not forming part of the FDS, proposed in PC81, ngā iwi have been consulted on them – see below.

A very short time before the public notification of this plan change, a new NES-P was gazetted by Government. Ngā iwi were provided with recommended changes to PC81 resulting from the NES-P.

4 IWI AND HAPŪ VALUES AND ASPIRATIONS

The NPSUD requires the FDS to include a statement of hapū and iwi values and aspirations for urban development. This statement is shown below in Figure 1.

There is not full consensus amongst iwi and hapū on this statement and it does not represent a completely shared view of whānau, hapū and iwi.

Nevertheless, the statement has been integral to the development of FDS objectives and the overall strategy. A number of iwi and hapū participants have refined the statement.

Figure 1. Statement of iwi and hapū aspirations

Figure 2 – Iwi and hapū values and aspirations FDS (page 6)

3.3 Ngā iwi engagement

The Minister directed engagement and consultation with ngā iwi. Most of that consultation occurred prior to the Ministers approval of the process, as described below.

Engagement in PC81

In accordance with Schedule 1, clauses 1A, 3(1)(d), 3B, 4A, and s 32(4A) requirements of the RMA, hui with ngā iwi concerning TRPS C1 and PC81 commenced in July 2024.

On the 30th July 2024 a hui was held with ngā iwi outlining the proposals for both the TRMP and TRPS and the sites concerned. Ngā taiao kaimahi attended from Manawhenua Ki Mohua, Ngāti Kuia, Ngāti Rārua, Ngāti Tama, Ngāti Wae Wae, Te Ātiawa and Ngāti Koata. During that hui, questions were asked about specific sites and the proposals for those sites; whether wildfire risk had been considered in the evaluation of the sites; whether the proposals had been assessed against section 6 of the RMA (matters of national importance); and the relationship of this plan change to other projects currently being undertaken by the environment policy team.

Since the majority of the sites proposed are adopted FDS sites, the above queries have mostly been previously assessed. For example on wild fire risk, of the sites forming part of PC81, the sites in the Motueka Valley (Moutere) and St Arnaud potentially pose the most risk. Fire risk was evaluated and road layout will be important providing people will a choice of egress and fire breaks around the houses will need to be built into the design.

After a period of time to allow ngā iwi to consider the proposals, a second hui was held on 30 Sept 2024. Ngā taiao kaimahi attended from Ngāti Tama, Ngāti Kuia, Manawhenua Ki Mohua and Te Rūnanga o Toa Rangatira. The purpose of this hui was to obtain feedback on ngā iwi's places of significance to Māori for the sites being rezoned through PC81. Feedback was received on:

- concerns over potential discharges from industrial development
- avoiding areas for housing intensification that are prone to long term flood risk and three water servicing demands
- opportunities for papakāinga development
- wastewater treatment plant capacity for medium density development in Richmond and residential development in Tākaka
- the desire to be involved in a new definition for papakāinga in the TRMP

Following this feedback resultant changes were made to the boundary of site T-140a and T-140b to avoid potential stormwater discharges from a future industrial development into a stream and wetland. Also additional sites were proposed for papakāinga and consultants were appointed to provide some context for the new papakāinga provisions.

Ngāti Waewae provided separate feedback on the proposed Murchison sites related to infrastructure servicing of the commercial and industrial sites. Officers responded with reassurances that infrastructure capacity exists or is planned. Separate hui were held with Ngāti Rārua and Te Ātiawa.

Details of the sites in Motueka were provided to Ngāti Rārua who undertook a further check of proximity to any cultural heritage sites of significance. Following the hui with Te Ātiawa, further information was provided on a comparison between the FDS site and the PC81 site boundaries, as well as previous notes from hui on the FDS. Ngāti Rārua did not have any concerns over the sites proposed in PC81 but suggested some further due diligence on some of the Motueka sites.

On 5th February 2025 a hui was held with ngā iwi on the papakāinga provision update as part of PC81. Ngā taiao kaimahi attended from Manawhenua Ki Mohua, Ngāti Rārua, Ngāti Tama, Ngāti Waewae, Te Ātiawa, Ngāti Koata and Whakarewa Trust. A detailed discussion was held on the different potential definitions of papakāinga, the options for updating the TRMP with provisions and rezoning and better enabling papakāinga generally. The feedback centred on introducing new objectives, policies and rules specific to papakāinga development, together with a new definition.

Ngā iwi felt they needed more time however to collaborate on the draft changes to the TRMP for papakāinga and staff agreed to recommend to Council that release of the new papakāinga provisions would be delayed until notification of the plan change later in 2025.

Feedback from ngā iwi throughout the engagement process has been clear and consistent: the current papakāinga provisions in the TRMP are insufficient and create significant barriers for tāngata whenua seeking to develop housing on their ancestral land. Iwi representatives have described the existing rules as overly complex, restrictive, and not fit for purpose—particularly for land that does not meet narrow definitions of Māori land under national policy. As a result, it is often very difficult, time-consuming, and costly for whānau and iwi organisations to obtain resource consent for papakāinga development. This has led to frustration and a sense that the planning framework does not adequately support Māori housing aspirations or give effect to Treaty principles. The new provisions in PC81 are a direct response to this feedback, aiming to provide a more enabling, streamlined, and culturally appropriate pathway for papakāinga development across a wider range of land holdings.

As a result of direction from Council that the papakāinga provisions should form part of the public engagement on draft PC81 in March-May 2025, a papakāinga self-nominated working group was quickly established in March 2025 to complete drafting of the papakāinga provisions. Ngā taiao kaimahi from Te Ātiawa, Ngāti Tama, Manawhenua Ki Mohua, Ngāti Toa, Whakarewa Trust and Ngāti Rārua formed the papakāinga working group. Three hui were held in March and a hui towards the end of March culminated in the working group reporting back to the wider iwi group, just prior to the engagement period on PC81 commencing. The improved papakāinga provisions in the TRMP therefore formed part of the public engagement on PC81.

In early 2025, central government indicated its intention to promulgate a National Environmental Standard (NES) for papakāinga. This forthcoming regulation, aimed at setting national rules for papakāinga development, would potentially render local plan changes redundant. Consequently, the working group's efforts were temporarily paused awaiting further consultation on the NES. However, following the consultation, the mahi of the wider iwi group resumed, after the group agreed that the provisions of the consultation draft of the NES for papakāinga would not sufficiently provide for the aspirations of ngā iwi due the narrow definition of Māori Ancestral Land not being applicable to a substantial portion of ngā iwi land holdings in the region.

The last wider iwi group hui in late July 2025 agreed that PC81 provisions should adopt and be at least as enabling as the provisions included in the draft NES, while removing any additional barriers to papakāinga development the NES was likely to introduce based on the definitions included in the NES. The draft NES is expected to enable this because the draft NES identifies that plans may be more lenient or enabling than the NES.

Council has considered and incorporated advice received from ngā iwi throughout the development of PC81. That advice from iwi informed:

- further consideration of the culturally significant sites and values by certain iwi (following the consideration of the same sites for the FDS)
- the formation of rezoning proposals for certain sites for papakāinga
- the development of proposed provisions in the TRMP, including definitions, objectives, policies and rules in relation to papakāinga

Appendix 13 provides a more detailed account of the engagement undertaken with ngā iwi, including the advice received, and how the draft PC81 responded to that advice, consistent with s 32(4A) of the RMA.

Prior to notification, (in May 2026) iwi hui were held to explain the plan change including the proposed PC81 papakainga provisions, the streamline planning and submission process. The National Environmental Standards for Papakainga (2026) was released in early June and was discussed with iwi. Iwi feedback highlighted that the provisions included within PC81 were supported. No changes were made to the proposed PC81 provisions following the release of the National Environmental Standards for Papakainga 2026.

Māpua Masterplan – Ngā iwi Engagement

Ngā iwi involvement in the MMP included participation in multiple hui and providing representation at Council workshops and community engagement events. In collaboration with ngā iwi, a video on the significance of Māpua to ngā iwi and posters on ngā iwi background, Te Ao Māori Values and Visions and archaeological evidence were included with the public consultation material. A submission in support of the MMP was received from Ngāti Rarua.

A hui was held with ngā iwi on the 26 June 2025 to discuss the inclusion of Māpua into PC81. The implementation of the MMP through PC81 was discussed including the proposed changes and the existing TRMP Māpua Cultural Heritage Precinct. Advice was sought from iwi on whether they would like updated Māpua cultural heritage spatial layers (and provisions) included in PC81. Feedback supported waiting for a district wide change to cultural heritage spatial layers and provisions through a Sites and Areas of Significance to Māori Plan Change. A key change identified was the rezoning approach for sites T-238b and T-238c.

Feedback to the provisions being introduced through PC81 and applying to proposed Māpua Zones was received through engagement of the wider PC81 material.

4. What are the Key Resource Management Issues?

Section 4.1 identifies the key resource management issues relevant to PC81. Identifying these issues provides the foundation for the s 32 evaluation by establishing the planning problems requiring intervention. These matters inform the subsequent assessment of options and the evaluation of whether the proposed objectives and provisions are the most appropriate way to achieve the purpose of the Act in accordance with s 32 RMA.

Section 4.2 identifies the outcomes sought in response to the resource management issues identified in section 4.1.

4.1 Resource Management Issues

Section 2 above sets out the key reasons for PC81, many of which relate to giving effect to the NPS-UD and TRPS and having regard to Council's adopted FDS, MMP and TRPS C1.

The key resource management issues PC81 seeks to address are:

- a shortfall of capacity and a lack of diversity in housing choice e.g. small, attached dwellings and unmet demand for housing for Māori (papakāinga) in the urban environment (Richmond, Brightwater, Wakefield, Māpua and Motueka). The issue of a lack of variety of dwellings also affects some of Tasman's rural environment in places like Tākaka. Additionally, TDC together with NCC has a legal obligation to provide sufficient capacity of the right type of housing land to meet demand within its urban environment, e.g. sufficient denser, attached dwellings whether they be duplexes, townhouses or terraced houses or papakāinga.

- Inefficient use of land where urban expansion is proposed for housing, if the typologies are not sufficiently varied.

- Urban growth and the drive to provide greater housing choice and diversity in well-located areas can lead to more intensive forms of development. This intensification often results in changes to neighbourhood character and amenity, including increased building coverage and height, reduced outdoor living space, and greater proximity between dwellings, which can affect privacy, daylight access, and the availability of parking and storage. These changes create a risk of poor amenity outcomes if not carefully managed.

- As housing densities increase, many developments will provide less on-site parking and reduced space for vehicle access or manoeuvring. This shift, combined with more residents relying on shared or multimodal transport options, places additional pressure on existing transportation networks and can increase the risk of adverse effects such as congestion and safety concerns. These changes highlight the need for Council to adapt transport provisions—such as enabling sites with no on-site parking and supporting high-quality pedestrian and multimodal access—to ensure the TRMP's objective of a safe and efficient transportation network continues to be met.

- The ability to accommodate planned urban growth is constrained by the availability, timing and funding of infrastructure, including three waters, transport and related services. In some locations, existing or planned infrastructure cannot support the full extent of development capacity enabled through zoning within the short to medium term. This creates a need to carefully sequence development, align land use with infrastructure provision, and manage the risk of enabling development in areas where servicing is not yet available. In particular, this raises challenges for ensuring that growth occurs in appropriate locations, maintaining plan integrity, and managing expectations where land is zoned but cannot be fully realised in the medium term.

- Māpua is identified for significant long-term growth through the MMP. In addition to accommodating growth, this reflects the need to respond to long-term coastal hazards and sea level rise, which will progressively constrain development in low-lying areas and require a transition of urban development towards higher, less vulnerable land. However, the availability and timing of infrastructure—particularly water supply and wastewater—limits the ability to realise this growth within the short to medium term. This creates a need to provide for long-term urban development while managing the sequencing of development to align with infrastructure capacity, and to address challenges associated with land being identified for future urban use but not able to be fully developed within the medium term.

- A lack of business land capacity in the Nelson Tasman Urban Environment and some of Tasman's rural environment e.g. Murchison and Tākaka. Within the urban environment more business land is required to be zoned for the future in Brightwater, Wakefield, Māpua and Richmond, also providing for Nelson's business land demands in the medium and long term. Both Councils also have a legal obligation to provide sufficient business land capacity to meet demand within its urban environment.

- The operative TRMP imposes barriers to papakāinga development primarily due to the lack of clear and enabling policy direction. There is no coherent policy pathway for papakāinga development on either papakāinga-zoned land or other zones such as Residential, which creates uncertainty and inconsistency for applicants. In addition, the existing rules are overly complex and lack conciseness, resulting in unnecessary costs and delays. Permitted activities under the current definition of the papakāinga zone are too constrained, and the provisions fail to recognise that papakāinga can occur in urban as well as rural locations. As a result, tāngata whenua are unable to effectively utilise their ancestral land for papakāinga, and the plan does not give effect to national policy direction or local aspirations for Māori housing.

- The TRMP does not currently acknowledge the role or function of existing commercial centres, nor does it identify objectives for the centres, making it difficult for Council to articulate how it may support each centre, or influence change in the role and function of a centre. As Tasman's urban environment grows and changes, the vibrancy and efficiencies of its town centres may be compromised by sprawling or ad hoc commercial developments. This issue has been raised by commissioners at recent private plan change hearings for commercial development round Richmond. Large format retail developments which are enabled by the Mixed Business Zone rules have the potential to undermine existing commercial centres

- The definitions and rules about where seasonal workers can live on farms, orchards and vineyards etc are currently too restrictive and outdated. For example, the rules currently assume that ablution blocks and kitchens will be separate from the accommodation, whereas much modern accommodation is purpose built and combined with facilities. Also, the minimum site area where workers' accommodation can be located in rural zones is too large and the activity status is currently too restrictive for smaller seasonal worker accommodation blocks (refer Appendix 15).

4.2 Outcomes sought

This change to the TRMP seeks the following outcomes which respond to the identified resource management issues above:

1. **Sufficient residential and business capacity is provided to meet growth demand**
   Sufficient land and development capacity is provided to meet projected residential and business needs over the short to medium term, consistent with growth expectations and strategic planning for the district.

2. **Urban growth is efficiently accommodated through intensification and consolidation**
   Urban development makes efficient use of land and infrastructure by enabling greater residential density and supporting intensification within existing urban areas.

3. **A diverse range of housing types is enabled to meet community needs**
   A wider variety of housing types, sizes and formats is enabled within urban areas, including addressing identified gaps in housing typologies and supporting housing choice for a range of households.

4. **Urban development occurs in appropriate and well-functioning locations**
   Residential and business growth is directed to appropriate urban locations, having regard to infrastructure capacity, environmental constraints and accessibility to services and amenities.

5. **Urban growth is aligned with infrastructure capacity and delivery**
   Urban development is sequenced and coordinated with the availability and timing of infrastructure, including three waters and transport networks, to ensure that development occurs in locations that can be adequately serviced and avoids premature development in unserviced areas.

6. **Business land and employment opportunities are provided in suitable locations**
   Sufficient and appropriately located commercial and industrial land is provided to support economic growth, employment opportunities and the functioning of the district's urban environment.

7. **A clear hierarchy of commercial centres is established and reinforced**
   The role and function of commercial centres is clearly defined and supported, enabling efficient patterns of commercial development and maintaining the vitality and viability of centres.

8. **Papakāinga and workers' accommodation are enabled through a more flexible framework**
   Provision for papakāinga and workers' accommodation is improved through more enabling and responsive policy and regulatory approaches, supporting Māori housing outcomes and rural productivity.

9. **Urban development supports well-designed and liveable environments**
   Urban growth is supported by design outcomes that promote amenity, functionality and liveability, while accommodating change associated with increased densities.

10. **Long-term growth is provided for while managing infrastructure constraints in Māpua**
    In Māpua, urban growth is managed to provide for the long-term development identified in the MMP, while recognising that infrastructure capacity limits the extent and timing of development in the short to medium term. This includes safeguarding land for future urban development and ensuring that development is staged and aligned with the availability of infrastructure.

These outcomes align well with the objectives of Council's FDS, that guide the nature of the housing and business land capacity to be provided:

Figure 3 FDS' eleven objectives

These objectives for future development were developed with input from iwi and hapū, elected members, infrastructure providers, stakeholders and the community. They were also informed by relevant directions in national policy documents. These overarching objectives direct the outcomes sought from the rezoning of the sites in PC81. Sometimes a balance between competing objectives must be found when considering urban development.

5. What are the Reasonably Practicable Options for Achieving the Objectives?

5.1 Reasonably Practicable Options for achieving the objectives

Section 32(1)(b) of the RMA requires this evaluation report to identify other reasonably practicable options for achieving the objectives. Section 32(6) provides that, for a proposal that contains or states objectives, "objectives" means those objectives. PC81 proposes new and amended objectives within the TRMP. These are summarised in Table 2 (readers are directed to the Schedule of Amendments at Appendix 1 that set out the objectives of PC81 in full):

Table 2 PC81 new and amended TRMP objectives

Change Type	Description
Amended 5.2.2	Change to existing objective: recognising and allowing for amenity values to change over time.
Amended 5.4.2	Consequential change to existing objective refines objective to focus on community activities in urban areas
Amended 6.1.2.1	Update to reflect NPS-UD well-functioning urban environments
New 6.4A.2.1	Sufficient residential capacity to meet demand in the urban environment and rural centres
New 6.4A.2.2	Intensification achieves a variety of housing types and sizes
Amended 6.6.2.2	To refer to a commercial environment (rather than business environment) being a high quality and high amenity environment with minimal environmental effects
New 6.6.2.3	A supply of suitably located commercial land to provide for the medium to long-term needs of the Tasman and Nelson region (an existing similar objective already exists in the TRMP on industrial land – 6.5.2.2 – amended by plan change 10)
New 6.6.2.4	An established hierarchy of existing commercial centres that provides a focus for retail, commercial, community and entertainment activities
Amended 6.7.2	Updated to recognise the character of both urban and rural centres
New 10A.2.1	Papakāinga development is enabled as a taonga that: (a) empowers and enables tāngata whenua to live on their ancestral land; (b) sustains their culture, traditions, and connection to place; and (c) supports their social, economic, and cultural wellbeing in accordance with tikanga Māori.
New 10A.2.2	Tangata whenua are supported to exercise rangatiratanga over the development and use of their ancestral land through papakāinga that reflect their aspirations, tikanga and values.
Amended 11.1.2	Updated to ensure transportation system is fully integrated and supports multi-modal travel

Proposed new and amended objectives are assessed in more detail in Section 9 of this report. Additionally, they are supported by a range of technical evidence provided in the Appendices.

Three high level and broad options were considered for achieving the objectives of PC81 and TRPS C1. Tables outlining the option assessment to determine the effectiveness and efficiency of the provisions in achieving the objectives are set out in section 10.0 of this report. This analysis is grouped into three categories:

1. Evaluation of provisions in achieving the land for residential activities objectives
2. Evaluation of provisions in achieving the land for commercial activities objectives

3. Evaluation of provisions in achieving the papakāinga development objectives

While the need to give effect to national direction, including the NPS-UD, constrains the range of available options, Council nevertheless considered three reasonably practicable options, as follows:

Option (a)

This option involves introducing a coordinated suite of new and amended provisions into the TRMP. This includes new and amended objectives, policies, rules, and zoning changes to give effect to the NPS-UD and TRPS, and have regard to TRPS C1 and the FDS (and the Māpua Masterplan where relevant).

The overall structure of the TRMP is retained, but its content is updated to respond to identified issues, including housing capacity, housing choice, business land supply, papakāinga development, and the integration of growth with infrastructure.

Option (b)

This option relies on the existing TRMP objectives, policies, zoning, and rules to manage future growth.

While this option avoids regulatory change, it does not address identified issues relating to insufficient development capacity, limited housing choice, barriers to development (including papakāinga), or outdated planning provisions. It would not fully implement national and regional planning direction or respond to the strategic approach established through the FDS.

Option (c)

This option involves amending the TRMP to introduce new or amended objectives and policies, with fewer provisions and less prescription than Option (a). It may include limited zoning changes but would generally rely on the existing TRMP framework for implementation.

While this option signals a shift in direction and provides some improvement on the status quo, it does not provide a comprehensive or integrated framework. As a result, it is less effective in addressing the identified issues or delivering the full range of intended development outcomes.

These options form part of the evaluation of the approach to this topic. Section 10 below provides the analysis of these options and arrives at the preferred option.

5.2 Options for proposed zoned land in PC81

The rezoning of land is a method by which to apply objectives, policies and rules to new areas of land. This is a component of Option A above (Introduce a suite of provisions).

An assessment of the issues relevant to the proposed zoning of most of the sites via PC81 were originally assessed during preparation of the FDS, using a multi criteria analysis.

The full details of the methodology of the FDS is included in Appendix 22, in terms of selecting a spatial growth pattern and assessment of individual sites. This provides an assessment of PC81 sites where they were identified as part of the FDS process. However, not all proposed sites of PC81 were identified and assessed through the FDS and this is addressed below.

Excluding Māpua, sites not forming part of the adopted FDS comprise:

- two sites recently proposed by ngā iwi for papakāinga (T-227, T-226)
- two sites with legacy zoning issues (T-223, T-232)
- three new sites in Tākaka proposed for light industrial due to the original FDS site proving unsuitable (T-228, T-229, T-230)

- one new site in Murchison T-234 due to the original site proving unfeasible during the engagement on PC81

These sites have been assessed against the same criteria as used for the FDS and have been considered by staff as being suitable for inclusion to meet the outcomes of PC81.

In Māpua, following the recent adoption of the MMP, 32 sites are proposed for rezoning, six of which are FDS sites and the others are currently zoned deferred or zoned for a different destination zone. The deferred sites which have a destination zone of urban have been through an assessment for their suitability for urban purposes as part of the deferred zoning requirements.

Appendix 8 provides a memorandum from Cam Wallace of Barker Associates, which reviews the scoring of any new or amended sites proposed in PC81, that were not part of the adopted FDS. The additional sites were reviewed in a manner consistent with the development of the FDS and its overall strategy for future urban growth as it relates to Tasman.

The scoring was produced following recent assessments of new sites or amended FDS sites against the 21 criteria. Except for site T-226 (papakāinga Stringer Road, Redwood Valley) and T-238 (33/35 Higgs Road) all the new sites score consistent or better than existing FDS sites.

Site T-226 does not face any serious constraints, but it performs poorly when considered against the wider growth strategy of the FDS. However, since this is a site proposed for papakāinga by ngā iwi, there are other factors Council must consider and these are explained in section 10 of this report. T-238 is split into medium density residential and rural 1 (T-238c). The Rural 1 component of the site is not considered suitable for urban development because it contains ecological and cultural values. These values have impacted the scoring which was undertaken on the entire T-238 site as residential.

For all sites, including those not in the FDS, a consistent assessment methodology was applied to ensure a robust and fair evaluation.

In terms of the requirements of s 32(1)(b)(i) of the RMA, further analysis of reasonably practicable options for all sites was considered in the Site Assessment Report (Appendix 2). This assessment considered alternative options for the proposed zoning of each location, and assessed relevant ones for each site selected from the following suite of options:

- **Option 1** - Retain the status quo and retain the existing zoning.
- **Option 2** - Rezoning land from its existing zone to a more appropriate zone.
- **Option 3** - Downzoning land from an existing deferred zone that is considered inappropriate for urban use to its underlying (pre-deferral) zoning.
- **Option 4** - Applying or amending spatial layers (other than zones) to sites.

Each site was assessed against detailed information for each area, outlining the planning background, strategic context, servicing and infrastructure requirements, natural hazard constraints, ngā iwi interests, community facilities, productive land status, and ecological values. The options assessment considered these factors and weighed up the benefits and drawbacks of retaining the current zoning and recommending a proposed option.

The preferred zoning option for each site is summarised in Table 7 at section 7.2 of this report.

Māpua sites

In Māpua, a number of zone changes are proposed that are additional to the sites identified in the FDS. These additional sites have primarily arisen through the MMP process, which has informed a series of proposed zone changes largely within the existing urban footprint.

As a first stage of assessment, and for completeness, all Māpua sites proposed through the MMP were assessed against the same FDS multi-criteria assessment framework used during preparation of the FDS. This assessment applied the 21-factor evaluation methodology across all sites. In general, the Māpua sites performed well when compared against FDS sites at a district-wide level (refer Appendix 8).

As a second stage, an options evaluation of long-term growth in Māpua has been undertaken and is included in Appendix 28. This is because Māpua is identified for significant long-term growth through the MMP, however the availability and timing of infrastructure—particularly water supply and wastewater—limits the ability to realise this growth within the short to medium term. In Māpua, the options assessment considers how urban growth is managed to provide for the long-term development identified in the MMP, while recognising that infrastructure capacity limits the extent and timing of development in the short to medium term. This includes safeguarding land for future urban development and ensuring that development is staged and aligned with the availability of infrastructure.

As a third and final stage, a more detailed, site-specific assessment has been undertaken and is documented in the Site Assessment Report (Appendix 2).

This three-stage approach ensured consistency and robustness in how strategic, environmental, infrastructure, transport, cultural, hazard and servicing considerations were evaluated across the Māpua development area. In particular, the assessments identified known and material servicing constraints in Māpua, including limitations and timing challenges associated with water supply, wastewater infrastructure, and elements of the transport network.

These servicing constraints do not affect all sites equally and, in some cases, are not able to be resolved in the short term. An evaluation of the infrastructure requirements for each site is included in the Infrastructure Report in Appendix 3. Accordingly, the Site Assessment Report (Appendix 2) undertakes a detailed evaluation of the available options for managing and responding to these constraints, including infrastructure sequencing, deferred zoning, development staging, and the use of integrated site planning tools.

The combined results of these assessments demonstrate that the majority of the Māpua sites perform comparably to, or better than, sites identified through the FDS when assessed against the same evaluation criteria. Where specific constraints were identified—particularly in relation to water and wastewater servicing capacity or transport —these matters are responded to through the proposed zoning framework, the application of deferred zoning where appropriate, and the requirement for OSPs supported by associated policy direction within Chapter 6.15.

The proposed approach transparently recognizes existing servicing limitations and provides a clear policy and planning framework for how those limitations are to be managed over time, in a manner aligned with both the strategic intent of the FDS and the outcomes of the MMP.

5.3 Preferred Option

As assessed in section 10, Option A is the preferred option because it most effectively and efficiently achieves the proposed objectives.

6. What is the Statutory and Policy Context?

6.1 Introduction

Section 32(1)(a) of the RMA requires an evaluation of the extent to which the objectives of the proposal are the most appropriate way to achieve the purpose of the Act. Section 5 of Part 2 sets out the purpose of the RMA, which is to promote the sustainable management of natural and physical resources. In achieving that purpose, decision-makers must recognise and provide for the matters of national importance identified in s6, have particular regard to other matters referred to in s 7, and take into account the principles of the Treaty of Waitangi under s 8.

Section 72 of the RMA requires territorial authorities to prepare, implement and administer district plans to assist them in carrying out their functions to achieve the purpose of the RMA. PC81 proposes amendments to the TRMP, along with consequential changes to the discharges chapter (Regional Plan). Section 73(1A) enables a district plan to be changed in the manner set out in Schedule 1 of the Act. Section 73(4) requires a local authority to amend a proposed district plan to give effect to a regional policy statement, within any timeframe specified in the statement or as soon as reasonably practicable. In addition, s 74(2) requires a territorial authority, when changing a district plan, to have regard to any proposed regional policy statement. PC81 is proposed in conjunction with TRPS C1.

Under section 75(3)(a) of the RMA, a district plan must give effect to any national policy statement. PC81 has been developed in response to, and to give partial effect to, the NPS-UD, as discussed further at section 6.2.

A territorial authority must exercise its functions under s 31 of the RMA, which include ensuring the establishment, implementation, and review of objectives, policies, and methods to ensure that there is sufficient development capacity in respect of housing and business land to meet the expected demands of the district (s 31(1)(aa)).

The decision of the Supreme Court in *Environmental Defence Society Inc v New Zealand King Salmon Company Limited* [2014] NZSC 38 rejected the reversion to Part 2 through an overall broad judgment of whether a proposal would promote the sustainable management of natural and physical resources under s 5, in favour of recognising that national policy direction cannot be subverted by applying an overall judgement when making lower-order planning instruments. It identified four exceptions where use of the overall broad judgment might be necessary; invalidity of the superior instrument, the national policy statement not 'covering the field', the application of s 8 and its use as an interpretative aid. Thus planning instruments 'cascade', giving substance to the RMA's purpose by identifying objectives, policies, methods and rules with increasing particularity as one moves down the hierarchy. Lower-level planning documents (e.g. plans) can therefore concentrate on giving substance to the provisions of the instruments the next level up in the hierarchy.

The Court's decision reinforces the hierarchy of planning documents required under the RMA and the importance of applying the direction in the higher-level documents to those that follow them. Thus, where there are clear directive higher level planning provisions these will be deemed to be in accordance with Part 2 and there may be no need to further resort to Part 2 provided the proposed lower level provisions "give effect to" the higher level provisions up the 'cascade'.

6.2 Statutory and Policy Framework

This section sets out the statutory and policy framework relevant to this plan change. These instruments have been used to inform and guide Council's assessment of the proposal and the reasonably practicable options, and to determine the most appropriate approach under section 32 of the Act.

Resource Management Act 1991 and national direction

Further to the discussion in section 6.1, and the Supreme Court decision in Environmental Defence Society Inc v New Zealand King Salmon Company Limited [2014] NZSC 38, this plan change sits within a hierarchy or "cascade" of planning documents. PC81 implements national direction, including the National Policy Statement on Urban Development (NPS-UD), and gives effect to, or has regard to, other national policy statements and national environmental standards.

The principles of the Treaty of Waitangi (Te Tiriti o Waitangi) have been taken into account and development of the plan change has been undertaken alongside ngā iwi. Section 3.3 above lists the engagement with ngā iwi to date and feedback received has been taken into account during the development of this Plan Change. As such it is considered that the principles of the Treaty of Waitangi have been taken into account.

These national planning instruments have gone through their statutory formulation processes and can be assumed to give effect to Part 2 of the RMA. Consistent with the King Salmon decision, the focus of PC81 is therefore on giving effect to that higher-level direction rather than undertaking a general overall broad judgement under Part 2.

Section 74 of the RMA requires a district plan change to be prepared in accordance with national policy statements, the New Zealand Coastal Policy Statement (NZCPS), and national planning standards, as well as relevant regulations. The relevant national instruments are set out below.

National Policy Statement on Urban Development 2020

The NPS-UD states objectives and policies for matters of national significance relevant to achieving the purpose of the RMA (section 45). It includes eight objectives and eleven policies intended to guide urban planning in a way that:

- achieves well-functioning urban environments
- provides for competitive land and development markets to accommodate expected demand for housing and business land
- supports a range of housing typologies
- provides for integration between infrastructure funding and delivery and land use
- allows urban environments to respond to change over time
- takes into account the principles of Te Tiriti o Waitangi
- supports reductions in greenhouse gases and resilience to climate change

The NPS-UD also requires Tier 2 authorities to prepare a Future Development Strategy (FDS), with clause 3.13 setting out its purpose, including promoting long-term strategic planning, achieving well-functioning urban environments, and providing sufficient development capacity over a 30-year period.

PC81 gives effect to the relevant objectives and policies of the NPS-UD to at least a partial degree. Neither C1 nor PC81 are contrary to the NPS-UD, although PC81 does not fully provide development capacity as required under Policy 2. Further information on implementation is provided in Appendix 20.

The objectives and policies of particular relevance to PC81 include Objectives 1–6 and 8, and Policies 1, 2, 5, 6, 7 and 9, which collectively direct the provision of sufficient development capacity, enable intensification, recognise changing amenity values, and require integration with infrastructure and engagement with iwi.

PC81 responds to this direction by providing plan-enabled urban development capacity, enabling intensification and housing choice, and supporting well-functioning urban environments.

Other relevant national policy statements

National Policy Statement for Freshwater Management (NPS-FM)
The NPS-FM establishes Te Mana o te Wai as the fundamental concept for freshwater management, including a hierarchy of obligations prioritising the health of water bodies and ecosystems, followed by human health needs, and then social, economic and cultural wellbeing.

Sites proposed in PC81 have been assessed for effects on freshwater values, including groundwater recharge, riparian function, habitat, and mahinga kai. Where adverse effects could not be appropriately mitigated consistent with Te Mana o te Wai, sites have not been progressed.

National Policy Statement for Natural Hazards (NPS-NH)
The NPS-NH, which came into force in January 2026, provides national direction to ensure that natural hazard risks are managed consistently and proportionately across the country. It seeks to ensure new development is not located in areas where there is major danger to life or property. Key requirements of the NPS-NH include:

- A standardised risk matrix which is to be used to assess risk based on both the likelihood of a hazard and the consequence for life and property.
- Risk management is to be scaled to the level of risk identified, with high-risk areas requiring robust technical assessment.
- A clear requirement that proposed development assessed as having a very high risk, must avoid that risk.
- Requirement risks must be assessed considering the impacts of climate change over a minimum timeframe of 100 years.

The proposed sites being rezoned as part of PC81 have been assessed against the NPS-NH risk matrix. A summary of the hazard assessments for each PC81 site can be found in Appendix 2, and the full NPS-NH risk matrix assessments and methodology used can be found in Appendix 24.

National Policy Statement on Highly Productive Land (NPS-HPL)
The NPS-HPL became operative in October 2022, with the latest amendments made by the Minister for the Environment becoming operative on 16 January 2026. It seeks to ensure that the most favourable soils for food and production are protected now and for future generations. Policy 3.6 of the NPS-HPL provides that HPL can be rezoned for urban use subject to certain tests. Those tests include:

- the land is required to provide sufficient development capacity to meet demand as required by the NPS-UD
- there are no other reasonably practicable options to meet demand while achieving a well-functioning urban environment
- the benefits of re-zoning the land outweigh the costs of the loss of the HPL

Amendments to the NPS-HPL that became operative on 16 January 2026 mean that LUC3 classed land can be rezoned for urban purposes without having to meet the requirements in Policy 3.6 of the NPS-HPL.

In assessing the sites, those that meet the NPS-HPL definition of HPL and are LUC1 and LUC 2 land (two sites located in Motueka Valley), are considered to meet the criteria in Policy 3.6 of the NPS-HPL. All productive land considerations have been traversed through the FDS, the HBA and the analysis that informs this plan change.

The NPS definition of "urban" excludes Māori Purpose Zones, which pursuant to the directions in the NPS-HPL that a zone is a reference to the nearest equivalent zone, is the equivalent of the Papakainga Zone. Therefore, the NPS-HPL does not apply to the rezoning of HPL where that rezoning is to a Papakainga Zone. This consideration is relevant to site T-17b where part of the land is LUC1.

National Policy Statement for Infrastructure (NPS-I)
The NPS-I provides national direction to enable, integrate and protect infrastructure while managing its effects, and to ensure that infrastructure is planned and provided in a timely, coordinated and efficient manner.

PC81 gives effect to this direction by aligning urban growth locations with infrastructure provision, including through the use of deferred zoning, Outline Spatial Plans (OSPs), and supporting infrastructure policies. These provisions ensure development is sequenced with the availability of servicing, consistent with the NPS-I's emphasis on integrated land use and infrastructure planning.

Policies 10 and 11 of the NPS-I are particularly relevant in managing reverse sensitivity and cross-boundary effects. PC81 responds by incorporating provisions addressing infrastructure interfaces, including road noise and transport effects, ensuring that intensified residential development does not compromise the operation of key infrastructure while still enabling growth.

New Zealand Coastal Policy Statement

The NZCPS directs the management of the coastal environment and must be given effect to under the RMA. It provides specific direction on preserving natural character, protecting natural features and landscapes, managing coastal hazards, and enabling appropriate subdivision, use, and development within the coastal environment.

The NZCPS is particularly relevant to PC81 in relation to areas within or influenced by the coastal environment. In Māpua, Policy 25 is of particular importance, and PC81 responds by ensuring that land use and development is appropriately located and managed having regard to coastal hazard risk (including inundation and sea level rise), natural character, and amenity values. This includes avoiding or limiting development in areas subject to significant coastal hazard risk, directing growth to more suitable locations, and supporting integrated land use and infrastructure planning in coastal settlements.

National environmental standards

NES for Assessing and Managing Contaminants in Soil (NES-CS)
The NESCS is a nationally consistent set of planning controls and soil contaminant values. It ensures that land affected by contaminants in soil is appropriately identified and assessed before it is developed and if necessary the land is remediated or the contaminants contained to make the land safe for human use. This NESCS is a consideration that will be addressed at consent stage, as if land is contaminated it will need remediation.

National Environmental Standards for Freshwater (NES-F)
The NES-F is a nationally consistent set of regulations designed to protect and restore freshwater bodies. It sets out technical standards and specific requirements for activities that pose a risk to freshwater health, such as the reclamation or drainage of natural wetlands and the placement of in-stream structures. Sites proposed for rezoning as part of PC81 have been assessed at a high level for the potential opportunities and risks to freshwater bodies, as detailed in Appendix 2. The NES-F will be considered and addressed in detail at the consent stage, if a proposed development affects a natural wetland or requires significant earthworks near water bodies.

National Environmental Standards for Papakāinga (NES-P)
The NES-P has only recently been gazetted and sets consistent rules for papakāinga. The NES-P

identifies that plans can be more enabling. Therefore the work that has been done on objectives, policies and rules has been retained in PC81.

National Planning Standards

The National Planning Standards have been reviewed to inform the commercial centre hierarchy provisions. The zone names (e.g. Metropolitan Centre Zone, neighbourhood centre zone) are used in the hierarchy but PC81 does not change the zone to the NPS zone, it retains the existing zone. The new resource management plan that will eventually replace the TRMP will update the zones in line with the National Planning Standards.

Tasman Regional Policy Statement

PC81 must give effect to the operative Tasman Regional Policy Statement (TRPS) under section 75(3)(c) of the RMA, and section 73(4) requires this to occur as soon as reasonably practicable.

The TRPS provides the overarching regional policy framework for the sustainable management of natural and physical resources in the Tasman District, including urban development, infrastructure, natural hazards, and the protection of environmental and cultural values. It includes objectives, policies and methods relevant to PC81 in terms of:

- providing for sufficient residential and business land capacity
- avoiding, remedying, or mitigating the adverse effects of urban development
- ensuring the efficient use and development of resources
- maintaining economic and social wellbeing through sustainable use of resources
- protecting and enhancing significant natural, heritage and cultural values
- protecting productive land
- managing flood hazard and stormwater
- providing adequate reserves and conserving heritage values
- enabling compact density development in identified areas

PC81 gives effect to this framework by:

- enabling sufficient development capacity
- directing growth to appropriate locations
- integrating land use with infrastructure capacity
- managing the effects of urban development on environmental and community values

Proposed Tasman Regional Policy Statement Change 1

PC81 has also been developed having regard to Proposed TRPS Change 1 (TRPS C1), which updates the regional policy framework to give effect to national direction, particularly the National Policy Statement on Urban Development. The proposed changes were subject to public engagement between March and May 2025, with ongoing hui with ngā iwi from July 2024.

Relevant new and amended objectives in TRPS C1 include:

- Objective 2A, which provides for Tasman's contribution to a well-functioning Nelson Tasman urban environment

- Objectives 5.1A–C, which:
    - require sufficient housing and business land capacity using housing bottom lines
    - provide for a range of housing types, including medium density development and papakāinga
    - provide for planned urban form while enabling consideration of out-of-sequence proposals that deliver significant development capacity
- Objective 5.5, which recognises that amenity values in areas planned for intensification will change over time

PC81 has regard to these proposed objectives by:

- providing objectives, policies and methods that enable Tasman to contribute to a well-functioning urban environment
- establishing zoning, including the Medium Density Residential Zone (MDRZ), and supporting provisions to deliver sufficient residential and business capacity over the short to medium term
- enabling a wider range of housing types, including more intensive forms of development in appropriate locations
- recognising that amenity values will evolve in intensification areas
- providing for papakāinga opportunities to enable tāngata whenua to develop and use their land
- incorporating provisions that support integrated transport and land use outcomes, including reducing reliance on private vehicles and supporting future transport modes

PC81 also anticipates the strategic direction in TRPS C1 by enabling development capacity to meet expected demand over the next 10 years, while balancing growth with infrastructure provision, environmental constraints, and community values.

Accordingly, PC81 aligns with, and gives effect to, the operative TRPS, and has had regard to and is consistent with the strategic direction contemplated by TRPS C1, which itself has been developed to give effect to the NPS-UD.

Nelson Tasman Future Development Strategy

The NPS-UD requires Tier 2 authorities to prepare an FDS and have regard to it (clause 3.17). The Nelson Tasman FDS 2022–2052 provides the long-term spatial strategy for growth.

The FDS promotes consolidated residential and business growth along key corridors and in identified settlements. PC81 has had regard to the FDS by:

- prioritising identified urban centres for intensification and greenfield expansion
- supporting consolidation of main centres through a centres hierarchy
- applying consistent multi-criteria assessment to sites

PC81 is consistent with the spatial strategy of the FDS, and where additional sites are included, they have been assessed using the same methodology.

6.3 Iwi Management Plans

When preparing and changing a district plan, the territorial authority must take into account any relevant iwi planning document where that plan has a bearing on the resource management issues of the district, see s 74(2A).

The following iwi management plans are relevant to this topic. Table 3 below identifies the document and the relevant provisions therein.

Table 3 Iwi Management Plans

Iwi Management Plan	Relevant Provisions	Reason for Relevance
Ngāti Koata Rangitoto ki te Tonga Trust Iwi Management Plan 2002	The Ngāti Koata IMP contains policies on land disturbance from terrestrial development and its potential impact on heritage values, particularly inappropriate earthworks. The plan also identifies issues of concern that include the degradation or destruction of areas of significant flora and fauna through land development, as well as degradation or destruction of the habitats of native fish through the drainage of wetlands, pollution of waterbodies, removal of riparian vegetation and diversion and damming of water	The TRMP includes existing provisions that relate to the relationship between land, water and iwi values and to the maintenance and enhancement of landscape values. The sites proposed for zoning in PC81 were assessed for suitability for development for the FDS against 21 different criteria which include effects on the natural environment. The proposed zoning of the sites has been further evaluated by technical experts, as evidenced in the 'background site assessment' report for PC81 (Appendix 2)
Pakohe Management Plan 2015 –Te Rūnanga O Ngāti Kuia 2015	The purpose of this plan is to maintain whakapapa and historical connections to Pakohe (rock that may contain Argillite), for current and future generations.	The Plan Change is unlikely to affect Ngāti Kuia's ability to maintain a connection to Pakohe. However ongoing consideration is being given to managing adverse effects on sites of cultural heritage significance as part of the plan change process.
Ngāti Tama ki Te Waipounamu Trust Environmental Management Plan 2018	This plan contains aspirations on ensuring cultural values are protected in the management of wastewater and ensuring wāhi tapu are resource gathering areas are protected from wastewater contamination. Physical and spiritual degradation of wai (water) and contaminated stormwater run-off are also highlighted as issues. The plan seeks for urban development to be contained within urban zones and productive rural areas to be protected from such development, as well as development to maintain and enhance the natural environment.	The 'background site assessment' report provides analysis on the wastewater and stormwater requirements for each site, to ensure the surrounding environment is not degraded. Similar to Ngāti Tama's EMP, the FDS identifies the urban environment of Tasman for accommodating the bulk of the future growth in the District. Use of highly productive land was minimised in the FDS and hence PC81 and this is addressed in section 6.3 Table 1 above noting the Government's proposed change to the NPS HPL to exclude LUC3 land. The statement of iwi and hapū values in the FDS similarly identified its overarching aspiration as *"all change must be sustainable to revive and enhance Te Taiao/the natural world."* This influenced one of the 21 assessment criteria, against which potential sites were assessed to cover

		the impact on life sustaining quality of natural resources and ecosystems.
Ngāti Rārua Environmental Strategy 2021	The strategy encourages affordable housing options, opposes development in areas of significance to Ngāti Rārua and discourages development within areas of high natural values or on highly productive rural land. Incorporation of cultural values in urban development is supported.	The plan change includes medium density housing proposals on both brownfield and greenfield land, as well as sites for papakāinga, all of which aim to provide more affordable housing in Tasman. The sites have all been assessed thoroughly for cultural heritage significance and this consideration will be ongoing as part of the plan change process.
Te Ātiawa o Te Waka a Māui Iwi Environmental Management Plan	This plan highlights issues including the destruction and/or modification of sacred areas and burial grounds from development. Also the discharge of contaminants into water, affecting the health of the freshwater ecosystems and the drainage of freshwater wetlands resulting in the loss of ecosystems. Policy 2 seeks to ensure a range of desirable housing options, including papakāinga are available.	The sites have all been assessed thoroughly for cultural heritage significance and this consideration will be ongoing as part of the plan change process. The TRMP includes existing provisions that relate to the relationship between land, water and iwi values and to the maintenance and enhancement of landscape values. The sites proposed for zoning in PC81 were assessed for suitability for development for the FDS against 21 different criteria which include effects on the natural environment. The proposed zoning of the sites has been further evaluated by technical experts, as evidenced in the ''background site assessment" report. PC81 includes background assessment of a number of sites proposed for papakāinga zoning.
Ngā Taonga Tuku Iho Ki Whakatu Management Plan 2004	This plan contains a number of policies relating to urban planning and land management, including protecting sacred places from adverse effects of land use, safeguarding indigenous vegetation and promoting the enhancement and restoration of areas with urban development. Pressures on ngā whenua (land) are highlighted from urban development	The TRMP includes existing provisions that relate to the relationship between land, water and iwi values. The sites proposed for zoning in PC81 were assessed for suitability for development for the FDS against 21 different criteria which include effects on the natural environment. The proposed zoning of the sites has been further evaluated by technical experts, as evidenced in the 'background site assessment' report. The sites have all been assessed thoroughly for cultural heritage significance and this consideration will be ongoing as part of the plan change process.
Te Rūnanga a Rangitāne o Wairau – Te Aropipi Taiao Strategy and Iwi	This plan highlights issues, objectives and policies relating to ongoing development and infrastructure and the challenges maintenance and expansion have on waste management,	A full infrastructure assessment has been undertaken to determine which sites being rezoned in PC81 can be serviced now, or, where infrastructure upgrades will be required in the next

Management Plan July 2025	stormwater and energy supply. It also notes adverse effects from erosion and sedimentation to waterways. The plan seeks that the location and design of infrastructure and development needs to be carefully considered to avoid impacts on cultural heritage sites, cultural landscapes, waterways, and te taiao.	10 years to ensure reliable waste and stormwater management. Engagement has been undertaken with Network Tasman Limited, confirming sufficient energy supply for sites being rezoned for rezoning. Existing TRMP provisions will ensure that any future development will be assessed at the resource consent stage to ensure erosion and sedimentation effects to waterways is avoided or mitigated. The sites have all been assessed at a high level to identify potential opportunities and risks that development may have on waterways. The sites have all been assessed thoroughly for cultural heritage significance and this consideration will be ongoing as part of the plan change process.

6.4 Government Policy Statements

Government Policy Statements (GPS) provide high-level direction on national priorities and investment for key sectors, including land transport and housing and urban development. A territorial authority must have regard to these documents in accordance with s 74(2)(b) to the extent that their content has a bearing on resource management issues of the district.

In the context of PC81, these statements are particularly relevant as they shape the statutory and policy environment within which the plan change has been developed. The following table summarises the most pertinent GPS considered in this evaluation, outlining their strategic priorities and the implications for urban growth, infrastructure planning, and housing provision in the Tasman District. Reference to these statements ensures that PC81 is aligned with current government direction and supports integrated, well-functioning urban environments.

Table 4 Government Policy Statements

Document	Relevance
Government Policy Statement on Land Transport June 2024 (GPS-LT)	The Government's four strategic priorities in the GPS-LT) are: (i) economic growth and productivity (ii) increased maintenance and resilience (iii) safety (iv) value for money. The GPS-LT influences decisions on how funding from the National Land Transport Fund (NTLF) is invested. Changes in the NTLF from the 2021-2024 fund has meant funding assumptions made in Council's most recent LTP 2024-2034 need to be reduced in the 2025 Annual Plan, particularly on walking and cycling routes and local road improvements. However, Council's Walking and Cycling Strategy and the Activity Management Plans propose a long-term commitment to completing further improvements and changes to the transport network to support intensification, for example residential

	greenways, speed limit reductions, and high-quality separated cycle lanes. Availability and accessibility of transport infrastructure is considered in amended and proposed objectives in this policy statement change to recognize the role that public and active transport can play. The GPS also reintroduces Roads of National Significance and these include the Hope bypass in Tasman which will be in the vicinity of new growth areas. The Government expects NZTA to prioritise these roads in the development of its National Land Transport Programme. An investment case for the Hope bypass is currently being developed by NZTA.
Government Policy Statement for Housing and Urban Development (GPS-HUD) 2025	The GPS-HUD is focused on ensuring housing availability for New Zealanders. Its short to medium key outcomes are increased system capability to deliver more homes and cost-effective housing support for those who need it. Its long -term outcomes are an adaptive and responsive system; stable affordable and healthy homes; Māori-led housing and thriving and resilient communities. The GPS finds that *"Councils do not always free up enough land for development or plan well for intensification. The infrastructure funding system leaves councils unable to effectively recover infrastructure costs."* The Government's Going for Housing Growth programme is making legislative change to target underlying causes of the housing shortage and support growth – both 'up' within the existing urban area and 'out' into greenfields.

6.5 Other relevant management plans and strategies

In addition to national policy statements and government directions, a range of other management plans and strategies have informed the development of PC81. A territorial authority must have regard to management plans and strategies prepared under other Acts in accordance with s 74(2)(b) to the extent that their content has a bearing on resource management issues of the district.

Management plans and strategies prepared under other Acts are summarised in the Table 4. This provides important context on local and regional priorities, infrastructure planning, transport, climate adaptation, and urban design. By referencing these plans and strategies, the evaluation ensures that PC81 has had regard to these documents.

In addition, PC81 has also considered documents identified as 'other relevant strategies' in Table 5.

Table 5 Relevant Management Plans and Strategies

Relevant plan/strategy	Organisation	Relevance
Nelson Tasman Future Development Strategy	Tasman District Council and Nelson City Council	The FDS informs PC81 on the preferred location of future housing and business sites to accommodate growth, as well as mapped environmental constraints and opportunities and trunk infrastructure requirements to provide for the growth.
Tasman Housing and Business Assessment 2024	Tasman District Council	The HBA is a required under the NPS-UD and sets out the expected demand for housing and business sites over the next 30 years and where the housing and business land capacity will be provided, together with any shortfalls. The sites proposed for rezoning in this plan change are assumed as part of the housing and business

		capacity identified in the HBA 2024, for the next 10 years, with some exceptions with recently added sites to the plan change. Any additional housing land capacity created by rezoning these extra sites will assist somewhat with reducing the shortfall of 362 dwellings in years 4-10 (2028-2034) for Tasman District, identified in the 2024 HBA.
Long Term Plan 2024-2034	Tasman District Council	The LTP provides for the strategic integration of infrastructure with planned housing and business land capacity, informed by the FDS.
Regional Public Transport Plan	Tasman District Council and Nelson City Council	The Plan details the investment programme required to increase the role public transport plays in delivery of a multimodal sustainable transport future for the region. It focuses on delivering a system that builds on the step change that was delivered by the recent introduction of eBus services.
Regional Land Transport Plan 2024-2034	Tasman District Council and Nelson City Council	The Plan sets priorities for state highway and Council transportation activities in a period of continued growth of the region. The key issues over the 10 year period are vehicle usage growth, safety, frequent weather events affecting accessibility, road maintenance being underfunded and impact of vehicle usage on the natural environment.
Aotearoa New Zealand's Emissions Reduction Plan 2022 and National Adaptation Plan 2022	Central Government	These documents work together to achieve a climate-resilient Aotearoa New Zealand. This complements the characteristics of a well-functioning urban environment in the NPS-UD and provisions of this plan change.
Māpua Masterplan 2025	Tasman District Council	The MMP is a comprehensive plan that provides strategic direction on how Māpua will grow and develop over the next 30 years. It guides how growth is to be accommodated in Māpua, and outlines plans for improvements to recreational areas, ecological outcomes, linkages and open space, and infrastructure services.
Other relevant strategies		
Walking and Cycling Strategy 2022	Tasman District Council	Council's Walking and Cycling Strategy and the Activity Management Plans propose a long-term commitment to completing further improvements and changes to the transport network to support intensification, for example residential greenways, speed limit reductions, and high-quality separated cycle lanes. These measures greatly assist intensification of housing in Richmond, Motueka, Brightwater and Wakefield.
Richmond Spatial Plan 2024	Tasman District Council	The Richmond Spatial Plan sets the strategic direction and vision for how growth and development can occur in the town. The Plan sets a framework to enable growth within the existing urban area, while reducing sprawl into the surrounding area.
New Zealand Urban Design Protocol	Ministry for the Environment	The New Zealand Urban Design Protocol (2005) provides a non-statutory national framework for achieving high-quality urban design outcomes in towns and cities. It promotes a coordinated

approach across central and local government, developers and design professionals to create urban environments that are successful, liveable and sustainable. The Protocol identifies a set of key design qualities (the “Seven Cs”), including context, character, connectivity and choice, which underpin good urban form and the relationship between buildings, spaces and people. While it does not have direct legal effect under the RMA, it is relevant to PC81 in guiding the development of provisions that seek to achieve well-functioning urban environments, including through the MDRZ, design matrix and outline spatial plans, which collectively aim to deliver coordinated, integrated and higher-quality built outcomes.

7. What are the Proposed Objectives, Policies and Methods in PC81?

7.1 Overview of Strategic Direction

Section 2.5 above provides a short summary of the proposed changes to the TRMP. The proposed objectives, policies and methods for PC81 are set out here in more depth to provide context for the evaluations that follow in section 9.0 and 10.0.

An evaluation is carried out in Section 10 'Assessment of the efficiency and the effectiveness of the provisions in achieving the objectives' and Section 9 'Assessment of appropriateness of the proposed objectives to achieve the purpose of the Act.' Section 8 'Scale and Significance' evaluates the scale and significance of the topic which establishes the level of evaluation carried out.

7.2 What are the Proposed Objectives, Policies and Methods?

The proposed changes to both the TRMP's and TRPS's objectives, policies and methods are summarised below and included in Appendix 1 (TRMP Schedule of Amendment and Maps). This is because TRPS C1 is proposed concurrently with PC81. Although there are many sites proposed for rezoning, in many cases existing policy and rule frameworks for those zones in the TRMP will be relied upon.

Proposed amendments to Tasman Regional Policy Statement (TRPS C1)

Table 6 Proposed Amendments to the TRPS

Tasman Regional Policy Statement provision	Proposed amendment
Introduction section 1.3	Expansion of 'Council's resource management functions under the RMA' to include amendments to s.30 and s.31 made since the TRPS became operative – concerning providing sufficient development capacity to meet demand. Expansion of issues in the TRPS to reflect the above function required by the RMA. Amendment to existing issue 'maintaining urban amenities and environment quality' to recognize that amenity values in areas planned for intensification develop and change over time, in accordance with the NPS-UD interpretation of amenity values of urban environments.
Interpretation of terms section 2.0	Addition of definitions for tier 2 Local Authority, urban environment, Tasman's urban environment and well -functioning urban environment
General Objective 2A Section 3.0	Remove 'housing bottom lines' currently forming General Objective 2A (and move those to new Urban Development Objective 5.3). Replace with a new General Objective on Tasman contributing to a well-functioning Nelson Tasman urban environment
Urban Development Section 5.1	Update introductory text on population growth and reference to three new issues: • Providing sufficient housing and business land capacity to meet demand in the urban environment • A lack of variety of homes

	• Private plan changes can trigger out of sequence or unanticipated development that may not be consistent with providing a well-functioning urban environment
Urban Development Issues section 5.2	Insertion of the three new issues 5.1A, 5.1B, 5.1C on providing for urban growth and infrastructure, variety of housing and unanticipated or out of sequence, significant urban development capacity Amendment of existing urban development issue 5.1 – 'allocation of high quality peri-urban lands' – to update the benefits of managed urban expansion to horticulture. Also updated to explain the need for managed urban expansion and intensification housing opportunities in Tasman, as well as recognising that amenity values in areas planned for intensification develop and change over time Amendment of existing urban development issue 5.7 – 'maintenance and enhancement of the quality of the urban environment' – to acknowledge the risk that sprawling or ad hoc commercial developments can have adverse effects on the vibrancy and efficiencies of town centres. Also proposes the role and function of town centres (and neighbourhood centres in the larger towns) should be acknowledged.
Urban Development Objectives sections 5.3 and 5.5	Insertion of three new urban development objectives 5.1A, 5.1B, 5.1C on: • Providing sufficient housing and business land capacity to meet demand in the urban environment, using the 'housing bottom lines' • Providing for a range of housing types in the towns, including opportunities for medium density dwellings and papakāinga • Ensuring a planned built urban form while enabling Council to be responsive to unanticipated or out of sequence plan change proposals for urban development, where those proposals would add significant development capacity and contribute to well-functioning urban environments • Amendment of an existing urban development objective 5.5 on urban environmental quality: • To recognize that amenity values of the urban and built form in areas planned for intensification, develop and change over time
Urban Development policies and methods section 5.4	Insertion of three new urban development policies 5.1A, 5.1B and 5.1C and associated methods: • Details of the twelve outcomes sought from new residential and business land capacity, (one of which comprises a range of housing choices), with corresponding methods of implementation • Criteria for 'significant' development capacity proposed in a plan change for urban development, with corresponding methods of implementation • Council's proposed hierarchy of existing commercial centres to provide a focus for retail, commercial, community and entertainment activities that serve the social, cultural, economic and environmental needs of the community, with corresponding methods of implementation. Amendment of an existing urban development policy 5.1 on highly productive land:

- To recognize that amenity values of the urban and built form in areas planned for intensification develop and change over time and
- Recognizing the need to provide sufficient development capacity to meet demand, with corresponding methods of implementation

Proposed amendments to Tasman Resource Management Plan Volume I (PC81)

Below in Table 7 is a summary of the proposed changes of PC81, focussing on the scope and intent of the change. The full schedule of amendments to the TRMP can be found in Appendix 1.

NB. Where objectives and policies are changed or added there are also consequential amendments to the methods of implementation and principal reasons and explanation in the TRMP, these are not listed below, and the Schedule of Amendments should be consulted.

Table 7 Proposed Amendments to the TRMP

Tasman Resource Management Plan Provision	Proposed amendment
Volume 1: Text Part I – Introductory	
Chapter 2 – Meaning of words	Changes to some meaning of words relevant to the plan change
Volume 1: Text Part II: Land	
Chapter 5 – Site Amenity Effects	Amendment to objective 5.2.2 relating to amenity and reflecting national direction on amenity under the NPS-UD Amendments to policies that support objective 5.2.2. Amendment to objective 5.4.2 seeking a wide range of accessible community facilities in urban areas. Amendments proposed to policies on privacy, amenity, daylight, sunlight and outdoor living to recognise that these may develop, change or decrease over time with medium density. Amendment to policies introducing the new MDRZ within existing urban areas and referencing Tasman's urban environment under the NPS-UD.
Chapter 6 – Urban Environment Effects	Key changes: Relocation of some policies within this chapter to a new section 6.4A 'Land for Residential Activities' and relocation of some policies relating to Tākaka and Eastern Golden Bay from general sections to the relevant section 6.11 (Tākaka-Eastern Golden Bay) **Section 6.1.2** Minor amendment to Objective 6.1.2.1 referencing 'well-functioning' urban environments, spaces and networks **New section 6.4A** • A new issue, dressing the need for sufficient housing land capacity in the shared tier 2 urban environment over the long term • two new objectives, • three operative policies relocated from other plan locations • 12 new policies.

The proposed new objectives and policies will:

- provide sufficient residential capacity to meet demand in the urban environment and rural centres
- unlock additional housing capacity through intensification and strategic zoning
- ensure acceptable design outcomes and liveability in medium density environments
- enable the design and development of medium density housing to be led through the land use consent process
- manage subdivision and development to avoid compromising future comprehensive development outcomes
- support the provision and integration of infrastructure and public realm improvements to accommodate growth
- manage environmental effects of development, including road traffic noise, to ensure suitable living environments for future occupants
- provide for a structured approach to development through the use of outline spatial plans and design-based pathways
- enable increased building height and intensity in the commercial and central business zones of Richmond and Motueka, including residential activities above ground floor level

Sections 6.5 Land for industrial activities

Introduces a new policy on providing a suitable supply of industrial land to meet the district's needs in the long term, implementing an existing objective.

Section 6.6 Land for Commercial Activities

two new objectives, an amended objective and several new policies, as well as amendment of and relocation of some policies.

New proposed objectives and policies will:

- Protect town centre vitality by managing where and how commercial development occurs, including a new hierarchy for existing centres in the District based on National Planning Standards Zone names
- Ensure Richmond, Tasman's Metropolitan Centre continues this role for the District as the primary urban centre, including changes to protect town centres from the effects of alternative retail areas
- Ensure growth in the Mixed Business Zone is complementary to the Richmond and Motueka CBD Zones
- Ensure long-term land supply for commercial needs
- Promote efficient infrastructure use and compact urban form
- Support mixed-use, vibrant neighbourhoods
- Section 6.7 on settlement character and design updates references to settlements with 'urban and rural centre' or 'centre'

Section 6.8 Richmond

Minor updates to existing issues and policies as well as several new policies. New policies will:

- Reinforce Richmond's strategic role as the district's primary urban centre
- Protect the CBD's vitality by managing commercial growth in surrounding areas

- Integrate medium density housing into Richmond's urban fabric with supporting infrastructure and amenity
- Enhance liveability through green space including neighbourhood reserves of varying formats and infrastructure planning
- enable taller buildings in the commercial and central business zone of Richmond with residential uses above the ground floor

Section 6.9 Motueka

A new issue: the need to provide a variety of medium density housing options

New policies:

- support taller commercial buildings to enable residential activites
- provide for comprehensive developments

Section 6.10 Tākaka

A new issue and policy:

- the need for a greater variety of dwelling types, including in the MDRZ at Rototai Road, and
- opportunities for residential activities on Motupipi Street, subject to management of flood hazard.

Section 6.15 Māpua

Updated issues recognising demand for higher-density housing within the settlement, alongside acknowledged constraints on growth arising from infrastructure capacity.

These issues specifically identify limitations and timing challenges associated with water supply, wastewater infrastructure, and elements of the transport network, and the need to manage development so growth does not outpace available servicing or undermine environmental and amenity outcomes.

The associated policy framework responds by enabling more comprehensive residential development in appropriate locations, while managing servicing constraints through the zoning and deferred zoning framework, the use of OSPs, and supporting policy direction.

The policies also require sufficient "green" infrastructure—including tree cover, reserves, and active and passive recreation—to support increased density and implement the spatial and urban design outcomes of the MMP, while the detailed assessment of servicing options is addressed in the Site Assessment Report.

Section 6.16 Brightwater

Updated to address flood hazard risk from potential dam break and road noise management for land between Katania Heights and the Brightwater Deviation State Highway. The section now includes amendments to four issues and five policies, as well as a new policy supporting comprehensively designed intensive development in the MDRZ. These changes, as detailed in the Schedule of Amendments (SoA), ensure that development in this area is carefully managed for environmental and infrastructure outcomes, with the latest policy updates and additions clearly identified in the SoA.

Section 6.17 Wakefield

	proposes two new issues and policy on higher density housing options and variety of dwelling sizes and providing those in the MDRZ **Section 6.18 Murchison** proposes a new issue on the need for more suitable light industrial land
Chapter 7 – Rural Environment Effects	**Section 7.1 Effects of Land Fragmentation on Productive Opportunities** Amend an existing policy to enable workers' accommodation in Rural 1 and 2 Zones. **Section 7.2 Provision for Activities other than Plant and Animal Production** Policy to increase protection from wastewater discharges **Section 7.3 Rural residential development in Coastal Tasman Area** new policies enabling workers accommodation
New Chapter 10A- papakāinga development	**New Chapter 10A Papakāinga Development** A significant new chapter in the TRMP, providing guidance for papakāinga development anywhere in the District, filling a current policy gap. It distinguishes between the papakāinga zone and providing for papakāinga development in other zones, aiming to streamline the planning processes and reduce confusion for applicants. It proposes new issues, new objectives and a new policy set. The new objectives enable papakāinga development, in ways that reflect Tāngata whenua's values and support intergenerational wellbeing. The design of papakāinga will be led by Tāngata whenua. The new policies provide for papakāinga development: • Led by tāngata whenua and guided by tikanga Māori and kaupapa Māori • Enabled on land owned by tāngata whenua within the Papakāinga Zone and across a range of residential and rural zones • Supported by Council, including through the preparation of design guides and development plans where desired by tāngata whenua • With scale and design reflecting tāngata whenua aspirations, while recognising site constraints, infrastructure capacity, and the need to manage adverse effects • Enabling a range of residential, social, cultural, educational, recreational, health, temporary and commercial activities that are consistent with kaupapa Māori and appropriate to the papakāinga context • Designed and undertaken to protect and enhance ecological, cultural, and environmental values New methods, reasons and explanations support the provisiosn
Chapter 11 – Land Transport Effects	Section 11.1 Effects on Trasnport Safety and Efficiency Updated to amend Objective 11.1.2 Amendments and additions to policies to strengthen the focus on safe, accessible, healthy and sustainable urban development in the MDRZ by integrating transport planning, reducing reliance on private vehicles, and supporting current and future mobility modes. The new objective and supporting policies reflect the latest recommendations and ensure alignment with best practice for urban intensification.
Chapter 16 General Rules	

Section 16.2 – Transport

Rule 16.2.2.1
update the access rules to better support medium density development and a wider range of transport choices. In the Medium Density Residential Zone, development is no longer required to provide vehicle access to every dwelling, with access instead able to be provided for either micromobility users or vehicles. The changes also introduce specific standards for shared vehicle access, restrict new vehicle crossings on identified roads, and add design requirements for micromobility access where no vehicle access is provided.

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.

Section 16.3 – Subdivision

Section 16.3.3 subdivision in the Residential Zone
proposes removing the outdated provisions tied to the Richmond Intensive Development Area (to be replaced by the proposed MDRZ).

Also places new servicing condition on development in Mapua.

Section 16.3.3A subdivision in the MDRZ

- Introduces a new dedicated subdivision framework for the Medium Density Residential Zone.
- Provides a controlled activity pathway for land use-led subdivision, where lot layout must be based on an approved or concurrent land use consent for the dwellings.
- Provides a controlled activity pathway for vacant allotment subdivision within OSP areas, where subdivision follows the relevant OSP and specified development requirements.
- Requires minimum net residential densities for vacant allotment subdivision, including higher density expectations in the Richmond Intensive Development Precinct.
- Requires subdivision in OSP areas to provide servicing, transport infrastructure, connected roads, reserves and access arrangements consistent with the OSP and Council standards.
- Introduces specific restrictions on road connections to certain roads for identified OSP areas.
- Requires indicative reserve land shown on OSPs to be vested in Council in certain circumstances.
- Includes site-specific provisions for road traffic noise, including acoustic design reports, building platform considerations and noise mitigation where land is near the state highway or within the Road Traffic Noise Overlay.
- Includes site-specific requirements for cultural heritage sites, wāhi tapu, heritage items and protected trees.
- Requires allotments to be of a size and shape that can accommodate a complying dwelling and related standards.

- Introduces specific servicing capacity requirements for Māpua OSP areas, including available Council water and wastewater capacity.
- Provides an extensive set of matters of control/discretion covering urban design, infrastructure integration, transport, open space, stormwater, flooding, landscape treatment, energy efficiency, heritage, cultural values and natural environment effects.
- Places strong emphasis on maintaining the potential for future comprehensive development, including lot size, orientation, servicing and the ability to meet the Medium Density Residential Design Matrix.
- Provides a restricted discretionary activity pathway for subdivision in OSP areas that does not fully comply with the OSP requirements.
- Provides a restricted discretionary activity pathway for vacant allotment subdivision outside OSP areas, subject to minimum site area, density, lot dimensions and stormwater requirements.
- Provides a discretionary activity pathway for other MDRZ subdivision that does not meet the restricted discretionary rules but is still on land over 5000 square metres.
- Provides a non-complying activity status for subdivision that falls outside those pathways.

Section 16.3.4.1 subdivision in business zones
minor changes to standards ensure protection of retail focus of central business areas.
Also places new servicing condition on development in Mapua.

Section 16.3.8 Subdivision in the Rural Residential Zone
amends the subdivision rules for the Rural Residential Zone to introduce site-specific minimum lot sizes for new areas rezoned under PC81. The changes allow for smaller lots in certain locations—particularly in Pangatotora—where this is achievable and appropriate, through a new restricted discretionary activity pathway.

These amendments are designed to provide greater flexibility for subdivision while ensuring that key conditions are met and Council retains oversight of important matters.

Schedules 16.3A, 16.3B, and 16.3C
Updated to ensure consistency with these new provisions and to require consideration of any relevant land use consents for compact, comprehensive, or intensive development.

New Schedule 16.3D
- Introduces 12 outline spatial plans for identified growth areas.
- Establishes outline spatial plans as a structured framework to guide and manage the sustainable development of larger sites and growth areas.
- Supports coordinated land use, infrastructure provision and environmental management.
- Ensures development aligns with the national direction and long-term district planning goals.

- Identifies the context, development considerations and development directions that must be taken into account in resource consent applications.
- Clarifies that the colours in the outline spatial plans do not denote zoning.
- Confirms that the colours instead indicate anticipated land use.
- Provides that the outline spatial plans are to be used alongside the planning maps and zone framework to inform subdivision and land use decisions.

New section 16.14 papakāinga development

- proposes a new rule framework for papakāinga development in zones other than the Papakāinga Zone.
- The new provisions substantially simplify the existing framework, replacing around 29 pages of current rules with 5 pages of rules and a new schedule.
- The new Permitted Activity rule applies in the Residential, Medium Density Residential, Rural 1, Rural 2, Rural 3 and Rural Residential Zones.
- It enables papakāinga development of up to 10 residential units on Māori land across multiple zones.
- The new framework is intended to provide a clearer and more enabling pathway for papakāinga development on ancestral land.
- A new Schedule of papakāinga development standards is proposed to manage matters such as design, amenity, infrastructure and environmental effects.
- Where the permitted standards are not met, the provisions provide a restricted discretionary activity pathway in those same zones.
- Overall, the changes provide a more tailored and streamlined planning framework for papakāinga development while still managing relevant site and environmental effects.

Chapter 17 – Zone rules

Chapter 17 – Zone rules

Throughout chapter 17, for various activity statuses and in all zones, conditions concerning noise generated by the activity have been amended, such that the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, change to Monday to Sunday and including (rather than excluding) public holidays. This is so that Sunday and public holiday noise limits are consistent with NZS6802:2008 and will result in clearer enforceable provisions. Refer Appendix 7 for more information on Noise Limit Changes.

Chapter 17 is also updated with the proposed deletion of the rules on papakāinga development (now in new section 16.4 above in general rules chapter 16) and rules in the now historic Richmond Intensive Development Area.

Section 17.1A MDRZ

Introduces a comprehensive framework for building construction and alteration in the MDRZ.

Standard density residential development is permitted, subject to clear limits on dwelling numbers, height, coverage, setbacks, servicing, and flood risk.

For comprehensive development (two or more dwellings on a site), proposals are assessed as Restricted Discretionary Activities and must achieve a pass score in the Medium Density Design Matrix (Schedule 17.1AA) if not within and OSP area.

The rules are designed to be flexible: if a proposal does not meet all conditions, it remains Restricted Discretionary, with additional matters of discretion applied, rather than escalating to a higher activity status.

Alignment with OSPs is required where applicable.

There is no Discretionary or Non-Complying Activity status for comprehensive development in the MDRZ—applications are managed within the Restricted Discretionary framework, providing clarity and certainty for applicants. These changes, as set out in the Schedule of Amendments (SoA), streamline the consenting process and reinforce quality design and infrastructure outcomes for medium density housing.

Section 17.2 Business Zone rules

Amendments to the Central Business and Commercial Zones, extending the height of buildings in Richmond and Motueka to 14 metres rather than 10 metres, to better provide for town centre living opportunities above ground floor in Richmond and Motueka centres.

includes a new rule for commercial buildings constructed in the area of the Māpua waterfront. This is a change from permitted activity to controlled activity, allowing consideration of design aspects for these buildings to ensure that they achieve the expert design recommendations for the area.

Section 17.3 Mixed business zone rules

changes to retail activity, providing constraints on large format retail activity in the zone (to better implement the urban centres hierarchy). Key changes include limits to the type of activity, floor area and road frontage.

Section 17.4 Industrial Zone rules

new condition on vehicle access to sites west of Main Road Hope, in the vicinity of site T-35 to be rezoned as part of this plan change. New conditions also on vehicle access to the Network Tasman site at 24 Main Road, Hope.

Section 17.5 Rural 1 Zone rules

More flexible but Controlled rules are proposed for workers' accommodation, with minimum site size reduced from 12ha to 5,000 sq m and a maximum occupancy of 35 persons as a controlled activity. New matters of discretion are proposed for workers' accommodation as a Restricted Discretionary Activity.

Outdated site specific provisions relating to Network Tasman's Hope site are deleted. The Network Tasman site is proposed to be zoned Light Industrial as part of PC81, making the existing Schedule for an industrial site in a Rural Zone redundant.

Sections 17.6 and 17.7 Rural 2 and Rural 3 Zone rules

These sections also propose new conditions and matters of control and discretion relating to workers' accommodation, similar to section 17.5.

	Section 17.13 papakainga zone rules enable more flexible permitted activities in the Papakāinga Zone. At least as enabling as NES-P activities not permitted become RDA with new matters discretion and there would be no public notification of consents, but limited notification is still possible. Some new standards are also introduced that did not previously exist on wastewater, potable water and firefighting water. Otherwise the standards are based on existing TRMP rules. **Section 17.14** on Deferred Zone rules amends Schedule 17.14A 'Deferred Zone locations' inserting sites proposed for rezoning as part of PC81 that are deferred for infrastructure or servicing.
Chapter 19- Information requirements	Information required for land use or subdivision consent applications, includes new information requirements. These comprise a completed assessment of the development against the Medium Density Housing Design Matrix in Schedule 17.1AA, reasons why a comprehensive development is not appropriate or achievable for the site, assessments related to maximum possible density and market demand for the size of lots or houses proposed. Amendments to this chapter also reflect Mixed Business Zone changes.
Volume 1 - Part II Appendix 2 Urban Design Guide which applies to Development Areas in Tasman.	Appendix 2 to Volume 1 of the TRMP contains the Urban Design Guide which has minor consequential updates
Volume 1 - Part V1 Discharges	Part VI of Volume I of the TRMP provides rules for contaminant discharges. This is proposed to be updated, removing the Permitted Activity rule for the now superseded Richmond Intensive Development Area.
Chapter 36 Rules for Contaminant Discharges	Chapter 36 has been amended to introduce a more stringent standard for new domestic wastewater discharges in the new Wastewater Management Area at Little Ōnahau. Specifically, the maximum application rate for wastewater disposal fields in the Little Ōnahau Rural Residential Zone and the adjoining Light Industrial Zone has been reduced from 2 millimetres per day to 1 millimetre per day. This change reflects the site's sensitivity and aims to better protect groundwater and surface water quality in this area. The updated rule ensures that new wastewater discharges in Little Ōnahau are managed to a higher standard than elsewhere in the Wastewater Management Area, as set out in the Schedule of Amendments (SoA).

Proposed amendments to Tasman Resource Management Plan Volume II

Table 8 includes a list of all the sites included in PC81.

Any sites highlighted blue were changed or introduced following engagement on the draft PC81.

Table 8 PC81 sites and proposed zone changes

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
Richmond	T-112a	Salisbury Road, Richmond	Delete Tourist Services Zone. Add MDRZ. Add OSP.

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
Richmond	T-112b	Salisbury Road, Richmond	Delete Residential Zone. Add MDRZ.
Richmond	T-112c	Salisbury Road, Richmond	Delete Tourist Services Zone. Add Open Space Zone.
Richmond	T-114a	216 Eyles Road, Richmond	Delete Rural 2 Zone. Add Rural Residential Zone.
Richmond	T-115a	Berryfields (Lower Queen Street), Richmond	Delete Mixed Business Zone. Add MDRZ. Add OSP. Area reduced following consultation
Richmond	T-115b	Berryfields (Lower Queen Street), Richmond	Delete Mixed Business Zone. Add Commercial Zone. Add OSP Area increased following consultation
Richmond	T-115c	Berryfields (Lower Queen Street), Richmond	Delete Mixed Business Zone. Add Open Space Zone.
Richmond	T-117	Gladstone Road, Richmond	Delete Residential Zone. Add Mixed Business Zone.
Richmond	T-122a	Main Road Hope, Richmond	Delete Rural 1 Zone. Add Rural 1 deferred Mixed Business Zone.
Richmond	T-178a	Gladstone Road, Richmond	Delete Residential Zone. Add MDRZ. Add Richmond Intensive Development Precinct.
Richmond	T-223a	Champion Road, Richmond	Delete Rural Residential Serviced Zone. Add Rural 2 Zone.
Richmond	T-223b	Champion Road, Richmond	Delete Rural Residential Serviced Zone. Add Residential Zone.
Richmond	T-22a	Richmond Central	Delete Residential Zone. Add MDRZ. Add Richmond Intensive Development Precinct. Add OSP for 120 Wensley
Richmond	T-22b	Richmond Central	Delete Residential Zone. Add MDRZ. Add OSP for 330 Hill Street. Changed from engagement draft as follows - add site adjacent T-22c comprising 48, 50, 52, 54 and 56 Oxford St proposed to be rezoned from Central Business Zone to MDRZ with Richmond Intensive Development Precinct

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
			overlay. These properties already formed part of FDS site T-22
Richmond	T-22c	Richmond Central	Delete Central Business Zone. Add MDRZ. Add Richmond Intensive Development Precinct.
Richmond	T-22d	Richmond Central	Delete Central Business Zone. Add Open Space Zone.
Richmond	T-232a	Appleby Highway, Richmond	Delete Light Industrial Zone. Add Residential Zone. Changed from engagement draft as follows - add MDRZ, add OSP. Change to MDRZ was a landowner request.
Richmond	T-232b	Appleby Highway, Richmond	Delete Rural 1 deferred Residential Zone. Add Residential Zone. Changed from engagement draft as follows - add MDRZ, add OSP. Change to MDRZ was a landowner request.
Richmond	T-233	Richmond Central	Delete Commercial Zone. Add Central Business Zone.
Richmond	T-35a	Main Road Hope, Richmond	Delete Rural 1 Zone. Add Rural 1 deferred Light Industrial Zone.
Brightwater	T-002	Lord Rutherford Rd N, Brightwater	Delete Residential Zone. Add MDRZ.
Brightwater	T-103	Lord Rutherford Rd N – Ellis St, Brightwater	Delete Residential Zone. Add MDRZ. Small refinements in shape to avoid flood hazards
Brightwater	T-104a	Katania Heights, Brightwater	Keep current Residential Zone. Add Brightwater Development Area.
Brightwater	T-104b	Katania Heights, Brightwater	Delete Rural 1 Zone. Add Residential Zone. Add Brightwater Development Area.
Brightwater	T-106	Ellis Street, Brightwater	Delete Light Industrial Zone. Add Commercial Zone.
Brightwater	T-171	SH6, Brightwater	Delete Tourist Services Zone. Add Light Industrial Zone. Changed from engagement draft as follows - site enlarged to include adjacent 30 Factory Road (T-171a). Change was a landowner request.
Brightwater	T-171a	SH6, Brightwater	Delete Rural Industrial Zone. Add Light Industrial Zone.
Brightwater	T-198a	Higgins Road, Brightwater	Delete Rural 1 Zone. Add Rural Residential Zone.

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
Wakefield	T-108	Bird Lane, Wakefield	Delete Rural 1 Zone. Add Rural 1 Deferred Light Industrial Zone.
Wakefield	T-29a	Wakefield Central	Delete Residential Zone. Add MDRZ. Changed from engagement draft as follows - site enlarged to include properties west of Pitfure road following feedback. Change was a landowner request. An OSP now applies for part of the area.
Wakefield	T-29c	Wakefield Central	Delete Light Industrial Zone. Add MDRZ.
Wakefield	T-30	Wakefield Central	Delete Residential Zone. Add MDRZ. Refinements of shape
Wakefield	T-194a	Whitby Road / Higgins Road, Wakefield	Delete Rural 1 Zone. Add Rural 1 deferred MDRZ. Add OSP to guide development
Wakefield	T-194b	Whitby Road / Higgins Road, Wakefield	Delete Rural 2 Zone. Add Rural 2 deferred Residential Zone and Wakefield Development Area.
Wakefield	T-194c	Whitby Road / Higgins Road, Wakefield	Delete Rural 2 Zone. Add Rural 2 deferred MDRZ. Add OSP
Moutere	T-226	Stringer Road, Redwood Valley	Delete Rural 3 Zone. Add Papakāinga Zone
Motueka Valley	T-17a	College Street / Motueka Valley Highway	Delete Rural 2 Zone. Add Rural Residential Zone.
Motueka Valley	T-17b	College Street	Delete Rural 1 Zone. Add Papakāinga Zone.
Motueka Valley	T-17c	Hursthouse Street	Delete Rural 1 Zone. Add Rural Residential Zone.
Motueka Valley	T-17d	Motueka Valley Highway	Delete Rural 2 Zone. Add Rural Residential Zone.
Motueka Valley	T-213	Motueka Valley Highway	Delete Rural 2 Zone. Add Rural Residential Zone.
Motueka Valley	T-205	Motueka Valley Highway	Delete Rural 2 Zone. Add Rural Residential Zone.
Motueka	T-189a	Pā Street / Atkins Street, Motueka	Delete Residential Zone. Add Papakāinga Zone.

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
Motueka	T-190a	High Street	Delete Tourist Services Zone. Add Tourist Services deferred MDRZ. Add OSP. Change from engagement draft as follows– added the Deferred MDRZ due to servicing requirements and add OSP.
Motueka	T-190b	High Street	Delete Rural 1 deferred Residential Zone. Add MDRZ. Change from engagement draft as follows- add Deferred MDRZ due to servicing requirements. Add OSP.
Motueka	T-190c	Whakarewa Street / High Street	Delete Residential Zone. Add MDRZ. Change from engagement draft as follows - due to minimal servicing impact this site can be rezoned to MDRZ now (endorsed by Tasman's FDS implementation board 22nd May 2025). Site boundary amended to include 11A and 11B Coppins Place to enable coordinated redevelopment by Housing NZ and potential access. Add OSP.
Motueka	T-190d		Change from engagement draft as follows. New site but an FDS site. Delete Residential Zone. Add Residential deferred MDRZ. Add OSP. Change arose following infrastructure clarifications as well as the landowner being the same as T-190a and b. Including site T-190d in PC81 will provide access to T-190a and T-190b
Tākaka	T-138a	Rototai Road, Tākaka	Delete Rural 1 Zone. Add MDRZ. Change from engagement draft as follows - add OSP.
Tākaka	T-140a	Tākaka–Collingwood Highway	Delete Rural 2 Zone. Add Rural Residential Zone. Change from engagement draft as follows - add Wastewater Management Area, due to soils and advice from onsite wastewater designer.
Tākaka	T-144	Park Avenue, Tākaka	Delete Rural 1 Zone. Add Rural 1 deferred Residential Zone.
Tākaka	T-182a	Tākaka–Collingwood Highway	Delete Rural 2 Zone. Add Light Industrial Zone. Change from engagement draft as follows- add Wastewater Management Area, due to soils and advice from onsite wastewater designer.
Tākaka	T-227	Pōhara Valley Road, Onetahua Marae, Pōhara	Delete Residential Zone. Add Papakāinga Zone.
Tākaka	T-228	Motupipi Street, Tākaka	Delete Rural 1 Zone. Add Light Industrial Zone.

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
Tākaka	T-229	Motupipi Street, Tākaka	Delete Residential Zone. Add Light Industrial Zone.
Tākaka	T-230	Motupipi Street, Tākaka	Change from engagement draft as follows. New site. Added following discussions with landowners and community. Delete Rural 1 Zone. Add Light Industrial Zone.
Murchison	T-234	26 and rear of 20 Fairfax Street, Murchison	Change from engagement draft as follows. New site. Delete Rural 2 Zone. Add Light Industrial Zone. As a result of FDS site T-148 (on Waller Street) not being supported by the landowners, this new light industrial site is proposed. Scored well in MCA and generally supported by landowners.
Murchison	T-150	Waller/Fairfax Street, State Highway 6, Murchison	Delete Residential Zone. Add Commercial Zone.
Tapawera	T-217	Main Road Tapawera	Delete Light Industrial Zone. Add Residential Zone.
St Arnaud	T-181a	Korere–Tophouse Road	Delete Rural 2 Zone. Add Rural Residential Zone.
St Arnaud	T-219a	Korere–Tophouse Road	Delete Rural 2 Zone. Add Rural Residential Zone.
Māpua	T-235a	6,8,10 and 12 Tahi Street	Delete Residential Zone. Add Recreation Zone. Add OSP
Māpua	T-235b	14 and 16 Tahi Street	Delete Residential Coastal Zone. Add Recreation Zone. Add OSP
Māpua	T-236	23 and 25 Aranui Road, Māpua	Delete Residential Zone. Add Commercial Zone. Add OSP
Māpua	T-237a	Part 120 Higgs Road	Delete Rural 1 deferred Residential. Add Medium Density Residential. Add OSP
Māpua	T-237b	29 Jessie Street	Delete Residential and Part Rural 1 deferred Residential. Add Medium Density Residential. Add OSP
Māpua	T-237c	148 Higgs Road	Delete Rural 2. Add Residential. Add OSP
Māpua	T-237d	140 Higgs Road	Delete Rural 1 deferred Residential. Add Residential. Add OSP

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
		142 Higgs Road 144A Higgs Road 144 Higgs Road 146 Higgs Road	
Māpua	T-237e	120 Higgs Road	Delete Rural 1. Add Open Space. Add OSP
Māpua	T-237f	120 Higgs Road	Delete Residential. Add Open Space. Add OSP
Māpua	T-237g	86 Higgs Road	Delete Rural 1 deferred Residential. Add Rural 1 deferred Medium Density Residential. Add OSP
Māpua	T-238a	35 Higgs Road	Delete Residential. Add Medium Density Residential. Add OSP *
Māpua	T-238b	33 Higgs Road	Delete Residential. Add Medium Density Residential. Add OSP *
Māpua	T-238c	35 Higgs Road	Delete Rural 1 deferred Residential. Add Rural 1.
Māpua	T-239	Part 120 Higgs Road	Delete Rural 1 deferred Residential. Add Commercial.
Māpua	T-240a	109 and 119 Aranui Road, Māpua	Delete Rural Residential deferred Residential Zone. Add MDRZ. Add OSP
Māpua	T-240b	123 Aranui Road	Delete Residential Zone. Add MDRZ
Māpua	T-241	0 Seaton Valley Road	Delete Rural 1 Deferred Residential Zone. Add Open Space Zone. Add OSP
Māpua	T-242	150 Māpua Drive, Māpua	Delete Rural 1 Deferred Residential Zone. Add Commercial Zone. Add OSP
Māpua	T-243	107a/b Aranui Road	Delete Rural Residential Deferred Residential Zone. Add Rural Residential (serviced). Add OSP
Māpua	T-244	18 and 34 Stafford Drive	Delete Rural 1 deferred Light Industrial. Add Light Industrial. Add OSP
Māpua	T-245	29 and 53 Seaton Valley Road	Delete Stage 2 deferred 2031. Add Residential. Add OSP
Māpua	T-246a	Higgs Road	Delete Residential. Add Residential deferred Medium Density Residential. Add OSP
Māpua	T-246b	Higgs Road	Delete Residential. Add Medium Density Residential. Add OSP

Town / Area	Site Location Number on planning maps	Locality	Summary of Change
Māpua	T-247	57, 59 and 69 Stafford Drive	Retain Rural 1 deferred Rural Residential (serviced).
Māpua	T-248	5 Seaton Valley Road	Delete Rural 1 deferred Residential. Add Commercial.
Māpua	T-249	Part 55 Higgs Road	Delete Rural 1 deferred Residential. Add Rural 1. Add OSP
Māpua	T-250	59 Seaton Valley Road	Delete Rural 1 deferred Residential. Add Rural 1 deferred Medium Density Residential . Add OSP
Māpua	T-11a	120, 122, 132, 140, 154, 156, 164 and Seaton Valley Road	Delete Rural Residential. Add Rural Residential deferred Residential. Add OSP
Māpua	T-11b	Part 49 Stafford Drive	Delete Rural 1. Add Rural 1 deferred Medium Density Residential. Add OSP
Māpua	T-42a	Part 49 Stafford Drive	Delete Rural 1 deferred Rural Residential. Add Rural 1 deferred Residential. Add OSP
Māpua	T-42b	Part 49 Stafford Drive	Delete Rural 1 deferred Rural Residential. Add Rural 1. Add OSP
Māpua	T-33a	69, 71, 75, 97, 107, 109, 113, 125, 129, 131 Seaton Valley Road and 63 and 67 Māpua Drive	Delete Rural Residential. Add Rural Residential deferred Medium Density Residential. Add OSP
Māpua	T-33b	69 and 71 Māpua Drive	Delete Residential Zone. Add deferred MDRZ. Add OSP

8. How was the Scale and Significance Evaluated?

Section 32 (1)(c) of the RMA requires that a Section 32 report contains a level of detail that corresponds with the scale and significance of the environmental, economic, social and cultural effects that are anticipated from the implementation of the proposed objectives, policies and methods.

The level of detail undertaken for the subsequent evaluation of the proposed objectives, policies and methods has been determined by the scale and significance assessment carried out in this section.

The scale and significance can also be affected by the reason for the change and this has been taken into account in assessing this.

8.1 Evaluation of Scale and Significance

The evaluation process, and the items that have been used to test the level of scale and significance are set out in the Table 9.

Table 9 Scale and Significance

	Low	Medium	High
Degree of change from the Operative Plan or the status quo		✓	
Effects on matters of national importance (s6)	✓		
Effects on Other Matters (s7)	✓		
Relevant to the principles of the Treaty of Waitangi (s8)	✓		
Relevance to Te Ao Māori, Iwi management plans and level of interest expressed by iwi		✓	
Scale of effects geographically (local, district wide, regional, national), and duration of likely effects		✓	
Scale of effects on people (how many will be affected and degree of interest – single landowners, multiple landowners, neighbourhoods, the public generally, future generations?)			✓
Scale of effects on those with specific interests, e.g., industry groups	✓		
Degree of policy risk – does it involve effects that have been considered implicitly or explicitly by higher order documents? Does it involve effects addressed by other standards/commonly accepted best practice? Is it consistent, inconsistent or contrary to those? Is this a new issue in the region? Or have uncertainties around evidence, or benefits and costs	✓*		
Likelihood of increased costs or restrictions on individuals, communities or businesses	✓		

*There is a low degree of policy risk for Council as the majority of the plan change has already been publicly consulted on and ngā iwi have been involved in this plan change and both the community and ngā iwi had the opportunity to be involved with future growth patterns via the adopted Nelson Tasman FDS. Effects arising from PC81 have already been considered by the FDS, a higher order document. Some effects are also considered by other higher order documents such as the NPS-UD e.g. the change to the interpretation of amenity in respect of intensification. Tables in sections 9 and 10 demonstrate that the benefits of PC81 outweigh the costs and uncertainties around evidence for PC81 do not arise

Overall, the scale and significance of PC81 is assessed as **medium**, hence the detail provided within this evaluation is commensurate with the scale and significance of the environmental, economic and cultural effects that are anticipated. The rigour of the analysis for the preparation of the FDS and

MMP, involvement of ngā iwi, extent of public consultation for the FDS and MMP, as well public engagement for this plan change, has influenced the selection of the low-medium level of significance overall.

9. Assessment of appropriateness of the Proposed Objectives to achieve the purpose of the Act?

9.1 Evaluation Context

The purpose of the preparation, implementation, and administration of district plans is to assist territorial authorities to carry out their functions in order to achieve the purpose of the RMA. The functions PC81 relates to are in RMA s 31 and include subsections (a), (aa) and (b).

Section 32 (1) (a) requires an evaluation of the extent to which the '*objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act.'*

An evaluation of whether the objectives are the "most appropriate" way to achieve the purpose of the Act requires a value judgment as to what is suitable in the circumstances, rather than identifying a single "best" or superior option. The most appropriate option does not need to be the best or optimal but must be shown to achieve the objectives in an efficient and effective manner, *Rational Transport Soc Inc v New Zealand Transport Agency* [2012] NZRMA 298.

A holistic approach to assessing objectives is required, rather than looking at each objective individually. This recognises that the objectives may work inter-dependently to achieve the purpose of the Act, *Art Deco (Auckland) Inc v Auckland Council* [2012] NZEnvC 125.

The decision of the Supreme Court in Environmental Defense Society Inc v New Zealand King Salmon Company Limited determines that where there are clear directive higher level planning provisions these will be deemed to be in accordance with Part 2 of the RMA and there may be no need to for further resort to Part 2 provided the proposed lower level provisions "give effect to" the higher level provisions. Therefore, the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the Act can be reframed, as *the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of the NPS-UD, objectives of the TRPS and having regard to the objectives of the TRPS C1 and FDS including in Māpua having regard to the MMP.* But importantly, the TRPS predates the NPS-UD and so cannot be assumed to give effect to it as a higher-order document.

The new proposed and amended objectives of PC81 are:

- A change to an existing objective to recognise and allow for amenity values, in areas planned for intensification, to develop and change over time (5.2.2)
- A change to an existing objective which refines the objective to focus on community activities in urban areas (5.4.2)
- Urban environments including buildings, places, spaces and networks are well functioning (6.1.2.1)
- Sufficient residential capacity to meet demand in the urban environment and rural centres. (6.4A.2.1)
- That Council plans for greater intensification, responding to housing needs, demand and the town's planned urban built character while incorporating density and quality urban design outcomes (6.4A.2.2)
- That Council provides capacity for suitably located commercial land to provide for regional and district needs for the medium to long term (6.6.2.3) *(note – a similar objective already exists in the TRMP, 6.5.2.2 on a supply of suitably located industrial land to provide for the long term).*

- To establish a hierarchy of existing commercial centres in Tasman, to minimize potential risk to town centres' health from sprawling or ad hoc commercial developments, as a result of growth (6.6.2.4)
- To refer to a commercial environment (rather than business environment) being a high quality and high amenity environment with minimal environmental effects (6.6.2.2)
- To refer to the maintenance and enhancement of the distinctive characters of urban and rural centres (rather than settlements) (6.7.2)
- That papakāinga development is enabled to empower Tāngata Whenua to live on their ancestral land (10A.2.1)
- Tāngata Whenua are supported to exercise rangatiratanga over the development and use of their ancestral land through papakāinga (10A.2.2)
- A safe, efficient and resilient transport system that integrates with land use supports a range of travel modes (11.1.2)

Parts of the NPS-UD require Council to give effect to it through the TRMP. While not all aspects of the NPS-UD are within the scope of PC81, it is intended to give effect to specific provisions as follows:

Relevant NPS-UD Objectives

All objectives, except arguably Objective 7 are directly relevant to Plan Change 81, either as an objective that PC81 is intending to provide for (Objectives 1, 2, 3 and 5) or which guide the direction of PC81 (Objectives 4, 6, and 8).

Summaries of the objectives read:

Objective 1: Seeks urban environments that function effectively, both now and in the future, to enable people and communities to provide for their social, economic and cultural wellbeing, and for their health and safety.

Objective 2: Seeks planning decisions that improve housing affordability by supporting competitive land and development markets.

Objective 3: Seeks district plans and regional policy statements that enable increased housing, business and community service provision in accessible, well-located and high-demand parts of the urban environment.

Objective 4: Recognises that urban environments, including their amenity values, are expected to develop and change over time in response to the diverse and evolving needs of people, communities and future generations.

Objective 5: Requires planning decisions relating to urban environments, and future development strategies, to take into account the principles of Te Tiriti o Waitangi.

Objective 6: Seeks local authority decisions on urban development to be integrated with infrastructure planning and funding, strategic over the medium and long term, and responsive to proposals that would provide significant development capacity.

Objective 7: Requires local authorities to maintain robust and regularly updated information about their urban environments and to use that information to inform planning decisions.

Objective 8: Seeks urban environments that contribute to reductions in greenhouse gas emissions and are resilient to the current and future effects of climate change.

Relevant NPS-UD Policies

- **Policy 1:** Requires planning decisions to contribute to well-functioning urban environments by enabling diverse housing and business opportunities, accessibility, competitive markets, reduced emissions, and climate resilience.
- **Policy 2:** Requires tier 1, 2 and 3 local authorities to provide at all times at least sufficient development capacity for housing and business land over the short, medium and long term.
- **Policy 5:** Requires tier 2 and 3 planning instruments to enable heights and density commensurate with either accessibility to services and transport or relative demand in that location, whichever is greater.
- **Policy 6:** Requires decision-makers, in planning decisions affecting urban environments, to have particular regard to planned urban form, the benefits of intensification, contributions to development capacity, and climate change effects.
- **Policy 7:** Requires tier 1 and 2 local authorities to set housing bottom lines for the short-medium term and long term in their regional policy statements and district plans.
- **Policy 9:** Requires local authorities, in taking account of Te Tiriti o Waitangi principles, to involve hapū and iwi early and meaningfully, consider their values and aspirations, provide opportunities for Māori participation in decision-making where appropriate, and act consistently with iwi participation legislation.

The objectives of the TRMP were also reviewed as to their scope and whether they sufficiently gave effect to the operative TRPS and had regard to the relevant proposed provisions of TRPS C1.

It is helpful to also consider alternative objectives to those proposed to examine the extent to which the proposed objective(s) are the most appropriate to achieve the purpose of the RMA. Given PC81 is largely responding to national direction, the options at an objective level are limited. This section of the report analyses the list of options from section 5.0 to examine the extent to which the suite of proposed objectives is the most appropriate way of achieving the purpose of the Act/established planning documents.

Given the scale and significance of the plan change is assessed as medium overall in section 8 of this report, this analysis is relatively high level.

For the purposes of this s 32 evaluation the following criteria form the basis for assessing the appropriateness of the proposed objectives:

Table 10 Assessment Criteria

Category	Criteria
Relevance	• Directed to addressing a resource management issue • Focused on achieving the purpose of the Act • Assists the Council to carry out is statutory functions (RMA s.30 and s.31) • Within scope of higher-level documents
Feasibility	• Acceptable level of uncertainty and risk • Realistically able to be achieved within Council's powers, skills and resources
Acceptability	• Consistent with identified iwi/Māori and community outcomes • Will not result in unjustifiably high costs on the community or parts of the community

9.2 Evaluation of the proposed and amended objectives

The proposed and amended objectives of the proposal are evaluated below to determine whether they are the most appropriate way to achieve the purpose of the Act. As noted above, where there

are superior planning instruments achieving the purpose of the Act it is assessed against those instruments as, subject to an exception applying, they themselves give effect to the purpose of the RMA. No exceptions to this principle have been identified in PC81.

The assessment groups together some related urban development proposed objectives for assessment as follows:

- Appropriateness of two new and three amended objectives related to land for residential activities
- Appropriateness of two new and three amended objectives related to land for commercial activities
- Appropriateness of two new objectives on papakāinga.

NB the amendment to objective 5.2.2, while strictly speaking applies generally and not just to residential land uses, is most relevant and directed through policies at residential environments. Therefore it is assessed alongside the residential objectives.

9.3 Appropriateness of two new objectives and two amended objectives related to land for residential activities

Table 11 Appropriateness Assessment

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2	
New objective 6.4A.2.1	Sufficient residential capacity to meet demand in the urban environment and rural centres.
New objective 6.4A.2.2	A well-functioning urban environment through Intensification that provides achieves a variety of housing types and sizes – close to centres and within identified areas – that responds to: (a) 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.
Existing objective 5.2.2 amended: Maintenance and enhancement of amenity values on site and within communities throughout the District, while recognising and allowing for amenity values, in areas planned for intensification, to develop and change over time.	
Existing objective 6.1.2.1 amended: Urban environments including buildings, places, spaces and networks are well-functioning and ~~that~~ together, by design, sustain towns as successful places to live, work and play.	
Existing objective 11.1.2 amended: A safe, efficient, and resilient transport system that integrates with land use, supports a range of travel modes, and where any adverse effects of the subdivision, use, or development of land on the transport system are avoided, remedied, or mitigated.	
General intent of new and amended objectives:	
To provide sufficient dwelling capacity to meet demand in Tasman's urban environment but also to provide for well-functioning urban environments with capacity for the right type of housing in the right place – including sufficient density, attached dwellings, and making more efficient use of land, while recognising that amenity values in areas planned for intensification will develop and change over time. The issue of lack of variety of dwellings also applies to parts of Tasman's rural environment e.g. Tākaka. New objectives address some of the key resource management issues identified in section 4. Amended amenity, urban environment and transportation objectives ensure	

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2			
development is consistent with the requirement to provide for well-functioning urban environments that recognise the changing nature of transportation, provision for vehicle access, and evolving amenity expectations in intensification areas.			
Other objective options			
Status quo: Do not update the TRMP with new objectives, instead relying on its existing provisions giving effect to the NPS-UD Alternative: Amend the TRMP but with fewer objectives and less prescription with one new overarching objective only			
Existing relevant objectives in the Plan			
Objective 6.1.2.2: A wide range of living opportunities in urban locations that incorporate urban design principles	The TRMP contains existing objectives like this one which relate to the proposed objectives, but they do not refer to medium density residential development in Tasman's larger towns. The reference to urban design principles is also a little vague.		
Objective 6.2.2.2: Urban growth and sufficient opportunities, including redevelopment opportunities that encourage more efficient use of land, energy and provision of infrastructure, services and amenities	Objective 6.2.2.2 refers to more efficient redevelopment of land for urban growth but does not provide context on how that may be achieved e.g. medium density residential development in Tasman's larger towns.		
Objective 6.2.2.3: For the period 2024 to 2054, the minimum sufficient development capacities for housing in the Tasman portion of the Nelson-Tasman Urban Environment are provided	Objective 6.2.2.3 relates to overall housing bottom lines for Tasman (as required by the NPS-UD) but does not go into the detail of demand for smaller, attached dwellings or the lack of capacity of that typology.		
	Proposed objectives option (a)	**Objective option (b) (Status quo)**	**Objective option (c)**
	Introduce new objectives to the TRMP to give effect to the NPS-UD, also have regard to TRPS C1, the FDS objectives and the MMP. The overall structure of the TRMP is retained but new objectives are added or existing ones amended	**Do not update the TRMP with new objectives instead relying on its existing objectives to give effect to the NPS-UD**	**Amend the TRMP but with fewer objectives and less prescription with one new overarching objective only (6.4A.2.1)**
Relevance:			
Directed to addressing a resource management issue	The proposed objectives 6.4A.2.1 and 6.4A.2.2 address some of the key resource management issues in section	To rely on the existing objectives in the TRMP, summarised above, would not provide emphasis on the need for greater	Solely overarching objective 6.4A.2.1 could be proposed in PC81 and not the more detailed objective 6.4A.2.2. Part of the NPS-

	4.1 of this report on providing sufficient capacity of denser attached dwellings, the current lack of variety of dwellings and the consequential inefficient use of land where urban expansion is proposed but typologies are not sufficiently varied. The proposed objectives highlight the regulatory move towards intensification, close to centres and within identified areas, to increase diversity in typology and make more efficient use of land. Amended objectives ensure that capacity provided for is consistent with well-functioning urban environments, appropriately supported with multimodal and fully integrated transportation networks. The proposed objectives give effect to objectives 1 and 3 and policies 1 and 5 of the NPS-UD above, which provide directions for District Plans. Tasman's HBAs 2021 and 2024 prove that demand exists for more intensive forms of housing in Richmond. The proposed objectives also have regard to the proposed urban development objectives 2A, 5.1A and 5.1B of the TRPS C1 concurrent with this plan change on contributing to a well-functioning urban environment,	provision of smaller homes in Tasman District and the benefits of such density to meet certain housing need. The existing objectives also do not provide context on how redevelopment opportunities might encourage more efficient use of land, they simply state the housing capacity needed and that more efficient use of land is sought. To rely on the status quo would likely not provide sufficient capacity of the right type of dwellings to meet demand, indeed it has not achieved this to date. While 29% of Tasman residents prefer a duplex, terraced house or apartment in a 2021 Council survey, 90% of dwellings were stand alone typologies in 2018 in Tasman. The status quo option would not address the key resource management issues in section 4.1, other than striving to provide sufficient capacity of housing overall (existing TRMP objective 6.2.2.3).	UD could be given effect to, (objective 3), but not policy 1 or policy 5 of the NPS-UD (see above). This approach would also do little more than repeat a proposed objective in the TRPS C1 - objective 5.1B, that towns have a diverse range of housing types. It would not identify that comprehensive housing in the new MDRZ can provide a way of securing medium density housing, which the second proposed TRMP objective does, 6.4A.2.2. Further regulatory change with a second objective, is required to proactively address the key resource management issues in section 4.1 of this report, notably that Council's recent HBA 2024 shows a consistent shortfall of supply of small, attached dwellings. By not including two proposed objectives in PC81 in the 'land for residential activities' section of the TRMP, there would doubtless be greater debate at the consenting stage or private plan change hearings, over the detail of how greater variety of dwellings could be provided, without successfully addressing the need.

providing sufficient housing land capacity and providing a diverse range of housing types including medium density.

The proposed TRMP objectives as part of PC81 seek to provide capacity for the right type of housing in the right town and a range of housing types. In doing so they broaden the scope from the existing objectives to cover the range of outcomes that the new associated policies and methods need to achieve. The proposed provisions provide for the current shortage of smaller attached homes as demonstrated in Council's HBA 2024 and the significant demand for medium density dwellings such as (duplex, terraced house or apartment). In Council's housing preferences survey 2021, 29% of Tasman's residents preferred such a dwelling (income constrained survey).

Amendment to amenity objective 5.2.2 ensures alignment with TRPS C1 and NPS-UD in relation to changing environments where intensification occurs.

Amendments to transportation objective 11.1.2.1 and urban environments objective 6.1.2.1 ensure alignment with the NPS-UD regarding well-functioning urban environments

	that take a multi-modal integrated approach to transportation.		
Focused on achieving the purpose of the Act	The proposed objectives promote the sustainable management of natural and physical resources by e.g. seeking for Tasman to contribute to a well-functioning Nelson Tasman urban environment (having regard to proposed General Objective 2A in TRPS C1) and explaining how the efficient use of land for intensification will be required close to centres and within identified areas. By providing a range of housing types and sizes this will provide for peoples' and communities' social, economic and cultural wellbeing. Proposed objective 6.4A.2.2 aligns with secondary legislation (NPS-UD) by promoting quality urban design but stopping short of protecting and enhancing amenity in intensification areas. The NPS-UD has acknowledged that in urban environments, a trade off may be made in planning decisions on intensification, as they may detract from amenity values appreciated by some people but improve amenity values appreciated by other people. The NPS-UD also acknowledges in policy 6 that the changes brought about to an area from plan changes are not, of themselves an adverse effect.	The existing objectives go some way to achieving the purpose of the Act e.g. efficient use of land, but existing objectives 6.2.2.2 and 6.2.2.3 do not provide as much context on how that can be achieved in relation to housing, as the proposed objectives (which propose intensification). This means in all probability that to rely on existing objectives, insufficient dwelling capacity of the right type would be provided in Tasman. This in turn would not provide for peoples' and communities' social, economic and cultural wellbeing, including helping address the lack of affordability of housing in Tasman.	Solely overarching objective 6.4A.2.1 could be proposed in PC81 and not the more detailed objective 6.4A.2.2. This would be similar to existing objectives in the TRMP on land for residential activities and would not make clear that further regulatory change is required, (via the new MDRZ), to achieve sustainable management of resources in Tasman and deliver new housing.

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2			
	Amendment to amenity objective 5.2.2 ensures alignment with TRPS C1 and NPS-UD in relation to changing environments where intensification occurs. Amendments to transportation objective 11.1.2.1 and urban environments objective 6.1.2.1 ensure alignment with the NPS-UD regarding well-functioning urban environments that take a multi-modal integrated approach to transportation. Amended objective 11.1.2.1 provides a more appropriate and efficient objective for context for changes required by the NPS-UD relating to parking (Policy 11), de-emphasising the dominance of private vehicles in favour of active, public and multi-modal, transportation.		
Assists the Council to carry out is statutory functions (RMA s.30 and s.31)	Section 31 of the RMA prescribes the functions of territorial authorities and 31 (aa) requires councils to establish, implement and review objectives to ensure that there is sufficient development capacity in respect of housing land to meet demand. Existing objectives in the TRMP and relevant proposed urban development objectives in TRPS C1 alone would not assist Council in carrying out its statutory functions as well as the two new residential objectives in PC81. They are required to assist Council to carry out its	The existing TRMP objectives alone do not provide sufficient context to explain how Tasman might provide sufficient housing capacity to meet demand, particularly capacity for attached dwellings. The existing objectives do not address policy 5 of the NPS-UD, to enable heights and density of urban form and consequently do not assist Council in fully carrying out its statutory functions. Without these new objectives, (and policies and methods below them) Tasman would doubtless continue to provide insufficient attached dwellings in	If only objective 6.4A.2.1 was proposed, seeking a wide range of residential activities on residential zoned land, such minimal changes would not greatly assist Council in fully carrying out its statutory functions under section 31 of the RMA. Solely an overarching objective seeking a wide range of residential activities does not fully align with the NPS-UD as it is not identifying that demand for stand- alone and attached dwellings needs to be provided for (clause 3.2 NPS-UD). It would also not reflect Council's adopted FDS and its strategy for housing land capacity, being a mix of

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2			
	housing land capacity functions. The two proposed objectives enable policies and methods to be proposed which will provide sufficient housing and business land capacity to meet expected demand and of the right type. The NPS-UD, a planning instrument under the RMA, requires tier 2 Councils like Tasman to provide sufficient capacity for both standalone dwellings and attached dwellings, supported by well-functioning urban environments that have connected multi-model transportation networks. The proposed new objectives therefore directly assist the Council with carrying out its statutory functions.	its urban environment, as recent HBAs and Stats NZ data have demonstrated.	intensification and managed urban expansion.
Within scope of higher-level documents	The proposed objectives give effect to higher order documents, including: objective 3 and 4, policy 1, policy 5, policy 6, policy 9 and policy 11 of the NPS-UD, as well as other NPSs. These higher order documents have informed and in some cases directed PC81. The proposed objectives have regard to Council's adopted FDS and concurrent TRPS C1 and in Māpua the MMP. PC81 proposes changes to some parts of the District with comprehensive housing. These changes may detract	The status quo option would not give full effect to the NPS-UD, TRPS C1 or be aligned with Council's adopted FDS. The existing objectives are within the broad scope of the higher level documents but do not go far enough to ensure provision of the right type of housing capacity in the right location.	By only including a more generic objective on a wide range of residential activities on land zoned for residential purposes (6.4A.2.1) in urban areas, this would not enhance the status quo position sufficiently. This objective alone would not fully align with the scope of the NPS-UD or have regard to the FDS or TRPS C1.

	from amenity values appreciated by some people but improve amenity values appreciated by others, including by providing varied housing densities and types. This has regard to proposed amended urban development objective 5.5 in TRPS C1, which acknowledges amenity values of urban and built form may develop and change over time with intensification. This interpretation of amenity aligns with the NPS-UD's interpretation in policy 6.		
Feasibility:			
Acceptable level of uncertainty and risk	Engagement commenced on PC81 in October 2024 and there have been two rounds of engagement, the second in March 2025, before notifying this plan change. Feedback from these rounds has been considered and several amendments made. One of the elements in PC81 is the introduction of a new MDRZ, which the proposed objectives enable. Following Tasman's plan change 66, 'Richmond Housing Choice' operative in 2018, there has been a net gain of 89 dwellings in Richmond's intensive development area by the end of 2024. There is clear demand for medium density dwellings and increased housing choice. Council's 2021 housing preferences survey also indicated this. PC81 builds on these operative rules and is more aspirational	The existing objectives are limited in scope and somewhat outdated. They alone would not give full effect to the proposed objectives in the TRPS C1, objectives of the FDS, or requirements of the NPS-UD. To rely on the operative objectives alone would increase risk and uncertainty, including for future applicants. It would also heighten the risk of Council not providing sufficient housing land capacity of the right type to meet demand over the next 10 years. Tasman's 2024 HBA has found a shortfall in dwelling capacity over the next 10 years, even with the capacity from PC81 sites included. The same HBA has also identified a significant shortfall of attached dwellings over the short, medium and long terms.	By introducing one new residential objective (6.4A.2.1) only, providing an overarching objective, would not be efficient. Uncertainty would remain as to how the Council wants to achieve a wide range of residential activities on zoned land. Given the TRMP is being amended in any case, it is easy to include fuller residential objectives, enabling policies and rules to also be proposed in the new MDRZ. To only rely on one new high level residential objective would increase the level of uncertainty and risk, since neither the NPS-UD or TRPS C1 are being given full effect to and key resource management issues would remain unaddressed i.e. lack of smaller attached dwellings in Tasman.

in the type of intensification and density sought.

Tasman's HBAs have included analysis on land value to capital value ratios in Richmond's centre, showing that the objective of intensification here is feasible.

Most of the sites to be rezoned in PC81 form part of the adopted FDS, already extensively publicly consulted on and all landowners of FDS sites were contacted during PC81 as well, including landowners within the MDRZ. In addition, in Māpua extensive consultation was undertaken as part of the MMP.

Through development of the Richmond Spatial Plan and MMP there was clear support for intensification and more housing choice. Community support for integrated, connected and diverse transportation networks within a well-functioning urban environment, was also shown.

For these reasons this option has limited risk and uncertainty. The plan change is also largely directed by the NPS-UD and aligns with the FDS' objectives.

OSPs are proposed for large greenfield sites in the MDRZ to reduce uncertainty.

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2			
	Quality urban design supporting well-functioning urban environments can be achieved through use of OSPs. They bridge the gap between detailed subdivision design and well-functioning zone objectives, recognising that it is often not feasible to provide details for a land use consent application early, showing how larger sites will be developed at medium density. It is also difficult to write rules for such sites due to differing shapes and sizes. The outline development plan approach instead sets out the strategic requirements of each site and while they are a form of regulation, each landowner has had the opportunity to contribute to the plans during pre-notification engagement.		
Realistically able to be achieved within Council's powers, skills and resources	Including two residential objectives and amended urban and transportation objectives as part of PC81 is within the Council's powers and responsibilities. The two proposed residential objectives give effect to the NPS-UD requirements for Tasman, which has been in force since 2020. New concepts are therefore not being introduced.	The status quo position on TRMP residential objectives would be easier to implement as it would involve fewer changes to TRMP. This would be within Council's powers and responsibilities. However the lack of full alignment with the NPS-UD requirements would pose risks.	It is within Council's powers, skills and resources to introduce only one high level new residential objective (6.4A.2.1), aligning with the NPS-UD. However since a plan change is proposed anyway, it is efficient to give fuller effect to higher order documents and expand the scope of new residential objectives, to provide for medium density residential development. Such an approach is within Council's powers and responsibilities.
Acceptability:			
Consistent with identified iwi/Māori and community outcomes	A number of the iwi management plans identified in section 6.3 above, seek for urban development to be contained within urban zones and/or a range of	Relying solely on existing residential objectives in the TRMP is likely to result in a poor level of political acceptance. Council has adopted the FDS and the HBA	By only introducing one high level new residential objective (6.4A.2.1), and not introducing housing intensification as an objective, this would not be reflecting the

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2			
	desirable housing options being available. They also wish for productive rural areas to be protected from such development and concerns over pressure on the whenua from urban development. Introduction of objectives in PC81 that enable a new MDRZ in towns would be consistent with these aspirations. It would also help meet identified community demand for duplexes, terraced houses or low- rise apartments and the lack of housing affordability. Feedback on a draft of PC81 demonstrated support for housing intensification, providing housing for older adults and first home buyers but called for good quality design outcomes. These themes are consistent with the feedback received during development of the Richmond Spatial Plan and the MMP and PC81 addresses these requirements.	2024 and therefore is familiar with the significant lack of smaller attached dwellings in the District and Council's intensification aims.	demand that exists among the community for smaller attached dwellings, according to the 2021 Housing Preferences Survey. It also would not align with engagement feedback received on PC81.
Will not result in unjustifiably high costs on the community or parts of the community	The plan change itself involves significant development costs, as it is a large plan change, required to meet obligations in the RMA and NPS-UD. PC81 is being prepared concurrently with TRPS C1, so that there will be less administration costs than if the two changes were processed separately. It will also mean the TRPS objectives are	Neutral as no additional cost. However the social, environmental and cultural costs could be high if the existing TRMP residential objectives are not supplemented, due to the lack of direction on the form of new housing land capacity. Regulatory change is required to achieve the desired outcomes, of more smaller, denser homes in our towns. Some of the	Minimal changes to the regulatory framework result in less disruption and lower short-term costs to the community. However the social and environmental costs would potentially be high, by only introducing one high-level objective, through lack of regulatory direction providing for well- functioning urban environments including a lack of smaller dwellings being provided by the market.

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2			
	fully implemented via the concurrent PC81 change. In terms of the costs of the outcomes PC81 is intended to achieve, PC81 will not result in unjustifiably high costs. Council is rezoning residential land to help ease housing affordability and avoid constrained supply. The sites proposed in Tasman's urban environment contribute to a well-functioning urban environment, with positive social outcomes rather than costs. The enabling nature of the PC81 is likely to reduce transaction costs (consenting) and the site assessment process has ensured limited environmental costs. Certainty for appropriate developments is a core focus of the objectives and provisions that implement the objectives.	resource management issues identified above would also fail to be addressed.	

Overall assessment of the appropriateness of proposed Objectives 6.4A.2.1 and 6.4A.2.2 and amended Objectives 6.1.2.1 and 11.1.2
Overall, proposed Objectives 6.4A.2.1 and 6.4A.2.2, together with amended Objectives 5.2.2, 6.1.2.1 and 11.1.2, are the most appropriate way to achieve the purpose of the Act. They respond directly to the identified resource management issues by providing a clear and integrated framework for sufficient housing capacity, a greater range of housing types, urban intensification in appropriate locations, and integration of land use with transport outcomes. Compared with the status quo and more limited amendment options, these objectives provide a stronger and more effective basis for addressing the identified shortfall in smaller and attached dwellings, improving housing choice, and supporting well-functioning urban environments.

Proposed Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2 and related amended objectives 5.2.2, 6.1.2.1 and 11.1.2

They also promote the efficient use of land and infrastructure, support people and communities to provide for their social and economic wellbeing, and recognise that urban intensification will result in changes to urban form and amenity over time. In addition, the objectives give effect to the NPS-UD and the operative TRPS, and have regard to the FDS, the MMP, and TRPS C1.

Overall, Option (a), being the full suite of new and amended objectives, is the most appropriate because it provides a coherent and comprehensive framework for addressing the identified issues and supporting an effective regulatory response.

9.4 Appropriateness of two new proposed objectives and three amended objectives related to land for commercial activities

Table 12 - Appropriateness Assessment

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2
6.6.2.3 A supply of suitably located commercial land to provide for the medium to long-term needs of the Tasman and Nelson region. **6.6.2.4** An established hierarchy of existing commercial centres that provides a focus for retail, commercial, community and entertainment activities and that serves the social, cultural, economic and environmental needs of the community. **Existing objective 5.4.2 amended:** Accommodation of a wide range of ~~residential activities and~~ accessible community facilities in urban areas **Existing objective 6.6.2.2 amended:** A high quality, high amenity ~~business~~ commercial environment with minimal environmental effects within and beyond the zone boundary. **Existing objective 6.7.2 amended:** Maintenance and enhancement of the distinctive characters of urban and rural centres ~~settlements~~ and integration between ~~settlements~~ centres and their adjoining landscapes.
General intent of objectives
To provide sufficient commercial land capacity to meet demand in the Nelson Tasman urban environment over the long term. *(Note there is an existing objective 6.5.2.2 on a supply of suitably located industrial land to provide for the medium to long term).* To establish a hierarchy of existing commercial centres and protect town centre vitality by managing where and how commercial development occurs. Amending existing objectives to refer to both the commercial environment specifically and Tasman's urban and rural centres, rather than the outdated 'settlements' term. Amending an existing community facilities objective to narrow focus of its policy set on community activities rather than residential activities and community facilities (consequential amendment of PC81).
Other objective options
Status quo: Do not update the TRMP with new objectives instead relying on its existing provisions giving effect to the NPS-UD
Alternative: Amend the TRMP but with fewer objectives and less prescription with one new objective only

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
Existing relevant objectives in the Plan			
Objective 6.1.2.2 Urban buildings, places, space and networks that together, by design, sustain towns as successful places to live, work and play	Objective 6.1.2.2 is a very high-level objective relating to urban buildings, spaces and networks generally, also aspiring for sustainable towns but without any objectives for individual towns.		
Objective 6.6.2.1 effective accommodation of a wide range of commercial activities on appropriately located sites, including a strong, vibrant commercial focus in the main towns	Objective 6.6.2.1 on commercial activities does not make any reference to the need to provide sufficient capacity of commercial land to meet demand over the long term, as required by the RMA and NPS-UD.		
Objective 6.6.2.2 a high quality, high amenity commercial environment with minimal environmental effects within and beyond the zone boundary	Objective 6.6.2.2 is generally prioritising Tasman's commercial environment within its Commercial Zone District wide, seeking any environmental effects from those activities to be minimal. It does not relate to the different role and function of each commercial centre.		
	Proposed objectives option (a)	**Objective option (b) (Status quo)**	**Objective option (c)**
	Introduce new objectives to the TRMP to give effect to the NPS-UD, also having regard to Council's FDS objectives and Proposed TRPS C1. The overall structure of the TRMP is retained but new objectives are added or existing ones amended	**Do not update the TRMP with new objectives instead relying on its existing objectives to give effect to the NPS-UD**	**Amend the TRMP but with fewer objectives and less prescription with one new objective only (6.6.2.3)**
Relevance:			
Directed to addressing a resource management issue	The two proposed objectives are directly relevant to addressing the key resource management issues identified in section 4.1. In particular, they respond to the requirement in the NPS-UD to provide sufficient commercial land capacity to meet expected demand over the medium to long term, and to manage the distribution of commercial activities	The existing objectives (6.1.2.2, 6.6.2.1, and 6.6.2.2) are only partially relevant to the identified issues. While they aspire to successful urban environments and a strong commercial presence in the main towns, they do not provide clear direction on how these outcomes are to	This option would introduce objective 6.6.2.3 to provide for sufficient commercial land capacity, but would not include objective 6.6.2.4 relating to a centres hierarchy. While this approach would address the requirement to provide sufficient

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
	in a way that supports the vitality of town centres as the region grows. Objective 6.6.2.3 provides for sufficient commercial land capacity, while objective 6.6.2.4 establishes a centres hierarchy to guide where commercial development should occur. Together, these objectives provide a balanced framework that addresses both the supply of land and the spatial distribution of commercial activities. The hierarchy is based on the National Planning Standards zone framework (e.g. Metropolitan Centre Zone, Local Centre Zone), although PC81 does not change the underlying zoning. Rather, it uses those zone typologies to define the role and function of centres, with any future alignment of zones to the National Planning Standards to occur through a later plan change.	be achieved or which centres are intended to perform these roles. In particular, objective 6.6.2.1 does not give effect to the NPS-UD, as it does not recognise the need to provide sufficient commercial land capacity to meet demand over the long term. Nor do the existing objectives establish a clear hierarchy of centres or define the intended role and function of each centre. This lack of direction is not addressed elsewhere in the Plan. As a result, there remains an identified policy gap, particularly in relation to out-of-centre commercial development. Recent private plan change hearings have highlighted the risk that the function and vitality of established centres could be undermined by large format retail development locating outside those centres. Reliance on the status quo would therefore not address the identified resource management issues, particularly the lack of clarity around the role and function of centres and the absence of a strategic approach to commercial land supply.	commercial land capacity and therefore partially respond to the NPS-UD, it would not address the complementary issue of how and where that development should occur. In the absence of a centres hierarchy, there would be no clear strategic direction to manage the spatial distribution of commercial activities or to protect the vitality of established centres. As a result, this option would only address one of the key resource management issues identified in section 4.1 (capacity), and would not address the related issue of maintaining a coherent network of centres with defined roles and functions. The risk of dispersed, ad hoc commercial development would remain.

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
Focused on achieving the purpose of the Act	The proposed objectives are focused on achieving the purpose of the Act by supporting the sustainable management of natural and physical resources in urban environments. Objective 1 of the NPS-UD identifies that well-functioning urban environments enable people and communities to provide for their social, economic and cultural wellbeing. This aligns with the purpose of the Act. Objective 6.6.2.3 ensures that sufficient commercial land capacity is provided to meet demand over the long term, while objective 6.6.2.4 provides a framework to manage the distribution of commercial activities across a hierarchy of centres. Together, these objectives enable commercial development to occur in locations that support efficient use of land and infrastructure, while maintaining the role and function of centres. This balanced approach supports the ongoing ability of centres to meet different community needs (for example, daily convenience needs and higher order retail functions), and therefore promotes well-functioning	The existing objectives are not well focused on achieving the purpose of the Act. While they seek high-quality urban environments and a strong commercial presence in main towns, they do not address how commercial land should be sustainably managed over time. In particular, they do not recognise the cumulative effects of dispersed, out-of-centre commercial development, including increased vehicle travel and consumption of rural land. The existing objectives were developed in a context where large format out-of-centre retail development was limited. As a result, they focus primarily on amenity and design outcomes, rather than providing a framework for managing the location and scale of commercial development across the district. In the absence of clear direction, there is a risk that commercial activities locate in a way that undermines the viability and function of established centres. This can reduce accessibility to goods and services and compromise the ability of communities to meet their social and economic wellbeing needs.	Introducing objective 6.6.2.3 alone would partially focus the Plan on achieving the purpose of the Act by ensuring sufficient commercial land capacity is provided to meet long-term demand. This would support economic wellbeing by enabling commercial development opportunities. However, without objective 6.6.2.4, there would be no clear framework to manage the location and distribution of that development. In particular, the Plan would lack direction on how commercial growth should be accommodated across a hierarchy of centres. As a result, while capacity would be provided, the development of commercial land may occur in a dispersed or uncoordinated manner, including in locations that are not well served by infrastructure or that compromise the function of existing centres. This could lead to inefficient use of land and resources, including the unnecessary consumption of rural land. This option would therefore only partially achieve the purpose of the Act, as it addresses the provision of capacity but not the sustainable management of

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
	urban environments consistent with the purpose of the Act.	Accordingly, reliance on the existing objectives would not adequately promote the sustainable management of commercial land and development in accordance with the purpose of the Act.	where and how commercial activities are established.
Assists the Council to carry out its statutory functions (RMA s.30 and s.31)	Section 31(1)(aa) of the RMA requires territorial authorities to establish, implement and review objectives to ensure sufficient development capacity for business land to meet expected demand. The existing TRMP contains an objective addressing industrial land capacity (6.5.2.2), but does not contain an equivalent objective for commercial land. Proposed objective 6.6.2.3 fills this gap by requiring sufficient commercial land capacity to be provided over the long term, thereby assisting the Council to fully carry out its statutory function under s31(1)(aa). In addition, proposed objective 6.6.2.4 establishes a hierarchy of centres, which assists in achieving the integrated management of land use under s31(1). By providing a clear framework for the location and distribution of commercial activities, it supports the efficient use of land and infrastructure and the coordinated development of urban areas.	The existing TRMP objectives relating to commercial activities (6.1.2.2, 6.6.2.1 and 6.6.2.2) do not fully assist the Council in carrying out its statutory functions. In particular, they do not recognise the requirement under s31(1)(aa) to ensure sufficient development capacity for commercial land to meet long-term demand. While an equivalent objective exists for industrial land (6.5.2.2), no such objective applies to commercial land. The existing objectives also do not provide a framework for the integrated management of commercial development across the district, as they do not define the role and function of centres or direct where commercial activities should be located. As a result, reliance on the existing objectives would mean the Council is not fully supported in carrying out its statutory functions in relation to commercial land.	Introducing proposed objective 6.6.2.3 alone would assist the Council in carrying out its statutory function under s31(1)(aa) by requiring sufficient commercial land capacity to be provided to meet long-term demand. However, without proposed objective 6.6.2.4, the Plan would not provide a framework to support the integrated management of commercial activities under s31(1). In particular, it would not address how commercial development should be distributed across a hierarchy of centres or how the effects of that development should be managed at a strategic level. As a result, this option would only partially assist the Council in carrying out its statutory functions, as it addresses the requirement for capacity but not the broader requirement for integrated management of land use.

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
	Together, the proposed objectives assist the Council to carry out its statutory functions under the RMA in a comprehensive way.		
Within scope of higher-level documents	The proposed objectives are within scope of, and appropriately respond to, higher-order planning documents. At a national level, they give effect to the National Policy Statement on Urban Development (NPS-UD), including Objective 1 (well-functioning urban environments), Objective 3 (enabling a variety of homes and employment opportunities), and Policies 1 and 2. In particular, providing sufficient commercial land capacity and maintaining a network of well-functioning centres supports the ability of communities to meet their social, economic and cultural wellbeing needs. At the regional level, the proposed objectives give effect to the operative TRPS by supporting a planned and integrated approach to urban development and commercial activity. The proposed objectives also have regard to Council's adopted Future Development Strategy (FDS) and the proposed provisions in TRPS Change 1. Objective 2 of the FDS seeks the consolidation and intensification of	The status quo option is only partially within scope of higher-level documents and does not appropriately give effect to, or have regard to, them. While the existing objectives broadly enable commercial activities, they do not give effect to the NPS-UD, as they do not require sufficient commercial land capacity to meet long-term demand. They also do not provide a framework for well-functioning urban environments in the way anticipated by the NPS-UD, particularly in relation to the distribution and integration of commercial activities. In relation to the operative TRPS, the existing objectives do not provide a clear or coordinated approach to managing the role and function of centres across the district, limiting their effectiveness in giving effect to regional direction. The existing objectives also do not adequately have regard to the FDS or TRPS C1. In particular, they do not support the consolidation and intensification of existing main centres or the development of a coordinated network of centres. Nor do they align	This option would partially respond to higher-level documents. Introducing objective 6.6.2.3 would give effect to the NPS-UD requirement to provide sufficient development capacity for commercial land over the long term. It would also align, to some extent, with the operative TRPS by supporting the provision of business land to meet demand. However, without objective 6.6.2.4, the Plan would not provide a framework to manage the distribution of commercial activities across a hierarchy of centres. As a result, it would not fully give effect to the NPS-UD's focus on well-functioning urban environments, nor would it adequately support the integrated and coordinated urban form contemplated by the operative TRPS. This option would also only partially have regard to the FDS and TRPS C1. While it supports the provision of capacity, it does not align with the direction to consolidate and intensify existing centres or to establish a planned

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
	existing main centres, supported by a network of smaller centres. Similarly, proposed objective 5.1C and policy 5.1C in TRPS C1 provide for urban centres to grow within a planned hierarchy supported by efficient infrastructure. Objective 6.6.2.3 (capacity) and objective 6.6.2.4 (centres hierarchy) align with and support this direction. Together, they ensure that commercial land is both sufficient and appropriately located, consistent with the direction of higher-order documents.	with the proposed centre hierarchy approach in TRPS C1. As a result, reliance on the existing objectives would not appropriately respond to the direction provided in higher-order documents.	network of centres with defined roles and functions. Accordingly, this option would not fully align with the scope and intent of higher-level planning documents.
Feasibility:			
Acceptable level of uncertainty and risk	The level of uncertainty and risk associated with this option is acceptable and relatively low. Preparation of PC81 has involved two rounds of engagement (October 2024 and March 2025), with feedback from those processes incorporated into the proposed provisions. The Richmond and Māpua components have also been informed by spatial planning processes, including multiple rounds of community engagement in Māpua. The proposed objectives implement national direction in the NPS-UD and have regard to the FDS, providing a well-tested and consistent strategic framework. Objective 6.6.2.3 provides	The level of uncertainty and risk associated with this option is high. The existing objectives are broad, high-level, and were developed in a different growth context. They do not give effect to the NPS-UD or have regard to the more recent strategic direction in the FDS and TRPS Change 1. In particular, they do not provide clarity on the quantum of commercial land required or where that development should be located. This creates ongoing uncertainty for applicants, decision-makers, and the community. In the absence of a clear framework, there is an increased risk of ad hoc or	The level of uncertainty and risk associated with this option is moderate. Introducing objective 6.6.2.3 would reduce uncertainty in relation to the provision of sufficient commercial land capacity, providing greater confidence that long-term demand can be met. However, without objective 6.6.2.4, uncertainty would remain in relation to how and where that capacity should be realised. The Plan would lack a clear framework to direct commercial development across a hierarchy of centres, leaving continued ambiguity for plan users and decision-makers.

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
	certainty that sufficient commercial land capacity will be enabled to meet demand over the long term. Objective 6.6.2.4 provides clarity on the role and function of centres through a defined hierarchy, addressing known gaps in the current framework that have been identified in private plan change processes. Tasman is experiencing significant growth, which increases the risk of uncoordinated or dispersed commercial development. The introduction of a centres hierarchy, supported by policies and methods, reduces this risk by clearly directing where different forms of commercial activity should be located. Overall, this option reduces uncertainty for plan users and decision-makers and mitigates the risk of adverse outcomes, including the erosion of town centre vitality and inefficient use of land and infrastructure.	out-of-centre commercial development, including large format retail. This has the potential to undermine the role, function, and vitality of established centres, and to result in inefficient land use and infrastructure outcomes. Reliance on the status quo would therefore perpetuate existing uncertainty and expose the Council to continued risk in managing commercial development under conditions of ongoing growth.	As a result, there would still be a risk of dispersed or uncoordinated commercial development, including the potential for adverse effects on the function and vitality of existing centres and the inefficient use of land, including rural land. While this option reduces some uncertainty compared with the status quo, it does not fully address the identified risks, particularly those associated with the spatial distribution of commercial activities.
Realistically able to be achieved within Council's powers, skills and resources	Including more expansive commercial objectives as part of PC81 is within the Council's powers and responsibilities. The concept of consolidated centres was adopted in Tasman's FDS which also went through a comprehensive public consultation process. This means the concepts are not new to the community.	The status quo position on TRMP commercial objectives would be easier to implement as it would involve fewer changes to TRMP as part of PC81. This would be within Council's powers and responsibilities. However a lack of alignment with the FDS's objectives and TRPS C1's proposed objectives would remain.	It is within Council's powers, skills and resources to introduce only one high level new commercial objective, to improve alignment with the NPS-UD. However since a plan change is proposed anyway, it is efficient to give fuller effect to higher order documents and expand the scope of new commercial objectives, to protect the

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
			vitality of Tasman's existing centres following a period of high population growth.
Acceptability:			
Consistent with identified iwi/Māori and community outcomes	While ngā iwi management plans do not specifically reference commercial development, some refer to urban development. Ngāti Tama's plan and the Ngā Taonga Tuku Iho Ki Whakatu Management Plan acknowledge the pressures on whenua and seek for urban development to be contained within urban zones and for productive rural areas to be protected from development. Proposed objective 6.6.2.4 is therefore consistent with these objectives. PC81 is in alignment with the adopted FDS objective 2. Ngā iwi were extensively involved in the preparation of the FDS. The concept of consolidated centres was adopted in Tasman's FDS which went through a comprehensive public consultation process. New concepts are not being introduced. In 2020 Council undertook a residents' survey on the use of and satisfaction with each of Tasman's town centres. For Richmond this showed that the evening attractions were the aspect respondents liked least, which was unsurprising given the limited offer. Other objectives and	To rely on the existing commercial objectives is not inconsistent with ngā iwi preferences or community aspirations. However they do not give full effect to the adopted FDS, on which ngā iwi were thoroughly consulted.	By only including the high level objective on providing sufficient commercial land capacity, (6.6.2.3) this would not fully reflect some ngā iwi management plans, which reference the pressures on whenua and seek for containment of urban development. Proposed objective 6.6.2.4, the second more detailed proposed objective, is consistent with such principles.

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
	policies of PC81 seek to enable more residents to live in Richmond town centre, through intensification of housing. Protecting the centre's role and function and thereby encouraging an increased commercial offer in the town, supporting evening and night time economies is complementary to these residential objectives. The same is true of Motueka. The 2020 survey's results for Motueka similarly reflected a limited night-time economy and PC81 contains proposals to intensify housing in its centre.		
Will not result in unjustifiably high costs on the community or parts of the community	The costs associated with this option are not unjustifiably high. PC81 is a comprehensive plan change involving a substantial programme of work. However, these costs arise from the need to meet statutory obligations under the RMA and to give effect to higher-order planning instruments. PC81 has been prepared concurrently with TRPS Change 1, which reduces administrative and process costs compared with undertaking separate plan changes, while ensuring consistency between regional and district planning frameworks. In terms of the outcomes enabled by PC81, the proposed objectives support the provision of commercial land to	The costs associated with this option may not be immediately apparent in plan-making terms, but the longer-term costs to the community are likely to be high and potentially unjustified. The existing objectives do not provide clear direction on the location or scale of commercial development. As a result, there is a risk of dispersed or out-of-centre development occurring in an uncoordinated manner. This can result in indirect costs to the community, including reduced accessibility to services, increased travel distances, and reduced efficiency in the use of infrastructure. There is also a risk that the viability and function of established centres could be	This option may result in lower short-term plan-making and compliance costs compared with the full suite, due to reduced changes to the TRMP framework. However, by not including objective 6.6.2.4, the Plan would lack a mechanism to manage the spatial distribution of commercial development. This creates a risk of inefficient or dispersed development patterns, including increased reliance on private vehicle travel and the potential loss of opportunities to consolidate activities in well-located centres. These outcomes could generate higher long-term costs for the community, including increased infrastructure

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2			
	meet the needs of a growing population and enable employment opportunities within Tasman's urban areas. This contributes to well-functioning urban environments and positive social and economic outcomes. The enabling nature of the provisions is also likely to reduce transaction costs for plan users by providing clearer direction for where commercial development can occur. Site selection processes and supporting assessments have sought to avoid or minimise environmental costs. Overall, while there are costs associated with implementing the plan change, these are justified by the benefits of providing development capacity, improving certainty, and supporting sustainable urban growth.	undermined, limiting their ability to provide social and economic benefits to surrounding communities. Accordingly, while the status quo avoids the immediate costs of plan change, it exposes the community to potentially higher long-term economic, environmental, and social costs that are not justified.	demand, reduced accessibility, and diminished centre vitality. While this option reduces some upfront costs, it does not adequately avoid longer-term costs, which may therefore be unjustifiably high when compared with the more coordinated approach provided by the full suite of objectives.
Overall assessment of the appropriateness of proposed new Objectives 6.4A.2.1 and 6.4A.2.2 and amended Objectives 5.4.2, 6.6.2.2 and 6.7.2			
The proposed objectives assessed in this table respond directly to the two key resource management issues identified: • the requirement to provide sufficient commercial land capacity to meet demand over the long term; and • as urban areas grow and change, the risk that the vibrancy and efficiency of town centres may be undermined by dispersed or ad hoc commercial development. Option (a) addresses both of these issues. In contrast, options (b) and (c) do not address the second issue, as they do not provide a clear framework to direct the distribution of commercial growth or clarify Council's intended role and function for its centres. Option (a) best achieves the purpose of the Act by promoting the sustainable management of natural and physical resources, including through the efficient use of urban land and infrastructure and the avoidance of adverse effects associated with uncoordinated commercial development. The proposed objectives are also consistent with iwi management plans where urban development is addressed.			

Proposed objectives on land for commercial activities 6.6.2.3 and 6.6.2.4 and amendment of existing objectives 5.4.2, 6.6.2.2 and 6.7.2
Option (a) assists the Council to carry out its statutory functions under the RMA, including both the requirement to provide sufficient development capacity for business land and the broader function of integrated management of land use. It also gives effect to the NPS-UD by supporting well-functioning urban environments and has regard to the direction in TRPS Change 1 and the Future Development Strategy. The proposed approach is supported by a robust evidence base, including engagement undertaken through PC81, a survey of town centre use, and the preparation of the Richmond Spatial Plan and Māpua Masterplan. These processes have confirmed the role of centres and highlighted existing deficiencies. In addition, recent private plan change processes have identified a lack of clarity in the current framework, reinforcing the need for clearer direction on the role and function of centres. Option (a) responds to these issues. The amendments to existing objectives proposed through PC81 are largely consequential, but they improve alignment with the new commercial objectives, particularly objective 6.6.2.4, and support a more coherent and integrated policy framework.

9.5 Appropriateness of two new objectives on papakāinga

Table 13 Appropriateness Assessment - Papakainga

Proposed objectives on papakāinga 10A.2.1, 10A.2.2	
10A.2.1 Papakāinga development is enabled as a taonga that: (a) empowers and enables tāngata whenua to live on their ancestral land; (b) sustains their culture, traditions, and connection to place; and (c) supports their social, economic, and cultural wellbeing in accordance with tikanga Māori. 10A.2.2 Tāngata whenua are supported to exercise rangatiratanga over the development and use of their ancestral land through papakāinga that reflect their aspirations, tikanga and values.	
General intent of new objectives:	
The new objectives seek to address barriers facing tāngata whenua in developing and using their ancestral land by enabling papakāinga development in a way that reflects tikanga Māori and supports current and future generations. The objectives recognise papakāinga as a taonga and provide a clear policy framework to empower tāngata whenua to exercise rangatiratanga over their land, including through development that sustains cultural connections and supports social, economic, and cultural wellbeing. The recent release of the National Environmental Standards for Papakāinga (NES-P) provides a nationally consistent set of rules to enable papakāinga development. However, as the NES-P does not include objectives or policies, there remains a need for a local policy framework within the TRMP. The proposed objectives therefore complement the NES-P by setting out the intended outcomes for papakāinga development in Tasman and ensuring that local aspirations, values, and context are appropriately reflected.	
Other objective options	
Status quo: Do not update the TRMP with a new package of provisions instead relying on its existing provisions giving effect to the NPS-UD Alternative: Amend the TRMP but with fewer objectives and less prescription with one new objective only (10A.2.1)	
Existing relevant objectives in the Plan:	
6.1.2.1 Urban buildings, places, spaces and networks that together, by design, sustain towns as successful places to live, work and play.	Objective 6.1.2.1 indirectly supports papakāinga in urban environments but doesn't directly refer to papakāinga development which makes the policy pathway for papakāinga development uncertain.
6.1.2.2 A wide range of living opportunities in urban locations that incorporate urban design principles.	Objective 6.1.2.2 does not directly address papakāinga development, or acknowledge that the design of papakāinga developments will incorporate design principles in accordance with tikanga Māori, which may differ from typical urban design principles.

Proposed objectives on papakāinga 10A.2.1, 10A.2.2	
6.2.2.2 Urban growth and sufficient opportunities, including redevelopment opportunities that encourage more efficient use of land, energy and provision of infrastructure, services and amenities.	Objective 6.2.2.2 indirectly supports papakāinga as this form of multi-unit development is usually a more efficient use of land than single unit developments, however the objective does not directly address papakāinga development which makes the application of this objective and policy pathway for papakāinga development uncertain.
6.7.2 maintenance and enhancement of the distinctive characters of urban settlements and integration between settlements and their adjoining landscapes	Objective 6.7.2 does not directly address papakāinga development, and the directive to maintain the characters of urban settlements adds to the barriers facing Tāngata whenua to develop and use their ancestral land with papakāinga development design led by Tāngata whenua. This objective does not align with the NPS-UD direction in policy 6 to recognize that amenity values of the urban and built form in areas planned for intensification (and papakāinga) develop and change over time (rather than maintaining and enhancing the existing amenity values of small towns, which currently contain few or no papakāinga developments).
7.2.2.1 Retention of opportunities to use rural land for activities other than plant and animal production, including rural living, rural residential, rural industrial, tourist services and papakāinga activities in restricted locations, while avoiding the loss of land of high productive value.	Objective 7.2.2.1 refers to retaining opportunities to use rural land for papakāinga activities while also avoiding the loss of land of high productive value. This objective does not address the barriers facing Tāngata whenua to develop and use their ancestral land in a way that enables their rangatiratanga.

	Proposed objectives option (a)	**Objective option (b) (Status quo)**	**Objective option (c)**
	Introduce new objectives to the TRMP to give effect to the NPS-UD and having regard to Council's FDS objectives and TRPS C1. The overall structure of the TRMP is retained but new objectives are added or existing ones amended	**Do not update the TRMP with new objectives instead relying on its existing objectives to give effect to the NPS-UD**	**Amend the TRMP but with fewer objectives, less prescription and implement the NPS-UD direction with a new overarching objective only (10A.2.1)**
Relevance:			

Proposed objectives on papakāinga 10A.2.1, 10A.2.2			
Directed to addressing a resource management issue	The proposed objectives 10A.2.1 and 10A.2.2 are directly directed to addressing the key resource management issues identified in section 4.1. Together, they address barriers to papakāinga development by explicitly enabling a greater range of activities associated with papakāinga and recognising it as a distinct form of development. Objective 10A.2.2, in particular, provides for the exercise of rangatiratanga by tāngata whenua over the development and use of their ancestral land, which is not provided for in the existing framework. The proposed objectives also establish a clear and coherent policy pathway for papakāinga development within the TRMP. This fills a gap in the current plan and reduces uncertainty and regulatory burden for plan users, particularly where resource consent is required. Overall, option (a) addresses both the need to enable papakāinga development and the need to remove barriers faced by tāngata whenua, and is therefore directly aligned with the identified resource management issues.	Reliance on the existing objectives would not address the identified resource management issues. While the existing objectives provide broad support for urban development and efficient land use, they do not directly recognise or enable papakāinga as a distinct form of development. As a result, they do not address the barriers facing tāngata whenua in developing and using their ancestral land, nor do they provide a clear or certain policy pathway for papakāinga development. This lack of direction has contributed to limited uptake of papakāinga development to date. Evidence from Council's Housing and Business Assessment (2024) indicates that unmet demand exists for papakāinga, which the current framework has not been able to respond to. The status quo would therefore not address the key resource management issues identified in section 4.1, including the need to enable papakāinga and reduce barriers to its development.	Amending the TRMP to include only objective 10A.2.1 would partially address the identified issues but would not fully do so. Objective 10A.2.1 would enable papakāinga development as a form of development and support improved outcomes by recognising it as a taonga. This would contribute toward meeting the intent of NPS-UD Policy 1 by enabling a greater range of housing options. However, without objective 10A.2.2, the Plan would not explicitly support tāngata whenua to exercise rangatiratanga over the development and use of their ancestral land. This is a key component of the identified issues in section 4.1. As a result, this option would only partially address the barriers to papakāinga development and would not fully give effect to relevant national direction, including NPS-UD Policy 9, which recognises the importance of Māori housing needs. Accordingly, option (c) would not fully address the identified resource management issues.
Focused on achieving the purpose of the Act	The proposed objectives are focused on achieving the purpose of the Act by promoting the sustainable management of natural and physical resources.	Reliance on the existing objectives does not adequately achieve the purpose of the Act in relation to papakāinga development.	Including only objective 10A.2.1 would contribute to achieving the purpose of the Act, but to a lesser extent than option (a).

Proposed objectives on papakāinga 10A.2.1, 10A.2.2			
	They enable papakāinga development in a way that provides for the social, economic, and cultural wellbeing of tāngata whenua and their communities, consistent with section 5 of the Act. The objectives also recognise and provide for matters of national importance under section 6, in particular the relationship of Māori and their culture and traditions with their ancestral lands, water, sites, waahi tapu, and other taonga (section 6(e)). By enabling papakāinga development on ancestral land and supporting the exercise of rangatiratanga, the proposed objectives give explicit effect to this matter. In addition, the objectives take into account the principles of Te Tiriti o Waitangi in accordance with section 8 of the Act, through supporting tāngata whenua to determine how their land is developed and used in accordance with tikanga Māori. Overall, option (a) provides a comprehensive framework that aligns with sections 5, 6 and 8 of the Act.	While the existing objectives support general urban development and efficient land use, they do not explicitly enable papakāinga or recognise the relationship of tāngata whenua with their ancestral land. As a result, they do not sufficiently provide for the social, economic and cultural wellbeing of Māori in this context (section 5). They also do not give effect to section 6(e), as there is no clear recognition of papakāinga as a means by which the relationship between tāngata whenua and their ancestral land can be maintained and strengthened. Further, the absence of explicit support for rangatiratanga means that the principles of Te Tiriti o Waitangi are not fully taken into account (section 8). Accordingly, the status quo does not adequately promote the sustainable management of resources in relation to papakāinga development.	Objective 10A.2.1 enables papakāinga development and recognises its importance as a taonga, supporting social, economic and cultural wellbeing in accordance with section 5. It also contributes to recognising the relationship of tāngata whenua with their ancestral land (section 6(e)). However, without objective 10A.2.2, the Plan would not explicitly support tāngata whenua to exercise rangatiratanga over the development and use of their land. As a result, the principles of Te Tiriti o Waitangi would not be taken into account to the same extent as in option (a) (section 8). This option would therefore only partially achieve the purpose of the Act, as it enables papakāinga development but does not fully provide for the exercise of rangatiratanga or the broader relationship between tāngata whenua and their land.
Assists the Council to carry out is statutory functions (RMA s.30 and s.31)	The proposed objectives (and the policies and methods below them) enable the development of papakāinga housing, which assists Council to carry out its housing land capacity functions.	The existing TRMP objectives alone do not provide sufficient context to explain how Tasman might provide sufficient capacity to meet demand for	If only objective 10A.2.1 was proposed, (enabling papakāinga), without supporting the exercise of Tāngata Whenua rangatiratanga over the use and development of papakāinga, the resulting

Proposed objectives on papakāinga 10A.2.1, 10A.2.2			
	The two proposed objectives enable policies and methods to be proposed which will provide sufficient land capacity to meet expected demand for papakāinga. The proposed new objectives therefore directly assist the Council with carrying out its statutory functions.	papakāinga housing. The existing objectives do not address papakāinga development specifically. Without these new objectives, (and policies and methods below them) Tasman would doubtless continue to provide insufficient papakāinga in its urban environment, as its most recent HBA has demonstrated.	provisions would not provide for as much papakāinga capacity. They would also not fully align with the NPS-UD and the objectives of Council's adopted FDS, to the same extent as option (a).
Within scope of higher-level documents	The proposed objectives assist the Council in carrying out its statutory functions under section 31 of the RMA. In particular, section 31(1)(aa) requires territorial authorities to ensure sufficient development capacity for housing. The proposed objectives enable policies and methods that support the provision of papakāinga housing, contributing to meeting demand and improving capacity for this form of development. In addition, the proposed objectives support the integrated management of land use under section 31(1). By recognising papakāinga as a distinct form of development and supporting tāngata whenua to exercise rangatiratanga over their ancestral land, they provide a framework for how land can be used and developed in a coordinated way that reflects tikanga Māori and local context.	The existing TRMP objectives do not adequately assist the Council in carrying out its statutory functions in relation to papakāinga development. While they support general urban growth and land use, they do not provide a clear framework for enabling papakāinga or addressing the specific barriers faced by tāngata whenua. As a result, they do not effectively contribute to meeting housing capacity needs for papakāinga under section 31(1)(aa). The absence of clear direction also limits the Council's ability to manage the development of papakāinga in an integrated way under section 31(1), as there is no explicit recognition of its distinct characteristics or outcomes. Evidence from recent housing assessments indicates that existing provisions have not resulted in sufficient	Including only objective 10A.2.1 would partially assist the Council in carrying out its statutory functions. Objective 10A.2.1 would support the provision of papakāinga housing and therefore contribute to meeting development capacity requirements under section 31(1)(aa). However, without objective 10A.2.2, the Plan would not explicitly support tāngata whenua to exercise rangatiratanga over the development and use of their land. This limits the extent to which the Plan provides for integrated management under section 31(1), particularly in relation to development outcomes that are led by tāngata whenua and reflect tikanga Māori. As a result, this option would only partially assist the Council in carrying out its statutory functions, as it addresses capacity but does not fully provide a framework for

Proposed objectives on papakāinga 10A.2.1, 10A.2.2			
	The proposed objectives therefore assist the Council to carry out both its development capacity and integrated management functions in a comprehensive manner.	papakāinga development to meet demand. Accordingly, the status quo does not adequately support the Council in carrying out its statutory functions.	integrated and culturally appropriate land use.
Feasibility:			
Acceptable level of uncertainty and risk	The level of uncertainty and risk associated with this option is low. Extensive engagement has been undertaken with ngā iwi, including multiple hui with the papakāinga working group and wider iwi representatives since July 2024. Feedback from this process has informed the drafting of the proposed objectives and associated provisions. Papakāinga has also been included in wider public engagement on PC81. The proposed objectives provide a clear and explicit framework for enabling papakāinga development, addressing known gaps in the current plan and reducing uncertainty for tāngata whenua, applicants, and decision-makers. The approach is consistent with national direction in the NPS-UD and aligns with the objectives of the FDS, both of which have been subject to consultation. Overall, this option reduces uncertainty through a well-informed and clearly articulated policy framework and	The existing objectives are general in nature and do not explicitly address papakāinga development. This creates uncertainty for plan users, particularly tāngata whenua seeking to develop ancestral land, as there is no clear or certain policy pathway. Reliance on the status quo would also increase the risk that Council is unable to meet demand for papakāinga development. Evidence from the 2024 Housing and Business Assessment indicates a shortfall in overall dwelling capacity, including papakāinga, which the current framework has not been able to address. In addition, the existing objectives do not fully align with more recent national and regional direction, increasing the risk of inconsistent or uncertain decision-making. Overall, this option would perpetuate existing uncertainty and increase the risk of continued under-delivery of papakāinga and associated outcomes.	The level of uncertainty and risk associated with this option is moderate. Introducing objective 10A.2.1 would reduce some uncertainty by providing explicit recognition of papakāinga development and enabling a clearer policy pathway than currently exists. However, without objective 10A.2.2, the framework would not clearly support tāngata whenua to exercise rangatiratanga or provide direction on how papakāinga development should reflect tikanga Māori and community aspirations. As a result, uncertainty would remain for both applicants and decision-makers, particularly where resource consent is required and where design and layout matters are central. This option would therefore reduce some of the current uncertainty but would not fully address the underlying risks identified through engagement and experience with existing provisions.

Proposed objectives on papakāinga 10A.2.1, 10A.2.2			
	mitigates the risk of continued under-provision of papakāinga development.		Overall, the risk of inconsistent or unclear outcomes would remain.
Realistically able to be achieved within Council's powers, skills and resources	This option is realistically able to be achieved within Council's powers, skills and resources. The preparation of objectives, policies and rules to manage land use is a core function of Council under the RMA. The TRMP already includes provisions for papakāinga development, meaning this option builds on an existing framework rather than introducing entirely new concepts. Council has the capability and experience to implement more detailed provisions, including those that recognise papakāinga as a distinct form of development and support tāngata whenua to exercise rangatiratanga. Overall, this option represents a straightforward extension and refinement of Council's existing functions and is fully achievable.	The status quo is also within Council's powers, skills and resources and would be relatively simple to maintain, as it does not involve changes to the TRMP. However, while it is easy to implement, it does not align with current statutory requirements or higher-order direction, including the NPS-UD and Council's adopted FDS. As a result, this option carries risks in terms of the adequacy of the planning framework, despite being administratively straightforward. Accordingly, while achievable, this option does not represent an appropriate use of Council's powers and resources.	Introducing only objective 10A.2.1 is also within Council's powers, skills and resources. However, as a plan change is being undertaken in any case, limiting the scope to a single high-level objective would not make efficient use of that process. It would only partially respond to higher-order direction and would not provide a complete framework for enabling papakāinga development. Including both objectives (10A.2.1 and 10A.2.2) is equally within Council's capability and provides a more comprehensive and effective outcome without requiring materially greater resources. Accordingly, while this option is achievable, it is less efficient and less complete than option (a).
Acceptability:			
Consistent with identified iwi/Māori and community outcomes	This option is most consistent with identified iwi/Māori and community outcomes. It aligns with the outcomes contained in iwi management plans identified in section 6.7 and reflects feedback from ngā	The status quo is not consistent with identified iwi/Māori and community outcomes. The existing objectives do not provide a clear pathway for papakāinga development and do not reflect the	This option would be partially consistent with identified iwi/Māori and community outcomes. Including objective 10A.2.1 would support enabling papakāinga development and respond to some of the outcomes identified

Proposed objectives on papakāinga 10A.2.1, 10A.2.2			
	iwi engagement summarised in section 3.3. In particular, it supports papakāinga development in a way that enables tāngata whenua to exercise rangatiratanga and develop land in accordance with tikanga Māori. The proposed objectives also respond to demonstrated demand for papakāinga identified in the Future Development Strategy and the 2024 Housing and Business Assessment. Feedback received through PC81 engagement indicates support for better enabling papakāinga development. Option (a) responds directly to that feedback by providing a clear and enabling framework. Overall, this option is well aligned with both iwi/Māori outcomes and broader community expectations.	outcomes sought by ngā iwi, as expressed through iwi management plans and engagement on PC81. Council has already adopted the FDS and undertaken the 2024 Housing and Business Assessment, both of which identify a shortfall in papakāinga development. Continuing to rely on the existing framework would not respond to these findings or to the expressed needs of tāngata whenua. As a result, this option would be unlikely to achieve a high level of community or political acceptance and would not align with identified outcomes.	through the FDS, HBA, and engagement processes. However, without objective 10A.2.2, the Plan would not explicitly support tāngata whenua to exercise rangatiratanga over the development and use of their land. This is a key aspect of iwi/Māori outcomes identified in iwi management plans and engagement feedback. Accordingly, while this option moves in the right direction, it would not fully align with identified iwi/Māori outcomes or community expectations.
Will not result in unjustifiably high costs on the community or parts of the community	The costs associated with this option are not unjustifiably high. As noted in Tables 9.2 and 9.3, PC81 involves significant costs. However, these costs are necessary to meet obligations under the RMA and higher-order planning documents. Undertaking PC81 concurrently with TRPS Change 1 improves efficiency and reduces overall administrative and process costs. Incorporating papakāinga provisions alongside residential intensification and	The status quo may avoid short-term plan-making costs, but is likely to result in unjustifiably high long-term costs to the community. Tasman is experiencing ongoing growth, and failure to plan for papakāinga development creates social and economic costs, particularly for Māori communities. Limited provision for papakāinga reduces access to appropriate housing options and	This option may result in lower short-term disruption and costs compared with the full suite of objectives. However, without objective 10A.2.2, the policy framework would be less comprehensive. This creates a risk of ongoing uncertainty, particularly where resource consents are required, which can increase transaction costs for Māori landowners seeking to develop papakāinga.

Proposed objectives on papakāinga 10A.2.1, 10A.2.2			
	commercial changes also provides efficiencies by addressing related issues through a single plan change process. The enabling nature of the proposed papakāinga provisions, supported by the new objectives, is expected to reduce transaction costs for plan users by providing a clearer and more certain pathway for papakāinga development. The development of permitted activity standards and supporting assessments has also helped to minimise environmental costs. Overall, while there are upfront costs, these are justified by improved outcomes, reduced regulatory uncertainty, and more efficient plan implementation.	constrains the ability of tāngata whenua to develop their ancestral land. There are also wider community costs where the housing market does not provide for a diversity of housing types, including papakāinga. Maintaining the status quo would continue the existing barriers faced by Māori landowners and perpetuate inefficiencies in the planning framework. Accordingly, while this option has lower immediate costs, it results in higher long-term costs that are not justified.	The lack of clear direction may also result in under-provision of papakāinga, with associated social and environmental costs, including reduced housing choice and inefficient use of land. While this option reduces some upfront costs, it does not fully avoid longer-term costs and inefficiencies, which may therefore be unjustifiably high compared with the more complete approach in option (a).
Overall assessment of the appropriateness of Objectives 10A.2.1, 10A.2.2			
The proposed objectives assessed in this table address the key resource management issues identified in section 4.1 above, namely that the operative TRMP imposes barriers to tāngata whenua using their ancestral land to develop papakāinga, including: • the complexity of the existing rules; • the lack of clear policy direction; and • overly constrained permitted activity provisions. The introduction of the National Environmental Standards for Papakāinga (NES-P) has addressed aspects of this issue by providing a nationally consistent set of enabling rules. However, as the NES-P focuses on rules rather than objectives or policies, it does not address the lack of local policy direction or the need to clearly articulate outcomes for papakāinga development in Tasman. The proposed objectives therefore complement the NES-P by providing that direction. Option (a) addresses these issues comprehensively by providing a clear and enabling policy framework for papakāinga development. In contrast, option (b) has not delivered papakāinga development to meet demand, as demonstrated in the 2024 Housing and Business Assessment, and option (c) would only partially reduce the barriers faced by tāngata whenua by providing an incomplete policy response.			

Proposed objectives on papakāinga 10A.2.1, 10A.2.2

Engagement with ngā iwi has identified papakāinga provision as a priority and confirmed that existing provisions are inadequate. Option (a) directly responds to these outcomes by supporting papakāinga development in a way that reflects tikanga Māori and enables the exercise of rangatiratanga.
Option (a) also best achieves the purpose of the Act by promoting the sustainable management of natural and physical resources, including through enabling development that provides for social, economic and cultural wellbeing and recognises the relationship of Māori with their ancestral land.

The proposed objectives under option (a) are within the scope of higher-level planning documents, give effect to the NPS-UD, and have regard to the adopted Future Development Strategy and proposed TRPS Change 1.

Overall, option (a) is the most appropriate way to achieve the objectives, as it provides a complete, clear, and effective framework to enable papakāinga development and address the identified resource management issues.

10. Assessment of the efficiency and effectiveness of the provisions in achieving the objectives

10.1 Evaluation of proposed Policies and Methods

Section 32 requires the territorial authority to evaluate whether the provisions of the proposal (policies, rules and other methods) are the most appropriate for achieving the objectives of the proposal, including identifying other reasonably practicable options and assessing the efficiency and effectiveness of the provisions of the proposal. This assessment draws on technical evidence contained in Appendices 2-28.

Section 5.0 of this report provides the three options that were considered for achieving the objectives. These options are now assessed in terms of costs, benefits, effectiveness and efficiency and risk of acting or not acting in Table 14 below.

Section 7.0 of this report provides a summary of the suite of proposed provisions for PC81. Appendix 1 provides a copy of the TRMP Schedule of Amendments and Maps.

"Reasonably practicable" is not defined in the RMA. *Royal Forest and Bird Protection Soc of New Zealand Inc v Whakatane District Council* [2017] NZEnvC 51 considered the meaning and found that it was appropriate to identify reasonably practicable options by reference to "among other things":

(a) the nature of the activity and its effects;

(b) the sensitivity of the receiving environment to adverse effects generally and to the identified effects of the activity in particular;

(c) the likelihood of adverse effects occurring;

(d) the financial implications and other effects on the environment of the option compared to other options;

(e) the current state of knowledge of the activity, its effects, the likelihood of adverse effects and the availability of suitable ways to avoid or mitigate those effects;

(f) the likelihood of success of the option; and

(g) an allowance for some tolerance in such considerations.

Where the purpose of the Act and the objectives of the plan can be met by a less restrictive regime then that regime should be adopted. This approach reflects the requirement to examine the efficiency of the provisions, *Wakatipu Environment Society Inc v Queenstown Lakes District Council* EnvC C153/04.

Likewise, efficiency and effectiveness are not defined in the RMA. The meaning of efficiency is often expressed in economic terms as considering the allocation of scarce resources. Effectiveness assesses the contribution new provisions make towards achieving the objective, and how successful they are likely to be in solving the problem they were designed to address.

Subsection (2) goes on to require identification of other reasonably practicable options, an assessment of the benefits and costs of environmental, economic, social, and cultural effects, and, where practicable, quantification of those benefits and costs. The level of detail in an evaluation must correspond to the scale and significance of the anticipated effects of the proposal's implementation.

Given the scale and significance of the proposals no separate economic evaluation to quantify the associated benefits and costs of the proposal was initially commissioned. A central theme underpinning the NPS-UD is provision of greater supply in the housing market will contribute to decreasing land cost over time because it reduces scarcity and competition in the market and therefore improves affordability for buyers and renters, along with other associated benefits linked to matters such as infrastructure-efficiency. Topic-specific s 32 assessments address economic costs and benefits in a qualitative sense, including those required under s 32(2). Since then, and at the direction of the Minister, TDC have obtained an economic assessment of the probable short, medium, and longer-term economic impacts of the Design Matrix on development uptake and regulatory certainty (Appendix 25).

Additionally, however, the key purpose and direction of PC81 (following TRPS C1) is to give effect to the NPS-UD which has clear objectives and policies, and to have regard to the FDS as the Nelson/Tasman growth strategy. Providing for intensification and reducing greenfield growth has been clearly demonstrated to reduce costs and have positive environmental and economic benefits.

In identifying the economic, environmental, social and cultural costs and benefits of the proposal, including opportunities for economic growth and the facilitation of employment opportunities, any potential adverse effects or opportunity costs are identified. The assessment also considers the risks of acting or not acting where information is uncertain or incomplete, adopting a proportionate level of analysis relative to the scale and significance of the anticipated effects, refer s 32(2).

In accordance with s 32 (1) (b) this section of the report examines whether the provisions in the proposal are the most appropriate way to achieve the objectives proposed in PC81. The evaluations are set out in the tables below titled, 'Evaluation of Proposed Policies and Methods' and are grouped according to purpose of the objectives:

1. Evaluation of provisions related to achieving the land for residential activities objectives,
2. Evaluation of provisions related to achieving the land for commercial activities objectives
3. Evaluation of provisions in achieving the papakāinga development objectives

10.2 Options assessment of individual sites

As stated, s32(1)(b) requires consideration of other reasonably practicable options for achieving the objectives. This requirement in relation to all proposed sites has been addressed in the Site Assessment Report (Appendix 2). The rezoning of land is a method by which to apply objectives, policies and rules to new areas of land. This is a component of Option A above (Introduce a suite of provisions).

Taking the sites determined through the FDS and masterplan processes and further additional and amended sites, Council considered the following option alternatives and applied relevant ones for evaluation purposes:

Option 1: Retain the status quo and retain the existing zoning.

Option 2: Rezoning land from its existing zone to a more appropriate zone.

Option 3: Downzoning land from an existing deferred zone that is considered inappropriate for urban use to its underlying (pre-deferral) zoning.

Option 4: Applying or amending spatial layers (other than zones) to sites.

Detailed information for each area was used to assess each site against relevant option alternative from the above. This included outlining the planning background, strategic context, servicing and infrastructure requirements (Appendix 3), natural hazard constraints and risk (Appendix 24), ngā iwi interests, community facilities, productive land status, and ecological values. The benefits and drawbacks of each site was assessed including retaining the current zoning and recommending a proposed option.

A preferred option for each individual site was selected based on this assessment and the analysis is provided in the Site Assessment Report in Appendix 2.

10.3 Evaluation of Suite of Residential Provisions in achieving the Land for Residential Activities objectives

In accordance with s 32 (1) (b) this section of the report examines whether the provisions in the proposal are the most appropriate way to achieve the objectives. These are the objectives proposed in PC81 and also the objectives in TRPS C1. The evaluation below assesses provisions related to achieving the land for residential activities objectives.

Table 14 Residential Provisions Evaluation

Evaluation of Suite of Residential Provisions in PC81, in achieving the Land for Residential Activities objectives 6.4A.2.1 and 6.4A.2.2, and amended objectives 6.1.2.1 and 11.1.2			
The Residential provisions in PC81 are significant. They include new definitions, new issues, new and amended objectives, many new policies and much amendment of existing issues and policies. They also include significant changes to the general rules chapter, zone rules, transportation provisions (access and support for multi-modal transport options) and information requirements for applications. The new MDRZ is introduced to achieve more intensive residential land use in both greenfield and brownfield intensification areas. OSPs are introduced as a new tool for guiding and streamlining the development of greenfield locations. A "Medium Density Residential Design Matrix" is also introduced for providing an basic level of urban design in brownfield locations. Changes are also proposed to the zone and area maps (refer Appendix 1). The amendments to the TRMP provisions are in Appendix 1 (Schedule of Amendments) and summarised in Section 7 above and Appendix 23.			
PROPOSED OPTION (a)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**
Introduce a suite of provisions in PC81 to give effect to the NPS-UD, also having regard to Council's FDS objectives, the TRPS C1 and MMP. The overall structure of the TRMP is retained but issues, objectives, policies and methods are added or existing ones amended.	**Environmental** Providing for urban growth to meet the requirements of the NPS-UD requires balancing competing resource management outcomes. Without that balance, environmental costs can arise, which would otherwise have been managed. The Future Development Strategy (FDS) seeks to achieve multiple objectives, including minimising impacts on the natural environment and enabling restoration opportunities. Most of the sites proposed for rezoning under PC81 are sites that were identified for growth in the FDS, and both adopted and additional sites have been assessed against these criteria (refer Appendix 8).	**Environmental** Enabling greater housing intensification in the MDRZ supports a more compact urban form, which can reduce reliance on private vehicles and enable greater use of public and active transport. This contributes to reduced greenhouse gas emissions over time. Accessibility to employment, services and amenities was assessed through the multi-criteria analysis undertaken for the FDS, which found the highest levels of accessibility in Richmond, followed by Motueka, and then Brightwater and Wakefield (refer Appendix 8). A more consolidated pattern of development reduces the need for greenfield expansion, limiting the extent of land required for urban growth and reducing associated	**MDRZ - Effectiveness** *Integrated regulatory framework* The proposed provisions are effective at achieving the objectives because they introduce a comprehensive and integrated package of policies, rules, zoning and methods that collectively enable intensive greenfield and infill (brownfield) residential growth in appropriate locations while managing effects. They provide for a well-functioning urban environment that at the same time supports competitive land and development markets. The Medium Density Residential Zone provisions, particularly Policies 6.4A.3.5–6.4A.3.14, establish a clear framework for intensification by enabling a greater level of built form intensity while ensuring that development contributes to well-functioning urban environments. This includes providing for a range of housing types, recognising changing amenity values, and enabling flexibility in how successful urban design outcomes are achieved. This integrated framework provides a coherent basis for implementing intensification across both existing urban areas and new growth areas, achieving the objectives. *Medium Density Residential Zone – enabling capacity and form*

	Some proposed growth areas contain highly productive land, particularly LUC 3. These areas are identified in Appendix 2. The FDS process concluded that there were no reasonably practicable alternatives to meet growth demand, given that many existing settlements are constrained in their ability to expand. Intensification can increase impervious surfaces and stormwater runoff. This can result not only in increased runoff volumes but also degraded water quality through contaminants entering receiving environments. In response, the MDRZ excludes areas subject to ponding and avoids key overland flow paths, reducing these risks through plan-enabled design controls. Additional development may increase traffic-related effects, including greenhouse gas emissions. However, modelling undertaken for the FDS indicates that the adopted spatial pattern has the potential to significantly reduce transport emissions over time compared with current patterns. Urban expansion and intensification can also give rise to incremental loss of rural openness and ecological values at settlement edges, including through vegetation clearance and habitat	environmental pressures. Locating development closer to existing services and infrastructure also improves accessibility and supports more efficient land use outcomes. More efficient use of existing infrastructure networks can also reduce the environmental footprint of development on a per-dwelling basis, by making better use of established transport, water, and community infrastructure systems (refer Appendix 3). The use of Outline Spatial Plans (OSPs) for larger greenfield sites provides a structured framework to guide development. OSPs enable coordinated land use, infrastructure provision, integrated transport networks, and environmental management, while allowing flexibility in how outcomes are achieved. This supports more efficient and environmentally responsive development, including better integration with natural features and transport systems (refer Appendix 1). Urban development can also enable environmental enhancements in some locations. This includes opportunities for restoration of streams, wetlands, and green corridors as part of development. In Māpua, for example,	The MDRZ is an effective method for delivering development capacity because it provides a dedicated and enabling zone that directly supports intensification. Compared to the existing TRMP provisions, it provides a more targeted and certain mechanism for delivering additional housing capacity. Policies 6.4A.3.5–6.4A.3.7 clearly link the zone to well-functioning urban environments by: • enabling a range of residential activities at greater intensity, • supporting a variety of housing types and densities, and • recognising that amenity values will change over time. This provides a clear and consistent framework for decision-making and ensures alignment between the objectives and the operational provisions of the plan. <u>*Design Matrix pathway (brownfield intensification)*</u> The design-led pathway for development within existing urban areas, as set out in Policies 6.4A.3.8(b) and 6.4A.3.13–6.4A.3.14, is an effective method for enabling intensification in brownfield locations. The Medium Density Residential Design Matrix provides a structured but flexible mechanism for achieving acceptable urban design and amenity outcomes. It recognises that such outcomes cannot be achieved through prescriptive standards alone, due to the interaction of multiple design variables and site-specific constraints. the Matrix improves certainty, reduces discretionary variability, and reallocates risk to design compliance. By enabling consent where the required Matrix score is achieved, the framework provides a high level of certainty for applicants while ensuring that development outcomes are consistent with the objectives. This reduces reliance on subjective assessment and supports consistent decision-making. Overall, this approach effectively balances flexibility and certainty, enabling a wide range of design solutions while maintaining appropriate controls over built form and amenity outcomes.

	disturbance. These effects are managed through the planning and assessment framework but cannot be entirely avoided. Enabling additional rural worker accommodation may also result in some loss of productive land. This risk is managed through the policy and rule framework, which increases scrutiny as activity intensity increases and discourages fragmentation through subdivision. **Economic** This option involves higher upfront administrative costs than maintaining the status quo, as it requires preparation and implementation of a comprehensive plan change alongside TRPS Change 1. There are also significant infrastructure costs associated with enabling both greenfield growth and intensification. These costs are shared between Council and developers. While most growth-related infrastructure is identified in the Long Term Plan, additional investment may be required over time, including where infrastructure needs to be delivered earlier than anticipated. This creates a funding and timing risk, particularly where growth outpaces planned	there is potential for wetland restoration associated with planned development areas, and site-specific measures such as restrictions on cats in parts of Seaton Valley are intended to support ecological outcomes and biodiversity protection. Infill housing can provide an efficient use of land in appropriate locations that reduces 'urban sprawl' and provides efficiencies. Overall, the proposed provisions enable development in a way that avoids, remedies or mitigates adverse environmental effects through the application of plan rules, design controls, and assessment processes. **Economic** Providing sufficient development capacity to meet projected demand supports the ongoing economic growth of the District. Tasman has experienced strong recent population growth and is expected to continue growing, increasing demand for housing and associated economic activity. PC81 enables the first stage of bringing land into the planning framework to respond to this demand, consistent with the Housing and Business Assessment 2024 (refer Appendix 4).	*Outline Spatial Plans (OSPs) – greenfield and large-scale development* The use of Outline Spatial Plans, as provided for in Policies 6.4A.3.8(a) and 6.4A.3.10–6.4A.3.12, is an effective method for guiding development in larger or more complex greenfield areas. OSPs provide a structured spatial planning framework for coordinating the layout of development, infrastructure, transport networks, reserves, and development sequencing. This ensures that development is integrated, efficient, and responsive to site-specific opportunities and constraints. Policies requiring minimum densities, comprehensive development, and the avoidance of fragmentation (including Policy 6.4A.3.9) ensure that the long-term development potential of these areas is maintained and that land is developed efficiently. This approach is particularly effective in ensuring that greenfield development contributes to well-functioning urban environments and avoids the inefficiencies associated with piecemeal development, while achieving the objectives. *Overall effectiveness* Overall, the MDRZ framework is effective because it provides two complementary pathways for development: • a design-based intensification pathway for existing urban areas; and • a spatial planning pathway for greenfield and large-scale development. These pathways operate within a coherent policy framework that enables development capacity, supports a range of housing types, and ensures that development is integrated and appropriately managed. As a result, the provisions are effective in achieving the relevant objectives and responding to the identified resource management issues. *Consistency with operative objectives*

	infrastructure delivery (refer Appendix 3). Greenfield development can enable more efficient infrastructure provision when designed at medium densities from the outset, whereas intensification tends to occur incrementally and may require more dispersed upgrades. There is also a risk that infrastructure capacity constraints could delay development if upgrades are not delivered in line with growth. While the MDRZ provides for increased development capacity, a cost can arise if not all enabled capacity is realised if development is not financially feasible in all locations or for all typologies. This may affect the timing and extent to which housing supply responds to demand. Developers will incur costs in responding to the MDRZ framework, including preparing design-led applications supported by plans and technical assessments. There may also be short-term adjustment costs as the development sector becomes familiar with the new provisions. These costs are in many senses routine and are expected to reduce over time as	Providing sufficient development capacity to meet projected demand supports the stability of the property market for owners and renters by supporting the supply-side of the supply/demand equation. This is particularly relevant in the context of population growth. Growth supports economic activity, particularly in the construction sector and associated industries, with wider productivity benefits across the local economy. Increased residential population in and around centres also supports local businesses by increasing demand for goods and services and reinforcing the role of centres identified in the FDS. By locating more housing closer to employment areas and services, the provisions can improve labour mobility and reduce travel times, supporting a more efficient functioning of the local economy. The MDRZ provisions and associated policy framework provide greater certainty for development. A more enabling and predictable consenting pathway, including non-notified processes for complying developments, is expected to reduce costs and risk for applicants. The Medium Density Residential Design	The Medium Density Residential Zone provisions are also effective in that they are consistent with, and give further effect to, relevant operative objectives of the TRMP. In particular, the provisions support Objectives 6.1.2.1 and 6.1.2.2 by enabling urban buildings, places and spaces that sustain towns as successful places to live, work and play, and by providing a wider range of living opportunities through increased housing choice and intensification supported by urban design outcomes. The provisions also give effect to Objectives 6.2.2.1 and 6.2.2.2 by promoting more efficient use of land and infrastructure, reducing the need for urban expansion onto highly productive land, and enabling redevelopment opportunities within existing urban areas. Through the integration of infrastructure considerations, density requirements, and comprehensive development pathways, the provisions are also consistent with Objective 6.3.2.1 by ensuring that urban growth occurs in a manner that is aligned with the capacity of services and infrastructure. In addition, the provisions incorporate consideration of transport and natural hazards, and are therefore consistent with Objectives 11.2.2 and 13.1.2.1, by requiring development to appropriately manage effects on transport networks, amenity and safety, and to avoid or mitigate risks associated with natural hazards. Overall, the Medium Density Residential Zone provisions form an integrated framework that not only achieves the proposed objectives, but also strengthens and updates the implementation of the operative objectives of the TRMP. **MDRZ - Efficiency** *Strategic alignment and coordinated implementation* The proposed provisions are efficient because they give effect to the NPS-UD while having regard to the FDS and aligning with TRPS Change 1. This ensures

	experience with the provisions increases. **Social** Intensification and more comprehensive forms of residential development may alter existing amenity values and neighbourhood character, which can be perceived as a loss by some current residents. However, the NPS-UD anticipates that amenity values will change as urban areas grow and intensify, and this is reflected in the proposed TRPS changes. Minimum density expectations in the MDRZ may also limit some forms of lower-density infill development, which could be perceived as a constraint by landowners seeking traditional subdivision outcomes. This reflects a deliberate shift toward more efficient use of scarce urban land. There is potential for adverse social effects if growth is not matched by adequate services and facilities. This includes situations where the delivery of community infrastructure, transport upgrades, or public amenities lags behind development. The social impact assessment identifies some existing gaps in provision, such as indoor community space in Richmond (refer Appendix 9).	Matrix supports this by providing clearer expectations and reducing the need for case-by-case design assessment (refer Appendix 15). The Design Matrix provides consenting efficiency benefits by improving certainty that applicants can advance proposals that achieve well-functioning urban environments without being subject to uncertain consenting processes and/or urban design review processes. Landowners benefit from increased development opportunities and potential uplift in land value associated with rezoning and intensification. This creates additional options for land use and investment. Transport-related provisions that support a shift to multi-modal travel can also deliver economic benefits by reducing congestion pressures over time, particularly in key growth areas such as Richmond. Infrastructure efficiencies, while less pronounced that those in large Tier 1 local authorities, are present on the basis that increased density reduces properties' cost share overall. It is recognised that these costs can vary depending on the extent this benefit arises is dependent on multiple	that development is directed to appropriate locations and reduces the risk of inefficient land use and poorly located development. By providing a clear regional and district planning framework, the provisions enable coordinated implementation through zoning, rules and development pathways, improving the overall efficiency of the planning system. *Design Matrix – reducing transaction costs* The MDRZ framework is efficient because it provides a high degree of certainty for both applicants and the Council by enabling applications to be assessed against clear and measurable criteria, reducing the need for extensive expert input and minimising processing time and cost. Where comprehensive development proposals achieve the required Matrix score, policy provisions support the granting of consent with a high level of confidence. The provisions therefore will reduce delays and uncertainty. Where they do not, the rules and policies allow for targeted and proportionate assessment without escalating activity status, supporting efficient decision-making. *Outline Spatial Plans – upfront coordination and infrastructure efficiency* OSPs improve efficiency by addressing key development requirements at an early stage. By establishing an agreed spatial framework for larger sites, they reduce duplication of assessment, minimise redesign, and enable more efficient infrastructure planning and delivery. This coordinated approach supports economies of scale, reduces infrastructure costs over time, and ensures that development is sequenced appropriately with servicing capacity. *Targeted plan change response* In the context of an outdated planning framework that does not adequately provide for growth, a focused plan change such as PC81 is an efficient response. It enables Council to meet its statutory obligations and respond to growth pressures without undertaking a full plan review.

	Intensification and redevelopment may also result in temporary disruption to existing communities through construction activity, including noise, traffic, and general disturbance over extended periods. There is some uncertainty in places about the ability to provide infrastructure that supports intensification provided for by the MDRZ and PC81 in general. If infrastructure is not in place when development proceeds there can be significant costs across all four categories assessed in this report. **Cultural** Engagement with ngā iwi has identified concerns regarding the effects of urban development on the natural environment and the potential for impacts on sites of cultural significance. These risks have been addressed through site selection, policy development, and ongoing engagement. The FDS and supporting assessments incorporated cultural considerations, including the relationship of development to natural systems and resources. Early engagement indicates that the proposed development areas generally avoid sites of known cultural	factors, e.g. proximity to main trunk infrastructure and if the development is infill. Enabling more flexible worker accommodation in rural areas supports key sectors of Tasman's economy, including horticulture, by improving the availability and suitability of accommodation for workers and supporting business continuity (refer Appendix 14). **Social** PC81 provides for increased housing supply and a wider range of housing types and locations. This supports improved housing choice and is intended to contribute to improved affordability over time, where supply is better aligned with demand (refer Appendix 4). The combination of greenfield and brownfield development provides for a mix of housing typologies, including standalone dwellings and more compact forms such as duplexes, townhouses, and apartments. This responds to community preferences identified through previous engagement while also providing options for different household types and life stages.	This targeted approach minimises cost and effort while delivering significant improvements in how urban development is planned and managed. *Overall efficiency* Overall, the proposed provisions improve efficiency by reducing uncertainty, improving coordination, and enabling more streamlined decision-making. By combining a clear regulatory framework with flexible and targeted implementation tools, the MDRZ approach reduces transaction costs, improves consistency, and supports the efficient delivery of development capacity across both brownfield and greenfield locations. **Infrastructure – Effectiveness** *Aligning development with infrastructure capacity* The proposed provisions are effective because they establish a clear and enforceable framework for aligning urban development with the capacity and availability of infrastructure. The approach recognises that infrastructure capacity is not uniform across all locations and that development must occur in a manner that is responsive to servicing constraints. This is implemented through a combination of zoning, policy direction, regulatory rules and powers (e.g. matters of control or restricted discretion) staging mechanisms, and supporting technical assessments, which together ensure that development is only enabled where it can be adequately serviced. In particular, the use of deferred zoning and staged development mechanisms provides a structured method for managing the release of land over time. This enables development capacity to be identified in advance, while ensuring that land is not prematurely developed before infrastructure is available. As infrastructure is funded and delivered through Council's Long-Term Plan and infrastructure programmes, deferred land can be released in a coordinated and planned manner. This approach is effective because it allows Council to manage growth proactively, ensuring that development occurs in the right locations, at the

	significance to Māori (refer Appendix 13). However, there remains a residual risk that previously unidentified sites or values may be affected as development proceeds. In addition, cumulative changes to land use and settlement patterns may affect cultural relationships with the wider landscape over time.	These provisions support outcomes for a range of groups, including first home buyers, smaller households, and older residents seeking to downsize and remain within their communities. Enabling ageing in place is a key outcome identified through FDS and local spatial planning processes. Increased residential density in main urban areas supports the vitality and viability of centres, strengthening their role as focal points for communities. Greater population density can support improved social interaction, increased use of public spaces, and more efficient provision of community facilities. The Social Impact Assessment identifies positive social outcomes associated with intensification, including increased vibrancy and cohesion, subject to appropriate provision of supporting infrastructure (refer Appendix 9). Provision for increased and better-managed worker accommodation also delivers social benefits by improving living conditions for seasonal workers and reducing pressure on existing housing and visitor accommodation stock. **Cultural** Providing a greater range of housing options, including more affordable and	right time, and in a manner that supports well-functioning urban environments. <u>*Enforceable infrastructure constraints at consent stage*</u> The effectiveness of the framework is strengthened through the inclusion of Policy 6.3.3.1A, which provides a clear basis for decision-making on resource consent applications where infrastructure constraints are present. This policy requires that development which imposes additional load or pressure on infrastructure is avoided unless the necessary infrastructure is in place to service it to an appropriate standard. This includes both transport infrastructure and three waters services, referencing recognised standards such as the Nelson Tasman Land Development Manual. This is an effective mechanism because it ensures that infrastructure constraints are not only identified at a strategic or zoning level, but are also directly applied at the consent stage. It enables consent planners to decline or constrain development where infrastructure is not available or adequate, ensuring that the outcomes anticipated by the plan are actually achieved in practice. Together with the zoning and staging framework, this provides a complete and functional system for managing the relationship between development and infrastructure. <u>*Managing sequencing and long-term development outcomes*</u> The provisions are also effective in managing the sequencing of development across the district. By linking the release of land and the approval of development to infrastructure capacity, they ensure that growth is coordinated with infrastructure investment and delivery. This avoids the risks associated with unplanned or market-led sequencing, where early development may consume limited infrastructure capacity in suboptimal locations or undermine longer-term planning outcomes. Instead, the framework promotes a deliberate and managed approach to growth that reflects both spatial planning objectives and infrastructure constraints.

		accessible housing, supports outcomes identified in iwi management plans and community engagement processes. By increasing housing capacity and enabling a wider variety of housing typologies, PC81 contributes to addressing barriers to home ownership and occupancy for Māori and the wider community. In doing so, it supports the ability of whānau to remain within their communities and maintain cultural connections to place. Engagement undertaken as part of PC81 and TRPS Change 1 has informed the approach to growth and development, helping to align the provisions with iwi values and aspirations where possible (refer Appendix 13).	The provisions recognise the need for flexibility in the provision of infrastructure and the potential for developer-led infrastructure solutions that can shift cost from Council to private interests, allowing development earlier than might be available if infrastructure is reliant on Council funding and implementation. Overall, the infrastructure provisions are effective because they ensure that development capacity is both enabled and controlled in a manner that supports efficient, coordinated and sustainable urban growth. <u>*Consistency with operative objectives*</u> The infrastructure provisions are also effective in that they are consistent with, and give further effect to, relevant operative objectives of the TRMP. In particular, the provisions give direct effect to Objective 6.3.2.1 by ensuring that urban growth is aligned with the capacity of infrastructure and services, and that development does not occur unless it can be adequately serviced. The provisions also support Objective 6.2.2.2 by promoting the efficient use of land and infrastructure through the coordinated sequencing and staged release of development. Where relevant, the provisions are also consistent with Objectives 11.2.2 and 13.1.2.1 by ensuring that development appropriately manages the effects of transport demand and avoids or mitigates risks associated with infrastructure-related hazards, such as stormwater and flooding constraints. Overall, the infrastructure framework strengthens the implementation of operative objectives by providing clear mechanisms to align development with infrastructure capacity and delivery. **Infrastructure – Efficiency** <u>*Efficient sequencing of land release*</u> The proposed approach is efficient because it enables development capacity to be identified and zoned in advance, while controlling the timing of development through infrastructure availability.

			The use of deferred zoning and staged release mechanisms allows land to be brought forward progressively over time, in alignment with infrastructure funding and delivery through Council's Long-Term Plan. This provides flexibility in responding to growth while maintaining control over development outcomes. By avoiding the premature development of unserviced land, the provisions reduce the risk of inefficient land use and the need for costly retrofitting or upgrades to infrastructure. *Reducing the need for further plan changes* The framework is also efficient because it is likely to reduce the need for additional plan changes to manage the release of land. By incorporating infrastructure sequencing and servicing requirements directly within the zoning and policy framework, the plan provides an enduring mechanism for managing growth over time. As infrastructure becomes available, development can proceed without the need for further rezoning or plan change processes. This reduces administrative costs, improves certainty for developers and the community, and enables a more responsive and efficient planning system. *Coordinated infrastructure investment and delivery* The alignment of land use planning with infrastructure capacity supports more efficient infrastructure investment and delivery. By ensuring that development is sequenced in accordance with infrastructure availability, the provisions: • reduce the risk of over- or under-investment in infrastructure, • enable more efficient timing of capital works, and • support integrated planning between land use and infrastructure systems. This coordinated approach minimises inefficiencies associated with unplanned growth, including duplication of infrastructure, underutilised assets, and the need for reactive upgrades.

			Overall efficiency Overall, the infrastructure framework is efficient because it provides a clear, coordinated and durable mechanism for managing the relationship between development and infrastructure. By combining advance zoning with control over the timing of development, and by providing clear direction at the consent stage through Policy 6.3.3.1A, the provisions reduce uncertainty, avoid inefficient development patterns, and enable infrastructure to be planned and delivered in a cost-effective manner over time. **Amenity – Effectiveness** The proposed provisions are effective in that they provide a clear and balanced framework for managing amenity values while enabling urban intensification. The policies in Section 5.2.3 address key components of amenity, including privacy, sunlight access, outdoor living space, landscaping, and the management of traffic, noise and visual effects. Importantly, the amendments recognise that amenity values will change as residential density increases, particularly within the Medium Density Residential Zone. This ensures that the provisions do not impose unrealistic low-density amenity expectations that would constrain intensification. Instead, they enable higher density development while maintaining appropriate amenity outcomes. The provisions therefore achieve a well-functioning urban environment that delivers development capacity while providing appropriate amenity outcomes. **Amenity – Efficiency** The proposed provisions are efficient because they provide a clear and consistent framework for managing amenity effects without unnecessarily constraining development.

			By explicitly recognising that amenity values evolve over time, the provisions reduce potential conflict between intensification objectives and amenity expectations. This improves certainty for plan users and supports more consistent decision-making. Efficiency is further supported through integration with development standards and tools such as the Medium Density Residential Design Matrix, which provide a structured but flexible method for achieving acceptable amenity outcomes. The provisions also reduce duplication by providing a coherent set of amenity directions across the plan, and support a more integrated approach alongside urban form and infrastructure provisions. Overall, the approach enables amenity to be managed in a proportionate and flexible way, supporting the efficient delivery of housing capacity while maintaining appropriate environmental quality.
Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions	**Risks of acting** The risk of acting on the proposed plan change is considered low, given the strength of the evidence base and the extent of prior planning and engagement. A significant amount of strategic planning and consultation has informed the proposed approach. This includes the FDS, the Richmond and Māpua Spatial Plans, the Housing and Business Assessments, and community engagement processes such as the Housing Preferences Survey 2021. Together, these provide a high degree of certainty regarding the preferred direction for urban development and the demand for a wider range of housing types. The evidence base underpinning PC81 is comprehensive and regularly updated. The Housing and Business Assessments, prepared on a three-year cycle, provide up-to-date information on development capacity and demand, while annual monitoring reports test assumptions over time. This supports confidence that the proposed provisions are appropriately targeted and responsive to growth pressures. Community and stakeholder feedback also indicates broad acceptance of intensification in appropriate locations. Submissions on the FDS show a majority of respondents either supporting or being neutral on intensification in key centres, including Richmond, Motueka, Brightwater, and Wakefield. This suggests that the proposed approach aligns with community expectations. The proposed MDRZ is also informed by experience gained through the Richmond Intensive Development Area, providing a tested basis for enabling intensification. Spatial and economic analysis associated with the Housing and Business Assessments demonstrates that reduced planning constraints can lead to increased demand for higher density development, supporting the effectiveness of the MDRZ approach.		

	Potential environmental risks, including flood hazard, are addressed through a risk-based framework within the provisions. Areas of highest risk have been excluded from zoning, areas of lesser risk are subject to case-by-case assessment, and residual risk can be managed through consent conditions. This enables intensification while appropriately managing hazard risk. Infrastructure-related risks are also managed through the structure of the provisions. Where servicing is not yet available, land is identified as deferred, meaning it is plan-enabled but not able to be developed until infrastructure capacity is in place. This ensures that development does not occur prematurely and that infrastructure constraints are addressed before growth is realised. Overall, the proposed provisions are supported by robust evidence, established planning processes, and a clear statutory framework. As a result, the likelihood of significant unforeseen adverse outcomes or implementation issues is low. **Risks of not acting** Not acting carries a significantly higher level of risk. The existing housing stock in Tasman is heavily skewed toward standalone dwellings, while there is demonstrated demand for a greater proportion of attached and more affordable housing types. Without intervention, this imbalance is likely to persist. The Housing and Business Assessment 2024 identifies a shortfall in both overall housing capacity and in medium-density typologies. Even with PC81, a deficit in attached dwellings is projected over the long term. Without the plan change, this shortfall would increase further, exacerbating affordability issues and limiting housing choice. The Nelson part of the joint Nelson/Tasman urban environment does not provide for intensification sufficient to provide for sufficient development capacity over at least the medium term. This creates increased pressure on housing stock in Tasman. Failure to provide sufficient housing capacity would also constrain economic growth. Housing availability is a key factor influencing the ability of businesses to attract and retain workers. Without adequate housing supply and diversity, labour shortages are likely to worsen, limiting business growth and reducing economic productivity. There is also a risk that, in the absence of more enabling provisions, development pressure would be directed toward less efficient or less appropriate locations. This could lead to greater loss of productive land and more scattered or uncoordinated development patterns. Retaining the current planning framework would also continue to create uncertainty and inefficiency in the consenting process for intensification, discouraging development and limiting the delivery of housing.

	Overall, the risks of not acting include ongoing housing shortages, reduced affordability, constrained economic growth, and poorer urban development outcomes.			
Economic Growth and Employment	The proposed residential provisions, including the MDRZ, are expected to support economic growth in the Tasman District by addressing housing supply constraints that have limited development in recent years. Evidence from the Housing and Business Assessment, the Richmond Spatial Plan, and the FDS indicates that insufficient housing capacity has constrained the ability of the District to fully respond to population growth and associated economic demand (refer Appendix 4). By enabling a greater supply and diversity of housing, particularly in accessible urban locations, the plan change is expected to stimulate construction activity and support the wider development sector, including trades, suppliers, and professional services. This activity generates flow-on economic benefits across the regional economy. A more consolidated urban form also increases the resident population base within and around existing centres, supporting local businesses, services, and commercial activity. This contributes to more resilient and sustainable economic growth over time. The plan change is also expected to support employment outcomes both directly and indirectly. Increased development activity will generate employment in the construction sector, while population growth in urban areas will increase demand for services, retail, and community facilities, supporting additional jobs. There is also a clear relationship between housing availability and labour market performance. Evidence indicates that housing constraints are already affecting the ability of businesses to attract and retain workers in the District. Feedback from the 2023 NRDA survey identifies housing, employment, and social conditions as a key factor influencing business performance. By improving housing supply and affordability, the plan change is expected to reduce these constraints, support labour mobility, and enable a more efficient and responsive local labour market.			
PROPOSED OPTION (b)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**	**Risk of acting or not acting**
Do not update the TRMP with a new package of residential provisions instead relying on its existing objectives, policies, and zoning framework to give	**Environmental** Retaining the status quo is likely to result in continued inefficient use of land resources. The existing intensification provisions introduced through Plan Change 66 are relatively conservative and have delivered only modest outcomes to date. While there has been a net gain of 89 dwellings between 2018 and 2024, these have	**Environmental** Retaining the status quo may provide some limited short-term environmental benefits by slowing the pace and scale of urban development. This could result in the temporary preservation of existing neighbourhood amenity and character, and reduce short-term construction-	**Effectiveness** Relying on the existing provisions of the TRMP would be less effective in achieving the relevant objectives. Without PC81, Council would have reduced control over the location, form, and quality of urban development. Growth pressures would remain, but development is more likely to occur through	**Risks of not acting** Council has a comprehensive evidence base to support the need for change, including the FDS, the Housing and Business Assessment 2024, feedback on PC81, the Māpua Masterplan, the Richmond Spatial

effect to the NPS-UD (status quo).	largely been low-density or single-storey developments and have not achieved the level of intensification now required. The current provisions are also geographically limited, applying primarily to the Richmond Intensive Development Area. In contrast, broader opportunities for intensification across other urban areas would remain unrealised under the status quo. In a growing district, failure to enable sufficient intensification will increase reliance on greenfield expansion. This results in greater consumption of land for urban purposes and associated environmental pressures, including loss of rural land and increased infrastructure demand. Accessibility analysis undertaken for the FDS shows that areas such as Richmond are highly suitable for intensification due to proximity to employment, services, and transport options (refer Appendix 8). Continuing to develop these areas at lower densities reduces the potential for accessible, compact urban form and limits uptake of public and active transport, resulting in poorer environmental outcomes. The absence of stronger transport-related provisions, including requirements for end-of-trip facilities, may further limit uptake of active	related effects such as emissions, noise, and disruption. Slower rates of development may also ease immediate pressure on infrastructure and natural systems, allowing more time for environmental processes to adjust. However, these benefits are likely to be limited and temporary. In a context of continued population growth, demand for housing will persist. Without a coordinated planning response, this demand is likely to be met through less efficient or more dispersed development patterns, including greater reliance on greenfield expansion and ad hoc proposals. Over time, these outcomes are likely to undermine any short-term environmental gains and result in less sustainable land use outcomes overall. Economic Maintaining the status quo avoids the immediate costs associated with preparing and implementing a plan change. This represents a short-term administrative saving for Council. There may also be lower short-term infrastructure expenditure, as the absence of a proactive planning response could delay the need for investment in growth-related infrastructure. However, these benefits are limited to the short term and do not address underlying demand or longer-term	individual resource consents or private plan changes. This can result in more fragmented and less coordinated outcomes compared to a comprehensive, plan-led approach. The current objectives and policies relating to urban development are relatively broad and do not provide sufficient direction on the need for housing diversity or the prioritisation of locations for intensification. In particular, they do not adequately address the demand for smaller and more compact housing typologies or provide clear guidance on where medium density development should occur. While Plan Change 66 introduced some intensification opportunities within the Richmond Intensive Development Area, the outcomes to date have been limited. The scale and form of development enabled under these provisions has not been sufficient to meet identified housing demand or deliver the level of intensification anticipated through the FDS. A review of the RIDA provisions identified that the rules are relatively complex and can reduce their overall effectiveness. The reliance on design-based assessment and discretionary processes introduces uncertainty and can limit uptake of development opportunities.	Plan, and surveys such as the Housing Preferences Survey 2021. This evidence demonstrates a clear mismatch between existing housing supply and demand. The current housing stock in Tasman is heavily skewed toward stand-alone dwellings, while there is a demonstrated need for a greater proportion of attached and smaller housing types. Medium density development provides an opportunity to deliver this form of housing, including duplexes, terraced houses, and low-rise apartments. The Housing and Business Assessment identifies a significant shortfall in both overall housing capacity and in attached dwelling typologies. This includes a long-term shortfall in smaller attached dwellings and a medium-term shortfall in overall capacity, even with the additional capacity enabled through PC81. When considered alongside the Nelson City urban area, the combined shortfall increases further. If Council does not proceed with the plan change, these deficits will increase, exacerbating existing

	transport. This reduces the effectiveness of broader transport objectives and reinforces reliance on private vehicles. Economic The existing TRMP does not provide sufficient zoned land or intensification capacity to meet projected housing demand over the medium term. Without change, the shortfall identified in the Housing and Business Assessment will increase, placing further upward pressure on house prices and reducing affordability (refer Appendix 4). Housing constraints also have direct economic implications. Limited housing availability can restrict labour supply, making it more difficult for businesses to attract and retain employees. This affects a range of sectors, including primary production, where access to worker accommodation is critical (refer Appendix 14). The current provisions are also less aligned with statutory obligations to provide sufficient development capacity, creating a risk that the planning framework is not effectively implementing existing objectives relating to housing supply. From an infrastructure perspective, maintaining the status quo creates uncertainty about the timing and recovery of infrastructure investment.	infrastructure requirements, which are likely to arise regardless of the planning approach. Social For some members of the community, retaining the current planning framework may be perceived as a benefit, particularly by those who wish to limit or avoid further urban growth or intensification. This may include a preference for maintaining existing neighbourhood character and lower-density living environments. However, these perceived benefits are not consistent with the broader needs of the community or with Council's statutory responsibilities to provide for growth and development capacity. Cultural No significant cultural benefits have been identified for this option. While retaining the status quo may delay development in some locations, it does not remove underlying growth pressures. Urban development demand is likely to continue through private plan changes or resource consent processes, where outcomes may be less coordinated. As a result, there are no clear cultural advantages associated with this approach.	The continued use of urban design panels, while providing independent advice, does not form part of the statutory decision-making framework. This can reduce the effectiveness of the current approach where advice is not clearly linked to enforceable outcomes. Overall, the status quo is unlikely to be effective in delivering sufficient housing capacity, particularly medium density housing, or in achieving coordinated and well-planned urban growth. Efficiency Maintaining the status quo is less efficient than implementing a targeted plan change. The existing TRMP provisions rely on case-by-case, design-led assessment for intensification proposals. Where provisions are unclear or lack measurable standards, this can lead to disagreement between applicants and Council, increased processing time, and higher costs for both parties. In contrast to a structured framework such as the MDRZ, the current provisions do not provide clear or consistent pathways for development. This results in increased transaction costs, uncertainty, and inefficiencies in the resource consent process.	housing supply and affordability issues (refer Appendix 4). Retaining the current planning framework also perpetuates uncertainty in the delivery of medium density development. The existing resource consent regime relies on broad and largely subjective assessment matters. These are expressed as general principles rather than clear and measurable outcomes, which can lead to inconsistent decision-making and increased uncertainty for applicants. In the absence of a more structured framework such as the MDRZ and Design Matrix, there is a risk that suitable intensification opportunities will not be realised, or will be delivered in a less consistent and predictable manner. This reduces the ability to achieve high-quality, liveable outcomes in higher-density environments. Overall, the risks of not acting include worsening housing shortfalls, reduced delivery of medium density development, and continued uncertainty in the planning and consenting framework.

	Without a coordinated planning response to growth, infrastructure delivery is more reactive, potentially increasing costs for Council and ratepayers. The existing consenting framework for intensification can also give rise to higher costs. Reliance on broad assessment matters and voluntary urban design panel processes can lead to increased use of external expertise and longer processing timeframes. These costs fall on both Council and applicants and reflect a less efficient regulatory system compared to a more structured and certain framework. Social The social impact assessment prepared for PC81 identifies a range of benefits associated with enabling greater housing supply and diversity, particularly through the MDRZ. Under the status quo, these benefits are unlikely to be realised (refer Appendix 9). If intensification is not further enabled, demand for housing will remain unmet, placing continued pressure on house prices and reducing accessibility to housing for many members of the community. The current limited supply of housing also constrains housing choice, particularly for smaller households, first home buyers, and older residents		The reliance on external tools such as urban design panels can also increase costs to Council, particularly where additional expertise is required to assess proposals. These costs are ultimately borne by ratepayers. From a broader planning perspective, not updating the TRMP to respond to the NPS-UD while awaiting future legislative reform is also inefficient. There is a substantial time lag between current planning needs and any future plan-making framework. In the interim, failure to act would prevent Council from responding effectively to identified housing demand and growth pressures. The absence of updated provisions also means that key efficiencies associated with integrated land use and infrastructure planning are not realised. Development is more likely to occur in a piecemeal manner, reducing opportunities for coordinated infrastructure provision and efficient urban form. Overall, relying on the status quo results in higher long-term costs, increased uncertainty, and less efficient delivery of housing and urban development outcomes.	

	seeking more compact or accessible forms of housing. The existing provisions relating to worker accommodation are also outdated. This imposes ongoing social and economic costs on both employers and workers, particularly in sectors reliant on seasonal labour. In the absence of change, these issues are likely to persist, including pressure on accommodation availability and suitability. Cultural The social impact assessment highlights that increased population density and diversity of housing can support stronger, more vibrant communities and provide opportunities for increased social interaction and community activity. Under the status quo, the relatively low levels of intensification are likely to limit these outcomes. Slower population growth within urban centres reduces opportunities for community cohesion, cultural expression, and the development of more diverse and active urban environments. As a result, potential cultural and community benefits associated with more compact and vibrant centres may not be fully realised.			

Economic Growth and Employment of proposed objective (b)	Failing to plan for additional housing capacity is likely to constrain economic growth in a region where population growth is projected to continue. Insufficient housing supply limits development activity, particularly in the construction sector and associated industries, and reduces the wider economic benefits that arise from increased housing provision, including productivity gains and local spending. There is also a direct relationship between housing availability and employment outcomes. Maintaining the status quo is likely to exacerbate existing difficulties in attracting and retaining workers, as employees struggle to find suitable and affordable accommodation within the District. Business feedback indicates that housing, employment, and social conditions are among the most important factors influencing business performance. Without addressing housing supply constraints, these issues will persist, limiting labour market accessibility and constraining business growth and expansion.			
PROPOSED OPTION (c)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**	**Risk of acting or not acting**
Amend the TRMP but with fewer provisions introduced and less prescription, with overarching objective 6.4A.2.1[5] **and policies only, relying on existing methods for intensification, omitting further zoned land or new rules.**	**Environmental** Relying on existing methods for intensification would likely result in continued low rates of uptake. Under the current RIDA rules, intensification has occurred at a relatively modest rate, indicating that existing provisions are not delivering the scale of development required. Without the introduction of the MDRZ across Tasman's main towns, opportunities to increase housing capacity within existing urban areas would not be fully realised. As a result, the District would remain more reliant on greenfield expansion to meet demand, increasing the consumption	**Environmental** A lighter-touch approach may provide some limited short-term environmental benefits by avoiding additional zoning of land for urban development. This could reduce the immediate scale and pace of development and allow greater scrutiny of environmental effects through existing processes. However, Council is required to provide sufficient development capacity and enable well-functioning urban environments. As demand for housing continues, development pressures would remain regardless of whether additional zoning or	**Effectiveness** A lighter-touch approach relying on objectives and policies, without new rules or zoning, is less effective in achieving the relevant objectives. Review of the Plan Change 66 provisions identified a lack of clarity regarding the intended outcomes for medium density housing. This creates uncertainty for the development sector and can discourage uptake. In practice, consultants often rely primarily on rules rather than objectives and policies, meaning that a policy-led approach alone is unlikely to	Risks of acting The risks of acting under this option are relatively low, as it involves only a partial update to the TRMP through the introduction of higher-level objectives and policies without a comprehensive suite of new provisions. However, this also limits the ability of Council to actively manage growth. By not introducing more directive methods such as new zoning, the MDRZ, or supporting tools such as Outline Spatial Plans, the approach relies heavily on

[5] Proposed Objective 6.4A.2.1: "*Sufficient residential capacity to meet demand in the urban environment and rural centres*."

	of land and associated environmental pressures. In the absence of Outline Spatial Plans (OSPs) for larger, undeveloped sites, there is also a risk that development would occur in a less coordinated and efficient manner. This increases the likelihood of suboptimal urban form outcomes and inefficient use of land, particularly where lower-density development is pursued on sites that could accommodate higher-density housing. This in turn places further pressure on additional greenfield expansion. **Economic** A lighter-touch approach relying on objectives and policies only would provide less certainty regarding the timing and delivery of development. In particular, uncertainty would remain regarding when infrastructure investment can be recovered through development contributions, potentially increasing financial risk for Council and ratepayers. The absence of additional zoning and more directive provisions is likely to result in a greater number of ad hoc proposals through resource consents or private plan changes. This reduces the efficiency of planning processes and increases costs associated with	provisions are introduced. Without a coordinated plan-led approach, development is more likely to occur in a reactive or ad hoc manner, which may reduce the effectiveness of environmental management over time. **Economic** A less prescriptive approach may reduce some upfront costs for applicants compared to a more structured framework such as the MDRZ. Applications under the existing intensification provisions may require fewer design-led assessments and supporting documentation. However, these cost differences are likely to vary depending on the complexity of the proposal and site constraints. Existing applications already often require technical input, such as stormwater engineering, and the absence of clearer standards may lead to greater uncertainty and variability in costs over time. **Social** For some members of the community, a lower level of intensification may be perceived as a benefit, particularly where there is concern about increased density or changes to neighbourhood character.	materially change development outcomes. The current rules also lack flexibility. Minor breaches can trigger a change in activity status, even where effects are not significant, which can discourage development. In contrast, a more structured framework such as the MDRZ allows for targeted assessment without escalation, supporting more consistent and proportionate decision-making. Relying on non-statutory methods, such as urban design guides, is also unlikely to be effective. These approaches can introduce subjectivity and inconsistency, and in practice may be applied selectively or not at all. Experience to date in Tasman indicates that such guidance has not consistently delivered the desired urban design outcomes. Without additional zoning or a clear regulatory framework, development capacity is unlikely to be provided in the scale or locations required. Reliance on private plan changes or individual resource consents results in ad hoc growth, which may not align with the FDS spatial strategy or broader infrastructure planning.	existing provisions to deliver outcomes. This creates uncertainty as to whether the intended outcomes, including increased housing capacity and improved urban form, will be achieved in practice. The reliance on objectives and policies without corresponding regulatory mechanisms also introduces risk that outcomes will be contested at the consenting stage, increasing uncertainty and variability in implementation. Risks of not acting The risks of not introducing a full suite of provisions are significant. Evidence demonstrates that there is an existing and projected shortfall in housing capacity, including a shortage of smaller and attached dwelling typologies. Introducing only high-level objectives and policies, without new zoning or rules, is unlikely to materially change development outcomes. As a result, the housing shortfall already projected over the next ten years would likely increase.

	infrastructure coordination and delivery. The existing Plan Change 66 provisions have been identified as relatively complex, which can increase the costs of preparing and processing resource consent applications. Continuing to rely on these provisions rather than introducing a clearer and more structured framework is likely to increase costs for applicants. A less prescriptive approach is also likely to result in greater debate at the consenting stage over how outcomes should be achieved. This increases transaction costs for all parties, including applicants, Council, and submitters. **Social** Relying primarily on existing zoned land and methods would not deliver sufficient housing capacity to meet demand, particularly for smaller and attached dwelling typologies. This would contribute to ongoing housing shortages and limit improvements in affordability. The lack of more enabling provisions for medium density development is likely to constrain housing choice, particularly for groups such as first home buyers, smaller households, and	The continuation of existing provisions may also benefit smaller-scale developers by retaining a more flexible framework. "Mum and Dad" developers, who currently make up a large proportion of applicants, may find the existing consenting approach more familiar and less prescriptive, particularly for small-scale infill development. However, these benefits are balanced against the likelihood that existing provisions will continue to deliver relatively low levels of intensification and a limited range of housing typologies. **Cultural** There may be some limited cultural benefits associated with a lower level of development, including reduced potential for effects on natural systems and associated cultural values. However, as with environmental effects, underlying development pressures remain. In the absence of a coordinated planning response, cultural outcomes would continue to be managed through individual proposals rather than through a comprehensive and proactive framework.	Overall, this option is unlikely to be effective in delivering sufficient housing capacity, particularly for medium density typologies, or in achieving coordinated and well-functioning urban environments. **Efficiency** A policy-led approach without new rules or zoning is less efficient in delivering housing capacity and urban development outcomes. The absence of tools such as Outline Spatial Plans reduces the ability to coordinate development in larger greenfield areas. This can result in less efficient land use, poorer urban design outcomes, and increased costs associated with retrofitting infrastructure and amenities. Reliance on private plan changes and site-by-site resource consent processes is also less efficient. This approach increases transaction costs, extends timeframes, and creates uncertainty for both developers and Council. It also limits the ability to plan for infrastructure in a coordinated and cost-effective manner. While it may be more efficient in the short term to delay introducing new provisions until a full plan review under future legislation, this does	This approach also risks Council not fulfilling its statutory obligations to provide sufficient development capacity and enable well-functioning urban environments. Reliance on existing provisions and non-statutory methods, such as urban design guidelines, is unlikely to achieve the required level of intensification. Previous experience indicates that such guidance is not consistently applied and does not provide a reliable substitute for clear, enforceable plan provisions. This increases the risk that intensification does not occur at the scale required, and that the design outcomes sought are not achieved. In the absence of more directive methods, development is more likely to occur in an ad hoc manner through resource consents or private plan changes. This reduces the ability to coordinate growth, align development with infrastructure planning, and achieve efficient urban form. Overall, the risks of not acting include worsening housing shortfalls, failure to deliver medium density development, and continued reliance

	older residents seeking more compact housing options. Evidence indicates that developers have rarely provided such typologies under existing rules, contributing to the current shortfall. The social impact assessment identifies a range of positive outcomes associated with the MDRZ, including increased housing supply, diversity, and benefits for local communities and businesses. Under this option, these benefits are unlikely to be realised, resulting in indirect social costs. **Cultural** Overall cultural effects are likely to be neutral, as separate provisions for papakāinga development remain.		not address immediate growth pressures. In a context of continued population growth, failure to act in the interim is likely to increase housing shortfalls and associated costs over time. Overall, this option results in a more reactive and fragmented approach to development, with higher long-term costs and reduced efficiency in both planning and infrastructure delivery.	on reactive and uncoordinated development processes.
Economic Growth and Employment of proposed objective (c)	**Economic growth and employment** Failing to proactively plan through a more comprehensive set of objectives, policies, and methods to provide sufficient housing land capacity is likely to constrain economic growth. In the absence of a clear and enabling framework, housing demand would remain unmet, with negative consequences for the residential market, the wider economy, and the community. This approach is also likely to result in applicants pursuing development through less efficient and more costly pathways, such as private plan changes. This increases transaction costs and reduces the overall efficiency of the planning system, with wider economic implications. There is a strong relationship between housing availability and employment outcomes. Option (c) would continue to exacerbate existing difficulties in attracting and retaining workers, as employees face ongoing challenges in securing suitable and affordable housing. Evidence from business feedback identifies housing, employment, and social conditions as key factors influencing business performance. Without adequately addressing housing supply constraints, these issues will persist, limiting labour market accessibility and constraining business growth and expansion.			

Overall evaluation of options	**Option (a): Introduce a Comprehensive Suite of New Provisions (Preferred Option)** Option (a) proposes an integrated package of new objectives, policies, zoning, and rules, including the MDRZ, Outline Spatial Plans (OSPs), and the Medium Density Residential Design Matrix. This option provides a clear, plan-led approach to delivering residential growth and housing diversity across Tasman's urban areas. The evidence base supporting this option is robust and up to date, drawing on the FDS, Housing and Business Assessment 2024, Richmond Spatial Plan, Māpua Masterplan, and extensive engagement with the community, iwi, and stakeholders. Technical evidence, including the MDRZ assessments and supporting economic analysis, demonstrates that the proposed methods are capable of delivering the intended outcomes. Option (a) performs strongly across all four wellbeing dimensions. It promotes efficient use of urban land, supports a more compact urban form, and reduces reliance on greenfield expansion. It enables a greater range of housing types and improves housing affordability over time by aligning supply more closely with demand. It also supports economic growth by increasing development certainty, reducing transaction costs, and strengthening the labour market through improved housing availability. Cultural outcomes are supported through integrated planning and engagement, alongside complementary provisions such as those for papakāinga. The regulatory framework is both effective and efficient. It provides clear, measurable expectations for development while retaining flexibility in how outcomes are achieved. Tools such as the Design Matrix and OSPs support consistent decision-making and coordinated development. Risks associated with this option are low and manageable, reflecting the strength of the evidence base, alignment with national direction, and the inclusion of mechanisms to manage infrastructure and environmental constraints. Overall, Option (a) provides a comprehensive and coordinated response that is capable of delivering sufficient housing capacity and well-functioning urban environments. **Option (b): Status Quo (Rely on Existing TRMP Provisions)** Option (b) retains the current TRMP framework, relying on existing objectives, policies, and rules to provide for residential development. The assessment finds that this option is not capable of delivering the required housing capacity or diversity. Existing provisions are general, lack clear direction, and have not delivered sufficient intensification to date. Development outcomes are uncertain and often dependent on case-by-case assessment, resulting in inconsistency and higher transaction costs. Under this option, growth pressures would remain but would be met through less efficient and more reactive mechanisms, including ad hoc resource consent applications and private plan changes. This would likely result in fragmented urban development, inefficient infrastructure provision, and continued reliance on greenfield expansion. The costs associated with this option are significant. Environmental outcomes are degraded over time through inefficient land use and increased pressure on rural land. Economic growth is constrained by housing shortages and labour market limitations. Social outcomes worsen due to reduced housing affordability and limited housing choice. Cultural outcomes are also adversely affected, as the existing framework does not adequately support diverse housing needs or aspirations.

While there may be minor short-term benefits, such as reduced upfront costs and retention of existing neighbourhood character, these are outweighed by long-term negative effects. This option is neither effective nor efficient and carries a high risk of perpetuating existing issues.

Option (c): Minimal Change (Objectives and Policies Only)
Option (c) introduces high-level objectives and policies but does not include new zoning or a supporting rules framework. It relies on existing methods to deliver intensification and housing supply.

This option provides some improvement over the status quo but remains insufficient to achieve the scale of change required. While it signals direction through policy, it lacks the regulatory tools needed to influence development outcomes in practice. Experience indicates that objectives and policies alone are unlikely to significantly alter development behaviour, particularly in relation to medium density housing.

Without new zoning and implementation tools, development is likely to continue at low levels and in an ad hoc manner. Opportunities for coordinated intensification and efficient use of land would not be fully realised. Reliance on non-statutory methods, such as design guides, introduces further uncertainty and does not provide enforceable outcomes.

This option may offer some limited benefits, including reduced upfront regulatory complexity and greater flexibility for smaller-scale developers. However, these are offset by increased uncertainty, higher transaction costs over time, and the continued under-delivery of housing capacity.

The option is only partially effective and less efficient than a comprehensive approach. It is unlikely to meet statutory requirements to provide sufficient development capacity and would result in ongoing housing shortages, constrained economic growth, and missed opportunities for improved urban outcomes.

Conclusion
The comparative assessment clearly identifies Option (a) as the most appropriate way to achieve the objectives.

Option (a) provides a comprehensive, evidence-based, and coordinated framework that enables sufficient housing capacity, supports well-functioning urban environments, and balances environmental, economic, social, and cultural outcomes. It delivers a high level of certainty and is capable of responding to both current and future growth pressures.

In contrast, Options (b) and (c) rely on existing or lightly amended frameworks that have already been demonstrated to be insufficient. Both options are unlikely to deliver the required housing capacity or urban outcomes, and both carry significant risks of continued inefficiency, housing shortages, and uncoordinated development.

Option (a) therefore represents the most effective and efficient approach, and is recommended as the preferred option.

Recommended option

After a comprehensive assessment of all options—considering costs, benefits, effectiveness, efficiency, and the risks of acting or not acting—it is clear that the preferred approach is to adopt the full suite of proposed residential provisions for the TRMP, as set out in Option (a). This option best gives effect to and implements the requirements of the NPS-UD, while having regard to TRPS C1, the FDS and MMP. The proposed plan change is grounded in robust evidence, extensive engagement, and a strong policy framework, ensuring that it will deliver efficient, effective, and sustainable outcomes for the district.

10.4 Evaluation of Suite of Commercial Provisions in achieving the Land for Commercial activities objectives

The TRMP already contains an objective on a suitable supply of industrial land over the long term (6.5.2.2) and as part of PC81, a proposed policy 6.5.3.1A on a supply of industrial land. No new objectives are therefore proposed as part of PC81 for industrial land.

In relation to commercial activities however there are two new proposed objectives (6.6.2.3 and 6.6.2.4) and some amendments to objectives related to commercial land 5.4.2, 6.6.2.2, and 6.7.2. These amendments are consequential in nature, arising from broader changes to the structure and terminology of the plan rather than representing substantive shifts in policy direction, updated primarily to ensure consistency with new and amended objectives, policies, and rules introduced elsewhere in PC81 e.g. the introduction of the MDRZ, updated urban design provisions, and the new commercial centre hierarchy. No new policy intent or regulatory approach is introduced through the amended commercial related objectives, rather, they support the effective implementation of the substantive provisions of the plan change.

The intent of the two new commercial objectives is explained in Table 15 below.

Table 15 Commercial Provisions Evaluation

Evaluation of Suite of Commercial Provisions in PC81, in achieving the Proposed Land for Commercial Activities objectives 6.6.2.3 and 6.6.2.4
PC81 proposes two new objectives on commercial land, one related to a supply of suitably located commercial land to provide for regional and district needs for the long term and another on an established hierarchy of existing commercial centres, based on the National Planning Standards 2019 Zone names. Amendments to existing policies are proposed as well as seven new policies. The new policies relate to the proposed centres hierarchy, infrastructure and investment efficiencies gained from the hierarchy, the role of Richmond metropolitan centre and of Motueka and Tākaka centres in the District, the roles of local and neighbourhood centres, enabling commercial activities near reserves/open space and enabling limited commercial activities in the MDRZ. Amendments to policies include those on Mixed Business activities (see section 6.6.3.13). In the Richmond section 6.8, four new policies are proposed for Richmond's commercial role and one new policy on enabling taller commercial buildings in Richmond, incorporating residential opportunities above ground floor. In the Motueka section 6.9 a new policy is similarly proposed on enabling mixed use developments in the commercial area. Amended rules are proposed in the Zone rules chapter 17.2 to enable permitted building heights in Richmond and Motueka's Commercial Zone to 13 metres. In the Tākaka section 6.11 a policy is amended to ensure that Tākaka's CBD Zone continues to develop as the main hub for commercial and service activities in Golden Bay and Collingwood and Pōhara serve the role of local centres. Amendments are also proposed to the Zone rules chapter 16.3.4 and 17.3 on the Mixed Business Zone and information requirements for consents (19.2) to: ○ permit bulky goods retail activities, typically car orientated, in the zone ○ permit other retail activities subject to a minimum gross floor area per individual tenancy and a maximum overall floor area per site ○ manage all other retail activities to varying degrees ○ avoid smaller retail activities in this zone, which are more appropriately accommodated in the centres ○ Remove the retail frontage area along Lower Queen Street Mixed Business zone area

Appendix 23 summarises the provisions in full and section 7 of this report provides an overarching summary.				
PROPOSED OPTION (a)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**	**Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions**
Introduce a suite of provisions in PC81 to give effect to the NPS-UD have regard to TRPS C1 and Council's FDS objectives. The overall structure of the TRMP is retained but issues, objectives, policies and methods are added or existing ones amended.	Environmental Providing additional business land in accordance with the RMA, NPS-UD and the FDS growth strategy requires balancing a range of sometimes competing objectives. Without careful management, this can give rise to environmental costs. The FDS seeks to deliver a growth strategy that achieves a range of objectives, including minimising impacts on the natural environment, providing for opportunities for restoration, and prioritising highly productive land (HPL) for primary production. Most of the sites proposed in PC81 are adopted FDS sites and have been assessed against these criteria. Any additional sites have been assessed against the same framework. Five sites are proposed for commercial or mixed business zoning through PC81: T-115 Berryfields (Richmond) T-122 Main Road (Hope) T-106 Ellis Street (Brightwater)	Environmental Environmental benefits will result from providing new commercial land either within or close to towns which are growing. These include: - a compact urban form, reducing general reliance on cars for travel and encouraging pedestrian/active travel oriented visits for retail activities, excluding bulky goods which are permitted in the Mixed Business Zone. -using less highly productive land for greenfield commercial development by containing sprawl, minimising impacts on the natural environment -closer proximity to amenities and services - Good accessibility for people between jobs and housing. Accessibility from all FDS sites to jobs, schools, daily services and other amenities, by all modes of transport, was assessed at the multi criteria analysis stage in some detail using a model prepared by MRCagney. Accessibility has been further assessed as part of PC81. Economic	**Effectiveness** The proposed policies on the centre hierarchy, based on the National Planning Standards 2019 Zone names, ensure the relevant commercial objective of PC81 and policy 5.1C of TRPS C1 are achieved. The TRMP does not contain objectives for its individual commercial centres in chapter 6, so Council's objectives for each main centre are unclear. To date Council has had at least two private plan changes for large commercial development on the outskirts of Richmond where the commissioners made clear that the lack of clarity in the TRMP over Council's objectives for its centres was unhelpful. Significant amounts of Mixed Business Zoned land remains around Richmond and further development of this for large format retail could be to the detriment of Tasman's centres. Proposed policy 6.6.3.3 therefore establishes the defined role and function of each centre and the appropriate place in the commercial zone hierarchy. This,	Council has undertaken retail audits of all of its town centres in 2020 and 2024 and this information has informed PC81. Analysis of each of the 13 centres in Tasman provides evidence for PC81 by – e.g. informing locations of zone changes for further commercial and Mixed Business development and evidence of demand in centres e.g. by retailers locating on land not zoned commercial on the edge of a centre such as Brightwater. The comprehensive survey data collected means Council is well informed about the health of each centre, the scale of each centre, number of retail units present, diversity of uses, demand by businesses and the role the centre is performing. This has directly informed the proposed centre hierarchy policy in PC81, fulfilling relevant objectives in the TRMP and TRPS C1. On demand for additional commercial land in Tasman, an economic assessment has been obtained which both informed

	T-150 (two town centre sites in Murchison) All of these are FDS-identified sites. Sites T-106 and T-150 do not contain highly productive land. T-122 comprises LUC3 land, which is classified as highly productive under the NPS-HPL, although the site is partly developed. Clause 3.6(6) of the NPS-HPL does not restrict rezoning of LUC3 land. T-115 contains LUC1 land but is already zoned deferred Mixed Business in the operative TRMP and is therefore exempt from the NPS-HPL under clause 3.5. Policy 3.6 of the NPS-HPL allows rezoning of HPL for urban use where certain criteria are met, including: the land is required to provide sufficient development capacity to meet demand under the NPS-UD; there are no other reasonably practicable options to meet demand while achieving a well-functioning urban environment; and the benefits of rezoning outweigh the loss of HPL. Sites containing HPL are considered to meet these tests, particularly T-122. This is consistent with recent case law confirming that the NPS-HPL does not prohibit rezoning	Providing sufficient capacity of commercial, retail and mixed business land to meet demand will help ensure the continued economic growth of the regional economy, including Nelson. Growth benefits the economy and in particular industries supported by the construction market, with a knock-on effect on productivity. There will be economic benefits for businesses looking to locate or relocate within the region by providing more opportunities. Landowners also benefit from the uplift in land value, by zoning it for urban development rather than rural land. The proposed policies on establishing a hierarchy for existing commercial centres in Tasman, including proposed policies for commercial activities in Richmond not only meet the relevant objective in PC81 but also policy 5.1C of the TRPS C1. Such a hierarchy ensures Richmond will continue as the primary urban centre in Tasman and together with Motueka and Tākaka, be the central focus for pedestrian oriented commercial development. By establishing the defined role and function of each centre, economic efficiencies will be realised by focussing maintenance, upgrades, regeneration and infrastructure enhancements in those centres, relative to their defined role. Such a	together with the proposed changes to the Mixed Business policies and rules is an effective way of indicating Council's preferred location for different types of commercial developments that generate many trips, as well as Council's objectives for each centre and is an effective way of achieving objective 6.6.2.4 of PC81 and the policy 5.1C in TRPS C1. By proposing additional sites to be zoned or changing existing rules for commercial/mixed use development, this is an effective way of ensuring that sufficient commercial land capacity is provided to meet expected commercial demand in Tasman. It will also support the role and function of those centres proposed for growth. The proposed changes to the Mixed Business policies and rules ensure that bulky goods retail activities remain permitted, but other retail activities are restricted in their gross floor area and/or type. This is to minimise flow on effects from significant large format retail development out of centre, on Tasman's centres, particularly Richmond. PC81 also proposes applicants provide a retail impact assessment of Mixed Business Zone development on Tasman's centres, including cumulative effect.	Council's latest HBA 2024, the FDS, TRPS C1 and PC81. Feedback from consultation on Council's FDS also provided further anecdotal evidence of demand for more commercial/mixed business floorspace. Given the uncertainty with business land demand forecasting for the HBA, past building consent trends for commercial land from 2018-2024 were reviewed. This has been used in sensitivity analysis for land demand forecasting and has informed the sites proposed for rezoning Commercial/Mixed Business in PC81. More recently further economic advice has been obtained into the potential for flow-on effects of large format retail around Richmond town centre in the Mixed Business Zone. This examined various scenarios and has shown that if changes were not introduced to the operative policies and rules for the Mixed Business Zone and if large amounts of the Mixed Business Zone is developed for retail, the flow on effects could be significantly adverse to Tasman's town centres, especially Richmond. It therefore became clear that action was required and changes were needed as part of PC81 to the Mixed Business Zone policies and rules.

	of highly productive land where a well-functioning urban environment can be demonstrated. The necessary multidisciplinary analysis, including consideration of urban characteristics and market dynamics, has been undertaken through the FDS, HBA and supporting work informing this plan change. Commercial development can increase stormwater runoff through additional impermeable surfaces. All sites have been assessed for infrastructure requirements through the background site assessment. Sites T-106 and T-150 are already developed. T-115 has existing stormwater reticulation and runoff will be directed to the Poutama drain. T-122 is not currently serviced for stormwater, but Council is progressing upgrades (Borck Creek), and on-site mitigation will be required in the interim. Environmental effects may also arise from increased traffic associated with commercial development. However, all proposed sites are located within existing town centres or on the edge of centres (notably T-115 and T-122), which helps minimise vehicle kilometres travelled. Proposed changes to Mixed Business Zone provisions enable bulky goods retail activities that are typically car-oriented, while	hierarchy helps achieve well-functioning urban environments, general objective 2A, proposed in TRPS C1. The proposed changes to the Mixed Business Zone policies and rules would ensure that flow on effects from significant amounts of large format retail in Tasman's Mixed Business Zone are minimised and Richmond's town centre would not be threatened. This method provides economic benefits for Tasman's town centres, particularly Richmond but also Motueka and Māpua. There will be economic benefits for the community by making Tasman's town centres the preferred location for many retail activities that attract many trips, as well as for the businesses themselves. More of the community will be able to access such businesses more easily than if they were located out of town, since Tasman's larger centres are served by the e-bus. One trip to a town centre can serve several purposes and new businesses in the centres can help the economic strength of the existing centres. In Tasman's smaller local centres, the village shops play a vital economic role in rural areas and those centres should be the preferred location for new retail development. The proposed changes to the Mixed Business policies and rules	**Efficiency** While urban development can have adverse effects on the natural environment and lead to inefficient use of land, the strategic planning for commercial capacity that has already taken place in Tasman through the FDS will ensure that such impacts are minimised. Further environmental impact evaluations have also been made of the sites during preparation of PC81 (provided in the Background Assessment Report). Together TRPS C1 and PC81 will meet legal obligations to provide capacity for the right type of business demand. PC81 and TRPS C1 are giving effect to the NPS-UD but also having regard to the FDS. This effectively ensures that risks to the natural environment from urban development in inappropriate locations are minimised. Tasman's urban environment, particularly Richmond has grown significantly in the past 6 years. While the TRMP and TRPS are outdated, current RMA reform prevents councils from progressing whole of plan reviews. In the meantime, TRPS C1 and PC81 are required in order to meet the objectives of the NPS-UD. It will have environmental, economic, social and cultural benefits.	Therefore, sufficient commercial information is available to minimise risk of acting and although some earlier demand forecasting is uncertain for the HBA, alternative forecasts have been used as well as more recent economic advice for retail having been obtained. Tasman was the fastest growing region between 2018 and 2023 with its population increasing by 5,429 people or 10.3%. Tasman's population is projected to continue to increase by around 1% per annum. Additional commercial sites need to be provided, in addition to the existing zoned Commercial/Mixed Business land, to provide business land to provide for the population growth. The rapid population growth means additional expenditure is available in Tasman for retail businesses. Recent increased interest by retailers in the region is evident. The proposed centre hierarchy and changes to the Mixed Business policies and rules ensure Richmond continues as the primary urban centre in Tasman and together with Motueka and Tākaka, they are the central focus for pedestrian oriented commercial development.

	directing smaller format retail activities to established centres, supporting more efficient travel patterns and centre-based activity. Economic Option (a) involves greater upfront cost than the status quo, as it requires a plan change. However, it gives effect to the NPS-UD and has regard to TRPS C1 and the FDS, and therefore provides a more robust and enduring planning response. Significant costs are associated with providing infrastructure to service newly zoned commercial land. These costs will be borne by both Council and developers and are largely anticipated in the Long Term Plan. Infrastructure investment is often required in advance of development, with costs recovered over time through development contributions. Where servicing is not immediately available, sites are deferred in PC81 until infrastructure capacity is provided. These sites therefore contribute to plan-enabled capacity but may not be infrastructure-ready in the short term. Proposed transport provisions may impose additional costs on some businesses, including requirements for cycle parking and end-of-trip facilities to support active modes. Changes to Mixed Business Zone policies and rules may also impose	acknowledge that some retail activities e.g. bulky goods and set floorspace thresholds of retail floorspace, remain permitted in the Mixed Business Zone. This provides a balanced approach recognising that some retail activities are not suitable or appropriate for centres and still provides economic benefits for developers. There are economic benefits in the form of agglomeration benefits from businesses co-locating in Tasman's centres. A strong town centre can also lead to e.g. markets setting up in the centre, capitalising on the existing footfall in a centre, thereby increasing retail choice for residents. Social The proposed policies on the hierarchy of existing commercial centres to provide a focus for retail, commercial, community and entertainment activities will provide social benefits for the community. These are linked to economic benefits but there are clear social benefits for the community, of PC81 provisions directing much new commercial development to each centre, especially local centres in rural areas. The proposed changes to the Mixed Business Zone policies and rules further protect Tasman's town centres from significant adverse flow on effects, posed by excessive large	The proposed policies in PC81 on the centre hierarchy will ensure infrastructure and investment efficiencies both for Council and for businesses, with certainty provided on the role and function of each centre.	

	costs by limiting the scale and type of retail activity permitted, reducing flexibility for some operators. However, these controls are necessary to manage adverse effects on established centres. There is a substantial area of Mixed Business zoning (over 38 hectares in the Richmond area), and unrestricted development of large format retail in these locations could undermine the role and function of key centres such as the Richmond CBD. Expert evidence indicates that such outcomes could result in long-term and potentially irreversible economic impacts on centre vitality. Social Commercial development in or adjacent to residential areas can give rise to reverse sensitivity effects. All sites have been assessed against this risk as part of the FDS multi-criteria assessment. With the exception of T-115 and T-122, all proposed commercial sites are within established commercial areas. For T-115 and T-122, buffers between future residential and commercial areas will be required to manage reverse sensitivity effects. The NPS-UD recognises that amenity values in urban environments will change over time and that such change is not inherently an adverse effect. Proposed changes to TRPS C1	format retail establishing out of centre. In Brightwater, evidence was gathered during Council's 2020 town centre audit, that more commercial land was needed for the community as commercial uses are locating on land zoned for other purposes. Rezoning land for commercial purposes in such areas as part of PC81 will have social benefits. The social impact assessment prepared for PC81 concluded that positive effects exist from the MDRZ rules on businesses and employment and consequent social effects. It found that business owners strongly supported population growth more so via intensification than greenfield development. This would liven town centres after shops shut, as well as boosting business prospects. The proposed changes to the Commercial Zone rules for Richmond and Motueka to allow 3 storeys will enable mixed use development and an FDS site in Hickmott Place, potentially with commercial at ground floor and residential above. Such mixed use development would provide social benefits, arising from a more compact urban form and blend of complimentary land uses, providing for		

	similarly acknowledge that amenity values in areas undergoing intensification will evolve. The provisions in PC81 reflect this by enabling change while managing effects through design, zoning, and interface controls. Cultural Engagement with ngā iwi has identified that urban growth can raise concerns, particularly in relation to impacts on the natural environment and sites of cultural significance. Site selection and plan provisions have been informed by this engagement. All sites have been assessed through the FDS multi-criteria process, which includes consideration of impacts on the life-supporting capacity of natural resources and ecosystems. Checks have also been undertaken to identify any potential impacts on sites of cultural significance to Māori, and no adverse effects have been identified. Overall, cultural costs associated with Option (a) are expected to be limited, with risks identified and managed through site selection, plan provisions, and ongoing engagement.	more social interaction in Tasman's larger centres. Cultural The proposed policies on the hierarchy of existing commercial centres to provide a focus for retail, commercial, community and entertainment activities will provide cultural benefits for the community in the form of social cohesion. A trip to the local centre can be multi-purpose, combining retail needs with using services or community facilities. Tasman's commercial centres have cultural benefits and their role and function should be protected for their widespread communities. Proposed changes to the Mixed Business policies and rules will assist with this retained focus on Tasman's centres, providing cultural benefits. Proposed changes to the Commercial Zone building heights to enable mixed use development in Richmond and Motueka will also enable cultural benefits, by planning for closer integration of commercial and residential uses, improving accessibility to jobs. Such benefits were also identified in the social impact assessment.		

Economic Growth and Employment of option (a)	**Economic Growth** The inclusion of additional land for Commercial/Mixed Business Zone in PC81 will ensure the continued economic growth of the region. Tasman is also providing for Nelson's business land capacity in the medium to long term, as the HBA 2024 demonstrates. The proposed centre hierarchy seeks to ensure that Richmond will continue as Tasman's Metropolitan Centre, its primary urban centre and assist the economic growth of the region in doing so. The proposed changes to the Mixed Business policies and rules provide a balanced approach for the local economy, recognising that some retail activities are not suitable or appropriate for town centres, but requiring assessments for retail activities in this zone to determine the level of impact on Tasman's centres, since the cumulative impact on centres could be significant. The provisions of PC81 will provide for economic gains of both Tasman's and Nelson's residents with increased employment and businesses with increased revenue derived from a growing customer base.		**Employment** PC81 provisions will contribute to increased employment, both through construction of commercial buildings and actual employees working at the businesses. Tasman is a growing region. The Nelson and Tasman urban environment is closely integrated. Commuting flows define the region as a single labour market that jointly determines growth for each local council. Nelson and Tasman function as a single housing and employment market.	
PROPOSED OPTION (b)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**	**Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions**
Do not update the TRMP with a new package of commercial provisions instead relying on its existing provisions giving effect to the NPS-UD (status quo).	**Environmental** Existing policies in the TRMP on commercial activities (eg. 6.6.3.1) do not identify the urban and rural centres as locations for commercial land, but refer to 'defined areas in settlements'. This opens up the potential locations for new commercial businesses and could continue a sprawling urban form for commercial development in Tasman, using more highly productive land and increased reliance on cars for travel. Such spot zoned locations may not necessarily be in close proximity to	**Environmental** Possible benefits exist for the environment from not planning for further commercial development, but Council has a statutory obligation to provide sufficient commercial and retail land capacity and to provide well-functioning urban environments. Council therefore needs to find a way of doing this while ensuring that important environmental and cultural values are protected. PC81 proposes such methods. **Economic**	**Effectiveness** Operative policies in the existing chapter 'land for commercial activities' in the TRMP do not provide clear aims for Tasman's commercial centres. Neither does this section of the TRMP provide methods on how Tasman's commercial centres would be maintained and enhanced, such that the social, cultural, economic and environmental wellbeing of the community is met. Existing policy 6.6.3.1 is not centre based, it refers to 'defined areas' in the settlements. This is an ad hoc approach, tested	Greater risk would result with option (b) than (a). By not acting, i.e. not updating the TRMP with a package of new provisions for commercial and Mixed Business land, it would eventually result in shortages of such land capacity for the entire region. Further the existing Mixed Business Zone provisions pose a risk of significant adverse flow-on effects for Tasman's centres, particularly Richmond, if significant amounts of land was developed for large format retail. This is a significant risk from

	other amenities and services, which allow potential for linked trips for more than one purpose. This in turn would lead to more vehicle kilometres travelled if they are in locations not served by the e-bus, or easily accessible by active transport. Spot zoning commercial locations arising from private plan changes also does not necessarily provide good accessibility for people between jobs and housing, nor does it necessarily favour locations in proximity to existing employment areas. Tasman has several examples in recent years where business, such as contracting companies have established in inappropriate rural locations because of the absence of sufficient zoned land. This can be in contravention of planning rules, but business land requirements are unavoidable when the need arises. **Economic** Existing policies on commercial activities in chapter 6.6 of the TRMP seek Richmond to continue to develop as the central focus for intensive retail and office commercial development but do not define either the broader role of Richmond centre or reference other major towns like Motueka and Tākaka and the significant role those centres play.	This option will be directly less costly than option (a) as it would not require a plan change. However in doing so the TRMP would remain out of date and would not implement the NPS-UD, the TRPS C1 or align with the FDS. There may be economic benefits to existing businesses including retailers in Tasman, by not planning for further commercial or mixed business development and zoning more land, enabling those businesses to retain their current market share. However s.74 of the RMA makes clear that *"in changing any district plan, a territorial authority must not have regard to trade competition of the effects of trade competition."* **Social** Some members of the community do not wish for Tasman to grow any further and so failing to plan for additional commercial development in the TRMP may be seen as a benefit by this part of the community. However by failing to provide additional business opportunities and employment opportunities for a fast growing population, Council would not be meeting the social, cultural, and economic wellbeing of the community at large. **Cultural**	recently with spot zoning via private plan changes, with no clear policy aims. The existing regulatory context is not an effective way of clarifying the role Council wants for Tasman's centres to play or in planning for well-functioning urban environments. This has been highlighted at recent private plan change hearings for out of centre commercial development. **Efficiency** By not adding new Commercial Zone and Mixed Business Zone sites to the TRMP, this would eventually result in insufficient capacity being provided to meet expected demand which is not an efficient approach. This could have consequences for Tasman but also Nelson, since Tasman provides for Nelson's business capacity in the medium to long term. Existing Mixed Business Zone rules can inadvertently allow for a very significant amount of large format retail floorspace around Richmond. While some is manageable without resulting in significant adverse flow on effects for Tasman's centres, significant amounts of large format retail development would have significant adverse effects on Tasman's centres, which is not an efficient regulatory approach.	not amending the Mixed Business Zone policies and rules. Council has obtained expert economic advice on the implications of this, and already has a 2024 HBA and retail audits of all Tasman town centres in 2020 and 2024. The issue of insufficient information does not therefore arise.

	The principal reasons and explanation to chapter 6.6 also do not clarify that significant commercial development outside centres is not envisaged or supported. This has led to edge of centre food retail development establishing in Richmond via private plan changes because the Council's objectives for the centre were not clear enough. This sprawling approach does not maximise economic efficiencies in Tasman's centres in terms of maintenance, upgrades, and infrastructure investments and leads to additional costs. If changes are not proposed to the Mixed Business Zone policies and rules, significant adverse flow on effects for Richmond in particular could arise from development of large amounts of large format retail around SH60 and SH6. Such a scenario would reduce the patronage and turnover of existing shops in Richmond so acutely that the community's economic wellbeing is undermined. By not providing additional sites zoned Commercial in the TRMP, insufficient land capacity will be provided for the next ten years in these towns and the economic growth of the region (including	No cultural benefits for this option have been identified, since potential impacts on the natural environment and adverse effects on places of cultural heritage significance would remain with private plan changes and resource consent applications for commercial development.		

	Nelson) will not be assisted. The HBA shows that in the medium term and long term Richmond is providing commercial land capacity for Nelson city as well as Tasman. This lack of identified capacity would have knock on costs for businesses looking to move to the region or relocate within the region. **Social** By relying on existing commercial activity policies in the TRMP, such development could continue to occur in an ad hoc way, with social costs for the community, incurring longer, one purpose trips and more likely by car than other modes. There would be increased accessibility costs for the community. By not protecting the role and function of Tasman's centres, particularly the smaller local centres, with new PC81 provisions, the vital role these centres play for the community may not be safeguarded, in terms of providing for social cohesion. By not providing for further commercial land, where a population is growing, this is not maximising employment opportunities for residents, or location opportunities			

	for new businesses, providing for social wellbeing. If changes are not proposed to the Mixed Business Zone policies and rules, significant adverse flow on effects could arise from development of large amounts of large format retail in these locations. Such a scenario would reduce the patronage and turnover of existing shops and services in Richmond, so acutely that the community's social wellbeing could be undermined. This could arise where the function of such centres is undermined by competing out of centre commercial development and the centre no longer provides services and functions that contribute to the community's social wellbeing. **Cultural** Similar to the social costs outlined above, failing to maintain and strengthen the role of Tasman's centres could result in cultural costs to the community. By failing to direct significant commercial development to centres and providing the opportunity for multi-purpose trips to a centre, the role and function of that centre could decline such that its cultural value is lost to the community it serves			

Economic Growth and Employment of option (b)	**Economic Growth** Expert economic advice demonstrates that available demand exists for additional retail and commercial floorspace in Tasman due to recent and projected population growth. If option (b) was pursued with no new commercial and Mixed Business sites, this demand would be unmet. This would hinder economic growth of both Tasman and Nelson, since Tasman is providing for Nelson's commercial land capacity in the medium to long term. Existing undeveloped Mixed Business Zoned land exists around Richmond. Without changing the policies and rules for this zone, significant amounts of large format retail could develop around Richmond. While this would provide economic growth it could be to the detriment of Tasman's centres, depending on the amount of floorspace provided, not least Richmond, Māpua and Motueka. Such significant out of centre development would be at the expense of the continued economic growth Tasman's centres. This could also undermine the community's economic wellbeing. In such a scenario, Richmond's CBD may take decades to return to current retail revenue levels, if at all.		**Employment** Existing undeveloped zoned Mixed Business and Commercial land could provide a level of additional employment, once developed, both through construction and employees of new businesses. However, option (b) would fail to provide as many businesses with new opportunities to locate in the region as option (a), which provides more zoned land capacity. This in turn means levels of additional employment through construction and operation of new businesses would be less with option (b) than option (a).	
PROPOSED OPTION (c)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**	**Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions**
Amend the TRMP but with fewer provisions introduced and less prescription, with an overarching objective [6] and policies 6.6.3.1 and	**Environmental** Environmental costs of only one objective and overarching policies on commercial land being introduced, which seek to increase capacity would come with environmental costs similar to the status quo option (b) above. This is because by amending	**Environmental** None identified as in the absence of further zoned commercial land, pressures for commercial growth would still occur but by private plan change or resource consent in a more uncontrolled, ad hoc fashion.	**Effectiveness** To introduce amendments to policies 6.6.3.1 and 6.6.3.2 only to implement proposed objective 6.6.2.3, would satisfy some of the NPS-UD requirements but not all and it would not easily enable Council to carry out its statutory functions in relation to	Council has a good evidence base on which to base its proposed commercial centre hierarchy – retail audits 2020 and 2024 and recent expert economic advice on retail effects of large format retail.

[6] Proposed objective 6.6.2.3 "A supply of suitably located commercial land to provide for the medium to long-term needs of the Tasman and Nelson region."

6.6.3.2 only, relying on existing methods for commercial activities, (omitting both further zoned land, the proposed commercial centre hierarchy policies and changes to the Mixed Business Zone rules.)	policies 6.6.3.1 and 6.6.3.2 only but not zoning more commercial and Mixed Business land, not proposing the commercial centre hierarchy and not changing the Mixed Business Zone rules, it remains unclear where new commercial land should be directed, or how commercial activities should be compact. Such spot zoned locations or resource consents ('defined areas in urban and rural centres' in proposed amended policy 6.6.3.2) may not be in close proximity to other amenities and services, allowing potential for linked trips for more than one purpose. This in turn would lead to more vehicle kilometres travelled if they are in locations not served by the e-bus, or easily accessible by active transport. It could also lead to more sprawl, with associated economic costs compared with a more compact urban form. By not amending the Mixed Business Zone rules, this could lead to significant sprawling large format retail development around Richmond, generating significant numbers of vehicle trips but also consuming greenfield land, for purposes that can often be accommodated in Tasman's town centres. **Economic**	**Economic** Economic benefits for developers would exist with this option. The development of the Mixed Business Zone would remain highly flexible, with more options and less regulation. Economic benefits from more uncontrolled development would exist, but the issue is that these could potentially come at an economic cost to Tasman's town centres. **Social** Some members of the community do not wish for Tasman to grow any further and so failing to plan for additional commercial and Mixed Business development in the TRMP may be seen as a benefit by this part of the community. However, by failing to provide additional business opportunities and employment opportunities for a growing population, Council would not be meeting the social, cultural, and economic wellbeing needs of the community at large. **Cultural** No cultural benefits for this option have been identified, since potential impacts on the natural environment and adverse effects on places of cultural heritage significance would	growth. Proposing the objective and high level policies only seeking sufficient capacity, would not provide the methods. It would not be clear how the additional commercial land capacity would be provided or how some commercial activities would be focussed and retained in Tasman's centres. It would also not accord with NPS-UD policy 1 and its implementation clauses – providing development capacity that is 'suitable' which at a minimum means in terms of location and size. The later chapters on each town in the TRMP (6.8-6.22) do not contain objectives for each centre. The TRMP is silent on the role and function of each centre. This option would not be an effective way of securing future commercial development in the right location, or of Council implementing objectives and policies to ensure that there is sufficient capacity of commercial land in the right locations and of the right type. By not zoning more land for commercial development under this option, but instead relying on e.g. Council's 2024 HBA which indicates further zoned capacity is required, its provision is unlikely to be effective. Relying on private plan change	Council also has evidence on which to base its commercial land demand – economic advice for the 2024 HBA and past building consent trends. Not acting, when Council has this data and information therefore poses a greater risk than proposing PC81 and its full set of commercial and Mixed Business Zone provisions.

	Economic costs by not changing the Mixed Business Zone rules could arise for Tasman's town centres, particularly Richmond. Significant amounts of large format retail development in the existing Mixed Business Zoned land around Richmond could disrupt the role and function of Richmond's CBD by draining its retail trade and diverting footfall elsewhere. This would come at an economic cost to Richmond and other affected town centres. The community's economic wellbeing could also be undermined. This option also does not maximise economic efficiencies in Tasman's centres in terms of maintenance, upgrades, and infrastructure investments and leads to additional costs, since the proposed commercial centre hierarchy in policy 6.6.3.3 would be absent. By not actually providing additional zoned land for commercial/Mixed Business use in Tasman, but relying on existing capacity and amending policies 6.6.3.1 and 6.6.3.2 only, this would come at an economic cost for the whole region, (Nelson included). Known demand exists, but insufficient capacity would likely be provided for the next ten years in these towns. This would have economic knock-on	remain with private plan changes and resource consent applications for commercial development.	proposals or resource consent applications to provide capacity has already resulted in ad hoc commercial growth, with spot zones and in future may not align with the FDS to locate in sustainable, serviced areas. Council will also likely be ineffective in providing sufficient capacity to meet demand. Practice to date, relying on the HBA, has shown that commercial development proposals by private plan change are intermittent and operator led. Regulatory plan-led change will provide clearer indications to the market where Council wishes to direct new commercial development. **Efficiency** Option (c) would be inefficient. It would amend the TRMP in a way that partly gives effect to the NPS-UD but does not have regard to TRPS C1 or the FDS. A plan change would still be undertaken with the associated expense but it would not go far enough, in providing clarity to the community and developers on both Council's objectives for its commercial centres and Council's preferred locations for new commercial development. It would also be inefficient because lacking the proposed commercial centre hierarchy, it would not enable	

	costs for businesses looking to move to the region requiring them to pursue private plan changes or resource consents or deterring them from relocating within the region. Economic costs would also fall to potential employees looking for fewer jobs. **Social** If changes are not proposed to the Mixed Business Zone rules, significant adverse flow on effects could arise from development of large amounts of large format retail on existing Mixed Business zoned land. Such a scenario could reduce the patronage and turnover of existing shops in Richmond and other Tasman centres and subsequently undermine their function so acutely, that the community's social wellbeing is undermined. An indirect social cost of not introducing the commercial centre hierarchy and changes to Mixed Business Zone rules is that the positive social effects that would arise from strengthening town centres and restricting out of centre retail floorspace would not be gained. The social impact assessment found that business owners strongly support population growth more so via		the efficient maintenance, upgrades and extension of network infrastructure for Tasman's towns.	

	intensification than greenfield development. This would liven town centres after shops shut, as well as boosting business prospects. **Cultural** Similar to the social costs outlined above, failing to strengthen the role of Tasman's centres could result in cultural costs to the community. By failing to direct commercial development to centres and providing the opportunity for multi-purpose trips to a centre, the role and function of that centre could decline such that its cultural value is lost. The proposed commercial centre hierarchy would be absent and cultural benefits in the form of social cohesion would not be gained, another indirect cost of this option. The role and function of Tasman's centres, including local centres in rural areas would not be protected for their widespread communities. Cultural costs may also exist with this option from potential adverse impacts on the natural environment and places of cultural heritage significance with ad hoc private plan changes and resource consent applications for commercial development. These costs could be higher than with strategically planned			

	commercial land capacity which has already rigorously explored such adverse effects.			
Economic Growth and Employment of proposed option (c)	**Economic Growth** This approach is unlikely to maximise the economic growth of the region as its laissez faire approach would not be planning for growth in a strategic way, rather relying on developer/operator proposals put forward. It would not provide developers with as much certainty as option (a) which is important for financial institution lending. It would also create greater consenting costs for developers (and potentially Council) due to lack of regulatory direction to guide commercial/Mixed Business proposals.		**Employment** Existing zoned Mixed Business and Commercial land that is undeveloped would provide a level of additional employment, if developed, both through construction and employees of new businesses. However option (c) would fail to provide as many businesses with new opportunities to locate in the region as option (a) which provides more zoned land capacity, and hence fewer jobs in construction and operations.	
Overall Evaluation	Overall, Option (a) — the introduction of a suite of commercial provisions through PC81 to give effect to the NPS-UD and have regard to the FDS and TRPS C1 — is the most appropriate, effective and efficient approach to achieve the relevant objectives. Option (a) balances competing objectives by providing sufficient zoned Commercial and Mixed Business land to meet demand over the short to medium term, while managing potential adverse effects on the natural environment. It enables additional capacity in appropriate locations, supported by provisions that maintain the integrity and function of Tasman's commercial centres. In particular, controls on the scale and location of large format retail ensure that out-of-centre development does not undermine established centres. Environmental benefits arise from supporting a more compact urban form, locating commercial development within or adjoining existing centres, and improving proximity to services and amenities. These benefits help reduce reliance on private vehicle travel and support more efficient land use. While additional zoning can result in environmental costs, these are appropriately managed through site selection and supporting provisions, and are outweighed by the benefits of a more coordinated and efficient urban structure. Potential adverse environmental effects associated with the identified commercial sites have been assessed and can be avoided, remedied, or mitigated. The sites are therefore suitable for development, and the provisions provide for sufficient land supply while maintaining appropriate environmental safeguards. Option (a) also provides for sufficient commercial, retail, and mixed business capacity to meet projected demand in Tasman and Nelson, as identified in the Housing and Business Capacity Assessment. This supports economic growth by enabling business expansion, attracting investment, and supporting employment opportunities. Economic benefits extend to both the development sector and the wider community, including increased business opportunities, improved productivity, and enhanced centre vitality. The proposed commercial centre hierarchy supports these outcomes by directing development to appropriate locations and enabling efficient infrastructure investment and centre regeneration over time.			

	Social benefits arise from strengthening the role and function of existing centres as focal points for commercial, community, and social activity. Concentrating development within centres supports accessibility, social interaction, and the vitality of local communities. Evidence from the social impact assessment also indicates strong support for population growth and intensification, particularly in relation to enhancing the vibrancy and economic performance of centres. A robust evidence base underpins the proposed provisions, including the FDS, HBA, commercial assessments, and town centre audits. This provides a high degree of confidence that the potential effects of commercial development, including the impacts of large format retail, have been appropriately understood and addressed. On this basis, the risks associated with implementing PC81 are low.

Recommended option

The options analysis in this section above has concluded that after assessing all options relative to costs, benefits, effectiveness and efficiency, risk of acting or not acting, the preferred option is the suite of proposed commercial related provisions for the TRMP based on option (a). This approach implements the requirements of the NPS-UD, and has regard to TRPS C1 and Council's FDS.

10.5 Evaluation of Suite of Papakāinga Provisions in achieving the Papakāinga development objectives

Table 16 Papakainga Provisions Evaluation

Evaluation of Suite of Papakāinga Provisions in PC81, in achieving the Papakāinga development objectives 10A.2.1 & 10A.2.2

The papakāinga development provisions in PC81 are in three separate parts of the plan change, which reflect the two different pathways for undertaking papakāinga development, being development within the Papakāinga Zone, or papakāinga development on land in another zone.
• New chapter 10A Papakāinga Development – provides a full set of objectives and policies specific to papakāinga development. The chapter includes new issues, objectives, policies, methods of implementation, principal reasons and performance monitoring indicators.
• New Chapter 16 General Rules section 16.14 Papakāinga Development – applies one set of rules for papakāinga development on land in zones other than the Papakāinga Zone. This section includes a new permitted activity for papakāinga development of up to 10 residential units provided the landowners can demonstrate their whakapapa to the listed iwi/hapu, minimum permitted standards are met and the land is in the Residential, Medium Density Residential, Rural 1, Rural 2, Rural 3 & Rural Residential Zones. There is a restricted discretionary pathway for developments that cannot meet these standards. In all other zones the activity status is discretionary.
• Changes are proposed to the operative chapter 17:
  ○ 17.13 Papakāinga Zone – Amendments are proposed to the permitted activity standards to align with the standards in the proposed section 16.14, except for the requirement for the landowners to demonstrate their connection to the land, and without applying a limit on the number of residential units to be included in the development. The amendments change the operative discretionary activity framework for resource consents to a restricted discretionary framework.
  ○ Operative chapters 17.1,17.5, 17.6,17.7 & 17.8 are proposed to be amended to delete the operative controlled and restricted discretionary rules for papakāinga development in these zones, replacing these rules with the proposed chapter 16.14 general rules to reduce rule duplication.
• Changes are also proposed to the zone and area maps as discussed in section 10.2 and 10.3 of this report.

A few days before documentation on PC81 was due to be finalised, the NES-P was gazetted by the government. While at the time of writing it has not yet come into force, it will do in about three weeks' time. Because the NES-P provides A nationally consistent set of rules, there is an option there roles could be deleted out of the TRMP. However the NES does not mandate that and moreover it states that a district plan can be more enabling, but not less enabling, than the NES. Appendix 23 summarises the provisions in full and section 7 of this report provides an overarching summary.				
Proposed option (a)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**	**Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions**
Introduce a suite of papakāinga provisions in PC81 to give effect to the NPS-UD and have regard to TRPS C1, and Council's FDS objectives to provide for papakāinga development. The overall structure of the TRMP is retained but issues, objectives, policies and methods are added or existing ones amended. New Papakāinga Zoned land is included.	**Environmental** Providing for papakāinga development under the RMA and NPS-UD requires balancing a range of objectives. Without careful management, enabling additional development can give rise to environmental costs. The FDS seeks to deliver a growth strategy that achieves a range of outcomes, including providing diverse housing choices (including papakāinga), minimising impacts on the natural environment, enabling opportunities for restoration, and protecting highly productive land (HPL) for primary production. The majority of sites relevant to PC81 have been assessed against these criteria, with new or amended sites assessed using the same approach. The papakāinga provisions manage stormwater in a manner consistent with the operative TRMP. These controls are expected to mitigate potential environmental effects arising from	Environmental benefits arise from enabling papakāinga development across a range of locations, including within existing urban areas and on rural ancestral land. In urban and peri-urban areas, benefits may include: • more efficient use of land through increased housing density; • improved access to existing services and amenities; and • support for more compact development patterns in locations where infrastructure and services are already available. In rural areas, environmental benefits are more localised and relate to the form and nature of papakāinga development. These include:	**Effectiveness** The proposed objectives provide for a wide range of housing types, including papakāinga development. The provisions in PC81 represent a comprehensive approach to updating the TRMP to address key resource management issues, including recognising and providing for the relationship of tāngata whenua and their culture and traditions with their ancestral lands, and supporting tāngata whenua to exercise rangatiratanga. The papakāinga provisions have been designed to be practical and straightforward to implement. This includes aligning permitted activity standards across zones where appropriate, and using clear tables to distinguish between rural and residential papakāinga, where differences are required to address cross-boundary effects such as those arising from rural activities. This approach improves usability and consistency across the plan. The provisions have also been developed with regard to the draft National	**The risk of acting**—by introducing updated and enabling papakāinga provisions—is low. The proposed changes are based on extensive engagement with ngā iwi, reflect national direction, and address long-standing barriers in the TRMP that have limited Māori housing aspirations. The provisions provide a flexible and culturally appropriate framework, integrated with broader residential and infrastructure planning. **The risk of not acting** is significant. Retaining existing provisions would perpetuate inequities in access to housing for Māori, constrain the development of culturally aligned housing on Māori land, and fail to adequately recognise and provide for the

	increased runoff associated with development. Enabling additional papakāinga development within rural zones may result in some loss or reduced protection of highly productive land. However, this must be balanced against the statutory requirement to recognise and provide for the relationship of tāngata whenua with their ancestral lands (section 6(e) of the RMA), and to take into account the principles of the Treaty of Waitangi, including supporting rangatiratanga (section 8). In addition, the nature of papakāinga development and the use of restricted discretionary activity pathways limit the likelihood of subdivision or fragmentation of land. The application of general rules across zones also means that the full range of underlying rural land uses remains available to landowners, helping to retain productive use potential. While the NES-P now provides a nationally consistent enabling framework, Option (a) introduces a locally integrated approach to managing effects. This may result in some duplication, but also provides greater certainty as to how environmental effects will be addressed within the district-specific context. **Economic**	• the potential for integrated land use that combines residential, cultural, and productive activities on ancestral land; • opportunities for environmental restoration, including revegetation, riparian planting, and landscape enhancement as part of development; and • retention of larger landholdings, as papakāinga development is less likely to involve subdivision and fragmentation compared to alternative rural development patterns. All proposed papakāinga zoning and provisions have been assessed through the FDS and subsequent site assessment processes, and are subject to methods that avoid, remedy, or mitigate adverse environmental effects. While some papakāinga development may occur in locations that are less accessible to services and therefore more reliant on private vehicle use, these effects are balanced by the broader cultural, social, and environmental benefits	Environmental Standard for Papakāinga (NES-P), which has since been gazetted and will shortly become operative. The NES-P enables papakāinga development through a nationally consistent framework. If implemented as consulted on, it would enable papakāinga development in a broadly similar manner to PC81, although with limitations relating to Māori ancestral land that may constrain development opportunities in Tasman. The PC81 provisions have been aligned with the national direction where appropriate, particularly where the NES framework is more enabling than the earlier PC81 drafting. This alignment supports consistency between the district plan and national standards and contributes to improved plan effectiveness. In this context, both Option (a) and Option (c) are capable of enabling papakāinga development. Option (a) remains effective in providing a clear and integrated local framework within the TRMP, while Option (c) would rely more directly on the NES-P provisions. Option (a) therefore provides a more locally tailored and certain implementation pathway, while Option (c) provides a simpler but less integrated approach. **Efficiency** The proposed general rules framework for papakāinga development (section 16.14) provides a high level of certainty for	relationship of tāngata whenua with their ancestral lands. It would also undermine Council's obligations under Te Tiriti o Waitangi and risk reputational damage, including erosion of trust with iwi partners. Given the strong evidence base, clear policy support, and alignment with iwi aspirations, the risk of acting is low, while the risk of not acting is high.

	Option (a) is more costly than the status quo, as it involves preparing and implementing a plan change alongside TRPS C1. However, it provides a comprehensive framework to give effect to the NPS-UD and align with the FDS. There are costs associated with providing infrastructure to support papakāinga development, particularly on land that is not currently serviced. Not all sites proposed for papakāinga zoning have been budgeted for in the current Long Term Plan, and some infrastructure investment may be required over time. Where development occurs on greenfield rural sites, on-site servicing (for example, water, wastewater, and stormwater) may be required. This can result in additional costs for landowners, depending on the timing of development and the availability of reticulated networks. Delaying papakāinga zoning until reticulated infrastructure is available is generally not practicable or equitable, given the fragmentation and limited availability of Māori ancestral land. The provisions therefore enable development to occur in a way that reflects these constraints, while recognising that some costs will be borne by landowners. In the context of the NES-P, Option (c) may offer a more streamlined and	associated with enabling development on ancestral land. **Economic** There are economic benefits for landowners, including Māori landowners, from enabling more intensive use of land through papakāinga development. As identified in earlier analysis, increased development potential can result in an uplift in land value. Option (a) provides the greatest level of enabling capacity for papakāinga development and therefore delivers the most benefit in terms of realising development opportunities for tāngata whenua. The proposed provisions also provide greater certainty for applicants. The establishment of permitted and restricted discretionary pathways reduces reliance on discretionary decision-making, which in turn reduces consenting costs and timeframes. The ability for applications to proceed on a non-notified basis is also expected to reduce costs for applicants. These factors have been	applicants and a consistent approach across zones. This supports efficient plan administration and reduces complexity in the resource consent process by providing clear activity pathways. The use of permitted and restricted discretionary activity statuses minimises the need for discretionary assessment and reduces consenting timeframes and costs. This contributes to achieving the objectives at a lower overall cost to the community and applicants compared with more discretionary approaches. However, in light of the NES-P, Option (a) introduces some duplication by including local provisions that overlap with nationally prescribed rules. Option (c), which would rely more directly on the NES-P, would avoid this duplication and may therefore be more efficient in terms of plan complexity and regulatory simplicity. Option (a) offsets this potential inefficiency by providing a coherent and integrated framework within the TRMP, reflecting local engagement and alignment with district-wide objectives and provisions. This improves usability and certainty for plan users and supports more consistent implementation. Overall, Option (a) achieves a high level of efficiency in implementation and administration, although Option (c) may offer greater efficiency in terms of regulatory	

	potentially lower-cost approach by relying on nationally consistent rules. In contrast, Option (a) introduces some duplication of regulatory provisions. However, this is offset by the benefits of a clear, locally integrated framework that aligns with the existing structure of the TRMP and provides greater certainty for implementation. **Social** Papakāinga development, particularly where it involves more intensive or mixed-use forms in urban areas, may result in changes to amenity values. These changes may be perceived as adverse by some, while providing positive outcomes for others, including increased housing choice and the ability for Māori to express cultural traditions and norms. The NPS-UD recognises that amenity values evolve over time, particularly in areas undergoing intensification, and that such change is not inherently an adverse effect. Proposed changes through TRPS C1 similarly acknowledge that amenity values in areas planned for growth will change over time. Social costs may arise where increased development places pressure on local services and facilities. The social impact assessment identified some infrastructure gaps, such as the provision of indoor community spaces in certain locations.	consistently identified by the development sector as important in facilitating housing delivery and apply equally to papakāinga development. Local businesses are also expected to benefit from increased population associated with papakāinga development, particularly where development occurs in or near existing urban areas. Enabling papakāinga development within residential and MDRZ zones supports a larger resident population in proximity to centres, contributing to increased demand for goods and services and supporting local economic activity. Findings from the social impact assessment in relation to MDRZ development are similarly applicable to papakāinga. In comparison with Option (c), which relies on the NES-P framework, Option (a) provides additional economic benefit through greater certainty and clarity of local provisions, although this must be balanced against the potential efficiency advantages of relying solely on national rules.	simplicity due to reliance on the national framework.	

	However, papakāinga development can provide opportunities for integrated solutions, including the provision of shared or community facilities as part of developments. While the NES-P enables papakāinga development nationally, Option (a) provides greater certainty around how these developments integrate with existing communities, infrastructure, and services at a local level. **Cultural** The papakāinga provisions in PC81 have been developed in close consultation with iwi and in collaboration with the papakāinga working group. This engagement has informed the design of the provisions to support a range of housing options and enable Māori to express their cultural values, traditions, and connections to land. Cultural costs associated with Option (a) are therefore expected to be limited. There are, however, ongoing resource implications. Implementation of the provisions will require continued engagement with iwi, monitoring of outcomes, and further development of Council's internal cultural capability. These activities involve cost to both Council and iwi.	**Social** Providing for papakāinga development contributes to increasing the supply and diversity of housing stock. Housing affordability has been identified as a significant issue in Tasman, based on evidence from the HBA, monitoring reports, and affordability indices. Increasing development capacity through papakāinga across residential and rural zones supports efforts to meet demand and improve affordability outcomes. Enabling papakāinga development within towns supports their growth and diversification, reinforcing their role as key community centres. The social impact assessment prepared for PC81 identified positive effects associated with increased density, including improved housing diversity and enhanced vitality of centres. These findings are equally applicable to papakāinga development. Papakāinga development may also provide indirect social benefits by alleviating pressure on the wider housing market. To		

	However, these costs also provide a benefit by strengthening partnerships, improving understanding, and supporting more effective implementation of provisions that give effect to Māori aspirations. While the NES-P provides a national enabling framework, Option (a) retains the advantage of having been developed through local engagement and reflects iwi-specific values and expectations within Tasman.	the extent that papakāinga housing meets the needs of some households, it may reduce demand for existing housing stock, potentially increasing availability within the rental and ownership market. **Cultural** The enabling of papakāinga development aligns strongly with the outcomes sought in iwi management plans, including Ngā Taonga Tuku Iho ki Whakatū Management Plan 2004 and Poipoia Te Ao Tūroa Environmental Strategy 2021. These documents emphasise the importance of enabling whānau, hapū, and iwi to live on and utilise their ancestral lands in ways that maintain cultural connections and practices. The papakāinga provisions in PC81 have been developed through close engagement with iwi and the papakāinga working group. This collaborative approach ensures that the provisions reflect local aspirations and support Māori cultural values and traditions. Option (a) is expected to increase the number of papakāinga		

		developments in the region, contributing to improved availability of culturally appropriate and affordable housing, as identified through iwi management plans. The provisions also support the exercise of kaitiakitanga and rangatiratanga by enabling tāngata whenua to develop and manage their land in accordance with their values. While the NES-P provides a national enabling framework, Option (a) delivers additional cultural benefits by embedding locally developed provisions that respond specifically to iwi values and expectations within Tasman.		
Economic Growth and Employment of option (a)	**Economic Growth** **Employment**			
	A fully enabling suite of papakāinga provisions, as proposed in Option (a), would have positive effects on economic growth in the Tasman District. By removing regulatory barriers and providing clear, enabling pathways for papakāinga development—including for land held by Māori organisations such as Wakatū Incorporation and Whakarewa Trust—this option would support investment, housing construction, and community-led development outcomes. The ability for iwi, hapū, and whānau to undertake papakāinga development at scale supports intergenerational wealth creation, strengthens economic resilience, and enables greater participation by Māori in the local economy. Increased construction activity and associated infrastructure investment would also generate wider economic benefits, supporting local businesses, suppliers, and service providers. Over time, enabling additional housing supply contributes to addressing housing shortages and improving affordability, supporting a more equitable and resilient regional economy. Option (a) would also generate employment opportunities across the district. The removal of barriers to papakāinga development supports a more consistent pipeline of development activity, creating employment for builders, tradespeople, planners, designers, and related professionals. As papakāinga communities are established and grow, additional demand is likely to arise for infrastructure maintenance, community services, and local businesses, further supporting employment.			

	The scale and certainty provided by a comprehensive enabling framework also supports the development of skills and capacity within the local workforce. This includes opportunities for Māori employment and training in construction, project management, and community development. Overall, Option (a) supports both short-term job creation and longer-term employment pathways, contributing to sustained economic and social benefits for the district.			
Proposed option (b)	**Costs (environmental, economic, social, cultural)**	**Benefits (environmental, economic, social, cultural)**	**Effectiveness and Efficiency**	**Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions**
Do not update the TRMP with a new package of provisions instead relying on its existing papakāinga provisions giving effect to the NPS-UD (status quo).	**Environmental** The environmental costs of the status quo position may involve continued inefficient use of land resource. The existing provisions in the TRMP do not enable the more efficient use of land for multi-unit papakāinga housing due to relatively conservative rules and conditions, which limit the number of residential units per site, and the number of land parcels eligible for papakāinga development with the intended controlled activity status, In addition the unclear plan drafting renders the intended controlled activity status invalid. Under the operative TRMP only two new papakāinga developments have been built, providing a total of 26 new homes. It is relevant for this option to note the draft NES for papakāinga was consulted on in May and June of 2025. This NES is expected to be	**Environmental** Any environmental benefits associated with retaining the status quo are limited and largely relate to delaying further development. This may defer potential environmental effects associated with additional papakāinga development in the short term. However, this is only a temporary outcome. Growth pressures will continue, and in the absence of a clear planning framework, development is more likely to occur in an ad hoc manner through private plan changes or resource consent applications. This creates a risk of less coordinated outcomes and reduced ability to appropriately manage environmental effects. The operative TRMP provisions have not been effective in enabling papakāinga development, and as a result, inefficient land use patterns are likely to continue. While the NES-P now provides a national framework enabling papakāinga	**Effectiveness** Without PC81 Council would have more control over the nature of papakāinga development proposed and potentially allowed. The growth pressures would remain regardless of PC81 proceeding or not. Relying on existing papakāinga provisions, including zonings of land would be ineffective in enabling Council to provide sufficient housing choice to meet demand. Existing objectives on urban growth in the TRMP are quite general and open. They do not address the need for papakāinga development for example, nor the location of papakāinga development in the urban environment. The provisions of plan change 78 (2023) have provided for the site with papakāinga zone in St Arnaud, but more regulatory focus is needed to enable greater housing choice in the	**Risk of not acting** Council has a strong evidence base to support PC81, including the FDS, the Housing and Business Capacity Assessment 2024, and supporting surveys such as the Housing Preferences Survey 2021. While that survey does not specifically address demand for papakāinga and is noted as underrepresenting Māori communities, it confirms that the current housing stock in Tasman is heavily skewed towards stand-alone dwellings. Retaining the status quo would maintain a lack of housing choice, including culturally appropriate housing. While the NES-P now provides a national enabling framework for papakāinga development, reliance solely on this framework is unlikely to fully meet demand in the Tasman context. Limitations relating to land eligibility and the absence of a locally integrated planning framework mean that development

	finalised and operative (Gazetted) by the end of 2025. If the NES is to become operative with the same provisions that were consulted on, this would override the operative TRMP provisions and enable papakāinga development in much the same manner as the provisions proposed in PC81, except that permitted papakāinga development in all zones (including the Papakāinga Zone) will be subject to permitted activity standards limiting the number of residential units to 10, and limiting the land eligible to be used for papakāinga development to Māori Ancestral Land, being a defined term limited to land held with specifically listed land status'. Information provided by the Iwi Working Group and Te Puni Kōkiri Ministry of Māori Development has identified that much of the land in the Tasman region held by tāngata whenua (or on their behalf by trusts such as Wakatū Incorporated and Ngāti Rārua Ātiawa Iwi Trust / Whakarewa Trust) will not meet the draft NES definition of Māori Ancestral Land. This exclusion is because the definition in the NES doesn't reflect the way in which land was historically alienated or	development, it does not provide a locally integrated approach to managing environmental effects within the Tasman context. Accordingly, any short-term environmental benefit from delaying development is outweighed by the longer-term risk of uncoordinated development and less efficient land use outcomes. **Economic** This option has lower direct costs than Option (a), as it does not involve preparing and implementing a plan change. However, it results in the TRMP remaining out of date and not fully aligning with the NPS-UD, TRPS C1, or the FDS. While the NES-P introduces an enabling national framework, reliance solely on this approach may result in a less integrated planning framework. This can create uncertainty and reduce efficiency for plan users, particularly where national provisions must be interpreted alongside existing district plan provisions. More significantly, the status quo is unlikely to address the identified shortfall in housing supply. Ongoing constraints on papakāinga development are likely to contribute to continued	urban environment, if objective 4 of the FDS is to be realised. To continue to rely on the existing provisions for papakāinga development, may not be effective. A review of the existing papakāinga development provisions in 2024, found that consultants concluded the existing rules are complicated, which reduces their effectiveness. **Efficiency** The TRMP is outdated but it is not the appropriate time to undertake a full review of the TRMP when new plan- making legislation is currently being written by Government. However to not update parts of the TRMP to give effect to the NPS-UD, while also having regard to the FDS and TRPS C1, would also be inefficient given the significant time lag between when the new Government came into power and new legislation being enacted. In the interim, PC81 can provide for the additional housing choice and capacity needed for the next 10 years, which includes papakāinga development. If PC81 did not proceed and existing provisions of the TRMP were relied upon for papakāinga development, resource consent assessment would	opportunities may remain constrained in practice. In addition, by not updating the TRMP, the current uncertainty and inconsistency in the resource consent framework would persist. Decisions on papakāinga development would continue to be made within an incomplete and unclear policy setting, resulting in inefficient and potentially inconsistent outcomes. Overall, the risk of not acting is that housing choice remains constrained, papakāinga development continues to be limited in practice, and Council does not adequately respond to identified housing needs or provide a clear and effective planning framework. **Risk of acting** For Option (b), the risk of acting is not applicable, as the option involves retaining the status quo and not undertaking further changes.

	exchanged since the 1840's under various different Acts, Orders in Council, Crown Grants, Treaty settlement claims and general sales or purchases. The status of land in the region relevant for this definition is further complicated by the ongoing appeal by the Crown of the 2017 Supreme Court decision regarding the Nelson 10ths agreement in the original land purchase by the New Zealand Company. The submission of Te Rūnanga o Ngāti Rārua on the draft NES states that under the draft NES definition of Māori Ancestral Land only 0.01% of the Tasman region is held as Māori land. Taking this into consideration it is unlikely that the NES would enable substantive development of papakāinga as a permitted activity. **Economic** The TRMP currently does not contain sufficient zoned land and provisions to meet expected housing demand and housing choice over the next ten years. If the TRMP is not changed to enable more papakāinga development the shortfall in this type of housing will be greater than currently estimated in the latest HBA. This will come at an economic	housing affordability issues, which in turn have broader economic impacts, including constraints on labour supply and business growth. **Social** Some members of the community may see a benefit in limiting further development, particularly where there is concern about population growth or change in settlement character. However, failing to plan for growth, including papakāinga development, means that the wider social needs of the community are not met. This includes the need for a sufficient supply and diversity of housing, which has been identified as a significant issue in Tasman. Although the NES-P enables papakāinga development at a national level, its application in Tasman may be limited by land eligibility and the absence of locally tailored provisions. As a result, social benefits associated with increased housing supply and diversity may not be fully realised under this option. **Cultural** Limited cultural benefits arise from this option. While the NES-P provides a national enabling framework for papakāinga, it does not reflect the specific cultural context, land ownership	still be undertaken in an incomplete and unclear policy setting. Disagreement can sometimes revolve around unclear or potentially subjective provisions, which leads to inefficient consent processing and decision making.	

	cost for Tasman's community and businesses if house prices continue to be unaffordable and employees new to the area are unable to find a dwelling. Te Rūnanga o Ngāti Rārua note in their submission on the draft NES that it took one of their whānau over seven years to obtain resource consent for their papakāinga. This was largely attributed to inadequate and inconsistent planning provisions in the district plan. Along with the time delay, significant financial costs were incurred for the whānau involved. **Social** The social impact analysis prepared for PC81 identifies positive impacts from the MDRZ rules on housing supply, diversity of housing, benefits for businesses and consequent social effects. With the relatively low levels of intensification occurring currently in Tasman's main towns under operative rules, these benefits would not be realised and could constitute indirect costs. This assessment is equally applicable to papakāinga development which further diversifies housing choice. If intensification of housing land is not further enabled, known demand	patterns, and aspirations of iwi within Tasman. In the absence of locally developed provisions, opportunities to provide for papakāinga development in a manner that aligns with iwi values and aspirations are likely to be constrained. This includes limited ability to enable development on land that does not fall within the NES definition of Māori ancestral land but is nonetheless significant to tāngata whenua. More broadly, reliance on the status quo does not adequately recognise and provide for the relationship of tāngata whenua with their ancestral lands, nor does it support the exercise of rangatiratanga to the same extent as a locally tailored framework.		

	for papakāinga housing will be unmet, potentially leading to even higher house prices for the community. The outdated nature of the existing papakāinga provisions has been identified by tāngata whenua. This is imposing social (as well as economic) costs on the people of Ngati Kuia, Rangitāne, Ngāti Apa Ki te Rā Tō, Ngāti Koata, Ngāti Rārua, Ngāti Toa Rangatira, Ngāti Tama, Te Ātiawa or Ngāti Waewae. In the absence of change these costs would continue. **Cultural** Tasman is a region that is growing and if the TRMP is not changed, papakāinga development opportunities will not be realised in a manner sufficient to provide a variety of homes that meet local needs and enable Māori to express their cultural traditions and norms. The social impact analysis prepared for PC81 identifies positive impacts from the MDRZ rules on social cohesion and culture, with potential for diverse community events in the towns with more people living there. In the absence of the MDRZ with probable continued modest increases in the number of people			

	living in town, these opportunities could be missed and constitute indirect costs. This assessment is equally applicable to papakāinga development which further diversifies housing choice.			
Economic Growth and Employment of option (b)	**Economic Growth**		**Employment**	
	Failing to provide for additional housing capacity, including papakāinga development, would have negative economic consequences in a region where population growth is expected to continue. Growth supports the local economy, particularly through the construction and housing sectors, and has wider productivity benefits. Without sufficient housing supply, these economic benefits are constrained. Option (b) would not address the existing and well-documented challenges faced by businesses in attracting and retaining employees. Limited housing availability reduces the ability of workers to locate within the region, which in turn constrains labour supply. Evidence indicates that housing, employment, and broader living conditions are key factors influencing business performance in Tasman. Retaining the status quo would therefore continue to limit economic growth and employment outcomes for the district.			
Proposed option (c)	***Costs (environmental, economic, social, cultural)***	***Benefits (environmental, economic, social, cultural)***	**Effectiveness and Efficiency**	**Risk of Acting / Not Acting if there is uncertain or insufficient information about the subject matter of the provisions**
Amend the TRMP but with fewer papakāinga provisions and less prescription, introducing overarching objectives and policies to implement NPS-UD direction, while relying primarily on the National Environmental Standards for	Environmental Environmental costs may arise where papakāinga development is not sufficiently enabled in preferred or well-located areas, potentially limiting efficient land use outcomes at a district-wide scale. However, under this option, papakāinga development would be enabled primarily through the NES-P framework, which provides a structured and nationally consistent approach. This reduces the risk of uncoordinated or ad hoc	**Environmental** Environmental benefits arise from retaining existing environmental safeguards and assessment processes, including district and regional plan controls for matters such as infrastructure, natural hazards, and environmental overlays. In addition, the NES-P provides a structured and nationally consistent framework for papakāinga development, including limits on scale and activity status thresholds. These constraints may reduce the likelihood of	**Effectiveness** Under this option, papakāinga development would be enabled primarily through the NES-P framework, supported by higher-level objectives and policies in the TRMP. The NES-P provides a nationally consistent rule framework, including permitted activity pathways for developments of up to 10 residential units per site and restricted discretionary pathways for larger developments.	The proposed rezoning of papakāinga sites has been signalled through the FDS, which involved extensive consultation with the community. As a result, there is a high degree of certainty around the preferred direction for growth and development, including the role of papakāinga. There are, however, risks associated with proceeding with this compromise option. While the NES-P provides an enabling national framework for papakāinga

Papakāinga (NES-P) to provide the rule framework for papakāinga development (including further zoned land where appropriate).	development compared with relying on existing TRMP provisions alone. In addition, the NES-P framework includes activity status pathways and standards that limit the scale and intensity of development, which may reduce the risk of overdevelopment in sensitive rural or peri-urban environments. Existing district and regional plan controls for matters such as infrastructure, natural hazards, and environmental overlays would continue to apply. While environmental effects can be appropriately managed under this option, the absence of a locally tailored framework limits the ability to direct development to the most suitable locations or achieve integrated environmental outcomes specific to the Tasman context. Economic Economic benefits for Māori landowners and the wider community are reduced compared to Option (a), as the NES-P framework places limits on both the scale of development and the land to which it applies. While the NES-P provides more enabling pathways than the existing TRMP provisions—through permitted and restricted discretionary activity statuses—these are constrained by factors such as the maximum number of units per site and the definition of Māori ancestral land. In the Tasman	overdevelopment in sensitive rural or peri-urban environments. Some positive environmental effects may also occur where additional papakāinga zoning is applied and development is well located and designed. However, the absence of a locally tailored framework limits the ability to direct development to the most appropriate locations or achieve integrated environmental outcomes specific to the Tasman context. **Economic** Some economic benefits would arise from the enabling provisions in the NES-P, allowing papakāinga development to proceed on eligible land without the need for extensive plan change processes. This provides a clearer and more efficient pathway than the existing TRMP provisions. However, overall economic benefits are reduced compared to Option (a). Constraints within the NES-P, including limits on development scale and land eligibility, mean that fewer and smaller developments are likely to occur. This limits the level of investment, construction activity, and associated economic uplift.	This represents a significant improvement in effectiveness compared to relying on the existing TRMP provisions alone. The NES-P provides clearer and more accessible pathways for papakāinga development, reducing uncertainty and increasing the likelihood that development will occur in practice. However, the effectiveness of this option remains constrained relative to Option (a). The NES-P imposes limits on both the scale of development and the land to which it applies, including restrictions associated with the definition of Māori ancestral land and thresholds on the number of residential units per site. In the Tasman context, this limits the extent to which papakāinga development can occur across the full range of land held by iwi, hapū, and whānau. A further limitation of this option is that it does not provide a locally integrated or tailored framework. While the NES-P enables development in principle, it does not address the specific land ownership patterns, spatial context, or aspirations of iwi within Tasman. This reduces the ability of the planning framework to achieve locally relevant outcomes at scale.	development, it imposes limits on both the scale of development and the types of land to which it applies. In the Tasman context, these constraints mean that not all land held by iwi, hapū, and large Māori organisations can be readily developed for papakāinga, and that development may be restricted in scale. As a result, there is a risk that this option will not fully achieve the aspirations of iwi, hapū, and whānau, particularly where larger-scale or more flexible development is sought, or where land does not clearly fall within the NES eligibility criteria. This may lead to continued barriers for some landowners and limit the overall uptake of papakāinga development across the district. There is also a risk that relying primarily on a national framework, without a robust locally tailored set of provisions, will result in a lack of integration with the wider TRMP framework. This could reduce clarity for plan users and limit the ability to achieve coordinated outcomes in relation to infrastructure, land use, and environmental management.

	context, this limits the extent to which papakāinga development opportunities can be realised. As a result, some papakāinga developments are likely to proceed under this option, but at a smaller scale or on fewer sites than under Option (a). This constrains the overall level of economic uplift associated with development, including construction activity and associated benefits. Council and iwi may realise some short-term cost savings by not implementing a comprehensive local framework. However, these are offset by reduced long-term economic opportunities, including for Māori landowners and the wider regional economy. Social Social benefits would be realised under this option through the enabling framework provided by the NES-P. Some papakāinga development is likely to occur, contributing to increased housing supply and diversity. However, the scale and diversity of outcomes would be more limited than under Option (a). Constraints within the NES-P framework, including limits on development scale and land eligibility, mean that not all demand for papakāinga housing can be met.	While some economic gains may occur where papakāinga zoning is introduced or development proceeds under the NES, the overall impact on housing supply and economic outcomes is more limited. **Social** Some social benefits would arise under this option, as the NES-P enables papakāinga development and allows some increase in housing supply and diversity. However, the scale and extent of these benefits is likely to be limited. Constraints within the NES-P framework mean that demand for papakāinga housing cannot be fully met, particularly where land does not meet eligibility criteria or where larger-scale developments are sought. As a result, improvements in housing choice and social outcomes are likely to be localised, rather than widespread across the district. **Cultural** This option recognises the importance of papakāinga through both the NES-P framework and supporting objectives and policies in the TRMP. Some cultural benefits will be realised where papakāinga development	Overall, while Option (c) is effective in enabling papakāinga development to a degree, it is less effective than Option (a) in delivering the full range of intended housing, cultural, and development outcomes. **Efficiency** Option (c) is likely to be more efficient than Option (a) in terms of plan-making and regulatory simplicity. It avoids the need to introduce a comprehensive suite of local provisions and relies instead on the nationally prescribed NES-P framework. The NES-P provides clear activity status pathways and limits the scope of district plan rules that apply, which simplifies the regulatory framework for applicants and reduces duplication between national and local provisions. This can reduce plan complexity and improve usability for some plan users. However, this efficiency is partly offset by the limitations of relying on a national framework alone. The absence of locally tailored provisions may result in gaps or inconsistencies when applying the NES-P alongside the existing TRMP. Plan users may	In addition, while this option represents an improvement over the status quo, it may not provide sufficient certainty or flexibility to deliver papakāinga development at the scale required to address identified housing needs. This creates a risk that housing inequities persist and that demand for culturally appropriate housing remains unmet. From a Council perspective, there is also a risk that a more limited approach may require further plan changes or policy development in the future to address gaps or unintended constraints arising from reliance on the NES framework alone. This could result in additional costs, delays, and ongoing uncertainty. Overall, while Option (c) provides a viable and nationally consistent approach, there is a moderate risk that it will not fully deliver on local housing, cultural, and development outcomes, and that further intervention may be required over time.

	As a result, barriers to papakāinga development would persist for some Māori landowners, particularly where land does not meet the definition of Māori ancestral land or where larger-scale development is sought. This may contribute to the continued under-supply of culturally appropriate housing and ongoing housing inequities. Some positive social outcomes may be achieved where papakāinga development occurs, but these are likely to be more localised and less consistent across the district. Cultural This option recognises the importance of papakāinga development and Māori aspirations by enabling development through the NES-P framework. However, the framework is nationally derived and does not fully reflect the specific land ownership patterns, historical context, and aspirations of iwi within Tasman. In particular, limitations relating to land eligibility and development scale may restrict the ability of tāngata whenua to fully exercise rangatiratanga over their land. While some cultural benefits will be realised where papakāinga development occurs, the overall level of development is likely to be constrained compared with Option	proceeds, enabling whānau to live on and utilise their land in accordance with their values and traditions. However, the nationally derived nature of the NES-P means it does not fully reflect the specific context of iwi in Tasman. Constraints relating to land eligibility and development scale may limit the ability of tāngata whenua to fully exercise rangatiratanga over their land. While this option represents a step forward compared to the existing framework, it does not provide the same level of locally responsive and enabling outcomes as Option (a), and may not fully meet iwi aspirations across the district.	need to interpret how national rules interact with local provisions for matters such as infrastructure, hazards, and environmental effects, which can reduce overall efficiency in practice. In addition, where land does not meet the eligibility criteria under the NES-P, or where larger-scale development is sought, applicants may still face more complex and uncertain consenting pathways. This can result in inefficiencies, including additional time and cost. Overall, while Option (c) offers greater efficiency in terms of regulatory simplicity, it is less efficient in achieving outcomes at scale and in providing a coherent, locally integrated planning framework when compared to Option (a).	

	(a). This may limit opportunities for whānau, hapū, and iwi to live on and utilise their ancestral land in a manner that supports cultural practices and intergenerational wellbeing. Accordingly, while this approach provides a nationally consistent enabling framework, it does not deliver the same level of culturally appropriate and locally responsive outcomes as a comprehensive, locally developed set of provisions.			
Economic Growth and Employment of option (c)	Economic Growth The economic benefits of this option are reduced compared to a fully enabling approach. While the NES-P provides an enabling framework for papakāinga development, including permitted and restricted discretionary pathways, its application is constrained by limits on development scale and the types of land to which it applies. As a result, fewer and smaller-scale developments are likely to occur than under Option (a). Some Māori landowners may experience economic benefits, including the ability to proceed with papakāinga development and associated increases in land utilisation and value. However, in the Tasman context, a significant proportion of land held by iwi, hapū, and Māori organisations may not fully benefit from the NES framework, or may be limited in the scale of development that can be achieved. This constrains opportunities for broader economic participation, intergenerational wealth creation, and community-led investment. The NES-P also provides clearer activity pathways than the existing TRMP provisions, which may reduce some consenting costs and uncertainty. However, the absence of a locally tailored framework means that development opportunities are not maximised, and economic outcomes remain more limited in scale and distribution. Over the longer term, this option may not fully support the level of housing supply needed to respond to demand, which can continue to impact housing affordability, labour supply, and overall economic performance in the district. **Employment** Employment opportunities under this option would be positive but constrained. The NES-P framework would enable papakāinga development to proceed on some sites, generating employment in construction, infrastructure, and supporting services. However, due to the limits on development scale and land eligibility, the overall volume and continuity of development activity are likely to be lower than under a more enabling framework. This reduces the potential for a sustained pipeline of projects and limits the broader employment benefits that may otherwise arise.			

	In particular, the ability of iwi, hapū, and Māori organisations to undertake papakāinga development at scale is constrained under this option, which limits opportunities for ongoing employment, skill development, and capacity building within the local workforce. As a result, while this option would support some job creation, it would not deliver the same level or consistency of employment opportunities as a more comprehensive and locally tailored approach.
Overall Evaluation	After assessing the costs, benefits, effectiveness, efficiency, and risks associated with each option, Option (a)—the introduction of a comprehensive suite of new papakāinga provisions—is the most effective and appropriate approach for achieving the objectives of Plan Change 81 and giving effect to national policy direction. Option (a) would deliver substantial benefits for the Tasman District by removing long-standing regulatory barriers and providing clear, enabling pathways for papakāinga development across a wide range of Māori landholdings, including those held by iwi, hapū, and Māori organisations. This approach supports intergenerational wealth creation, cultural revitalisation, and social wellbeing for Māori, while also generating economic growth and employment opportunities for the wider community. The certainty and clarity provided by a fully integrated framework reduces costs and delays for applicants, encourages investment, and supports the development of skills and capacity within the local workforce. By aligning with the aspirations of iwi and hapū, and giving effect to the NPS-UD and relevant Treaty considerations, Option (a) provides a coherent and locally tailored response to current and future housing needs. Option (b), which retains the status quo and relies on the existing TRMP provisions, is clearly inadequate. The current rules are incomplete and have proven ineffective in enabling papakāinga development in practice. While the NES-P provides a national enabling framework, reliance on the operative TRMP alongside the NES results in an incomplete and poorly integrated planning framework. Under this option, papakāinga development would remain constrained in practice, resulting in ongoing housing inequity, limited development uptake, and missed economic and cultural opportunities. The status quo does not adequately give effect to national policy direction or respond to local aspirations, and would likely require further amendment in the near future. Option (c), which introduces a higher-level policy framework in the TRMP while relying primarily on the NES-P for the rule framework, represents a viable alternative. This option provides a nationally consistent and relatively efficient approach to enabling papakāinga development, including permitted and restricted discretionary activity pathways. However, the effectiveness of this option is constrained by the limits within the NES-P, including restrictions on development scale and the types of land to which it applies. In the Tasman context, these constraints mean that papakāinga development is unlikely to occur at the scale required to meet identified demand or fully realise iwi and hapū aspirations. In addition, the absence of a locally tailored framework limits the ability to integrate papakāinga development with broader planning outcomes and reflect the specific land ownership patterns and cultural context of the district. While Option (c) offers advantages in terms of regulatory simplicity and reduced plan complexity, it does not deliver the same level of enabling capacity, flexibility, or locally responsive outcomes as Option (a). It therefore represents a moderate improvement over the status quo, but does not provide a comprehensive solution. In summary, Option (a) is preferred as it provides the most effective and appropriate response to the challenges and opportunities associated with papakāinga development in the Tasman District. It delivers a more enabling, integrated, and locally tailored framework that supports housing, cultural, and economic

	outcomes for Māori and the wider community. Option (c) remains a reasonably practicable alternative but is constrained in its ability to deliver these outcomes at scale, while Option (b) fails to achieve the required objectives and is not recommended.

Recommended option

After consideration of the costs, benefits, effectiveness, efficiency, and risks associated with each of the three options for papakāinga provisions, it is recommended that option (a)—the introduction of a comprehensive suite of new papakāinga provisions—is adopted. This option provides the most robust and enabling framework for papakāinga development in the Tasman District, directly addressing long-standing barriers faced by Māori landowners and organisations, including Wakatū Incorporation and Whakarewa Trust. By removing regulatory obstacles and providing clear, consistent pathways for papakāinga across a wide range of Māori landholdings, option (a) will support intergenerational wealth creation, cultural revitalisation, and social wellbeing for Māori, while also delivering significant economic growth and employment benefits for the wider community.

Option (a) aligns with the aspirations of iwi, hapū, and whānau, and gives effect to the requirements of the NPS-UD, Treaty principles, and has regard to Council's FDS. It is the most effective and efficient approach for achieving the objectives of Plan Change 81, providing certainty for applicants, reducing costs and delays, and fostering the development of specialist skills and capacity within the local workforce. In contrast, options (b) and (c) would perpetuate existing barriers, fail to deliver the scale of change required to meet identified housing needs, and risk ongoing inequity, inefficiency, and reputational harm for Council. For these reasons, the comprehensive suite of papakāinga provisions set out in option (a) is strongly recommended as the preferred approach.

11. Conclusion

This evaluation has been undertaken in accordance with s 32 of the RMA. The evaluation identifies the need, benefits and costs and the appropriateness of the proposal having regard to its effectiveness and efficiency relative to other means in achieving the purpose of the RMA (and established planning documents prepared under the RMA). The evaluation demonstrates that the regulatory approach that this proposal takes is the most appropriate option in giving effect to the objectives, which are in turn giving effect to the NPS-UD and having regard to TRPS C1 and Council's FDS and the MMP.

In respect of the proposed residential provisions, PC81:

- balances competing objectives by providing more housing land capacity for the next 10 years to meet anticipated demand, but minimising impacts on the natural environment. Potential environmental impacts and economic costs (e.g. arising from new infrastructure for further growth) have been considered and are either already included in the Council's Long Term Plan and its Infrastructure Strategy, or else can be included in the next iteration of the LTP to ensure that infrastructure is available to service housing growth locations.

- The provisions of PC81 acknowledge that intensification in urban areas can detract from amenity values appreciated by some people but improve amenity values of others. This approach implements both the NPS-UD's interpretation of amenity and that in TRPS C1.

- The overall environmental, economic, social and cultural benefits of both additional housing capacity in Tasman and medium density housing are evaluated and outweigh the costs. Introducing a new MDRZ is the most effective and efficient way of securing increased density housing in our main towns, including providing more smaller attached dwellings. It also seeks to ensure efficient use of greenfield sites on the edges of towns by providing for medium density in these locations. Using a quantitative design matrix is an effective way of ensuring urban design outcomes are achieved in existing residential areas. Using OSPs in greenfield areas ensures efficient and effective future planning of growing communities.

- There is a wealth of data and information on housing demand in Tasman and strategic planning has already been undertaken with the FDS. The risk of proceeding with PC81 is therefore minimal on this basis

- Existing TRMP residential objectives have not provided sufficient capacity of smaller attached dwellings as demonstrated in recent HBAs. Providing fuller residential objectives in PC81 and associated methods, better assists the Council in carrying out its statutory functions and meeting RMA and NPS-UD requirements.

- The amenity provisions provide a clear and deliberate framework for managing the effects of intensification by recognising that amenity values will change over time. This approach enables higher density development while maintaining appropriate baseline amenity outcomes, and supports a well-functioning urban environment through a balance between urban design, built form controls and the Medium Density Residential Design Matrix.

In respect of the proposed commercial provisions, PC81:

- Also balances competing objectives by providing more zoned commercial and mixed business land for the next 10 years to meet expected demand, but minimising impacts on the natural environment. It also proposes releasing this capacity with safeguards in place to restrict uncontrolled growth of large format retail, out of centre, which could be to the detriment of Tasman's existing town centres

- Provides environmental benefits arising from a compact urban form reducing general reliance on cars for travel and situating new commercial development in closer proximity to amenities and services. Such benefits outweigh the costs of zoning more land
- The overall environmental, economic, social and cultural benefits of additional commercial capacity in Tasman are evaluated and outweigh the costs
- Adverse environmental effects of the proposed commercial sites being developed have been thoroughly assessed and can be avoided or mitigated
- Economic benefits would exist for the community from PC81 as well as for businesses and for new employees looking to move to the region
- Social cohesion benefits for the community would arise from PC81 with the focus on strengthening existing commercial centres
- A wealth of data and information exists on Tasman's commercial centres, commercial land demand and likely effects from large format retail. The risk of proceeding with PC81 is therefore minimal on this basis
- PC81 would assist Council with carrying out its statutory functions (its commercial land capacity function). It is also within the scope of higher level documents - not only NPS-UD but also Council's adopted FDS and concurrent TRPS C1.

In respect of the proposed papakāinga provisions:

- This evaluation demonstrates that the comprehensive suite of papakāinga provisions introduced through PC81 is the most appropriate and effective approach for enabling papakāinga development in the Tasman District. The new provisions directly address long-standing barriers faced by tāngata whenua in developing housing on their ancestral land, including overly complex and restrictive rules, lack of clear policy direction, and limited recognition of papakāinga outside the Papakāinga Zone.
- The new objectives (10A.2.1 and 10A.2.2) and supporting policies are grounded in robust engagement with ngā iwi, alignment with the NPS-UD and the Council's FDS. They give effect to national and regional policy direction, and reflect the aspirations of iwi, hapū, and whānau for intergenerational wellbeing, cultural revitalisation, rangatiratanga over land use and development and potential to reconnect with their ancestral lands.
- The evaluation of options confirms that a fully enabling framework (Option A) delivers the greatest environmental, economic, social, and cultural benefits. It provides certainty and clarity for applicants, reduces costs and delays, and supports the development of papakāinga at a scale that meets identified demand. The provisions are designed to be flexible and culturally appropriate, allowing for papakāinga in a wide range of zones and landholdings, including those managed by major Māori organisations such as Wakatū Incorporation and Whakarewa Trust. This approach ensures that the benefits of papakāinga—such as affordable housing, community cohesion, and cultural expression—are accessible to a broad cross-section of Māori in the region.
- The risks of not acting, or of adopting a less comprehensive approach, are significant. Retaining outdated or incomplete provisions would perpetuate inequities in housing access for Māori, constrain the development of culturally aligned housing, and undermine Council's obligations under Te Tiriti o Waitangi. It would also risk reputational harm and

erode trust with iwi partners, and may require further plan changes in the future to address persistent barriers and unmet needs.

- In summary, the papakāinga provisions in PC81 represent a robust, future-focused solution that aligns with national and regional policy, meets the aspirations of iwi and hapū, and delivers broad and lasting benefits for Māori and the wider community. The approach is both effective—delivering on statutory and community objectives—and efficient, streamlining processes and reducing long-term costs. The Council's commitment to ongoing partnership with ngā iwi, and to monitoring and refining the provisions as needed, will ensure that papakāinga development continues to support intergenerational wellbeing and the sustainable management of land and resources in the Tasman District.

Appendix 1 - TRMP Schedule of Amendments and Maps

Appendix 2 - PC81 Site Assessment Report

Appendix 3 – PC81 Infrastructure Report

Appendix 4 - Housing and Business Assessment for Tasman 2024

Appendix 5 – PC81 Transportation Memorandum

Appendix 6 – On-site Wastewater Disposal Assessment Report - Proposed Rural Residential Sites

Appendix 7 - TRMP Noise Limit Changes PC81 Memorandum

Appendix 8 –Capacity Estimates Proposed Urban Growth PC81 Memorandum

Appendix 9 – Social Impact Assessment of Proposed Medium Density Residential Zoning of Richmond, Wakefield and Brightwater

Appendix 10 - Open Space Assessment Richmond Ward

Appendix 11 – Impact Assessment for Potential Retail Development Scenarios in Tasman

Appendix 12 – Tasman District Town Centre Audit Update

Appendix 13 - Engagement Summary with Nga Iwi on PC81 and TRPS C1

Appendix 14 - Workers Accommodation Memorandum

Appendix 15 – Medium Density Residential Provisions of PC81 Memorandum

Appendix 16 - Engagement Summary including RMA Clause 32 Engagement

Appendix 17 – Coastal Inundation Assessment of Specific Māpua Masterplan Sites

Appendix 18 – Preliminary Geotechnical Report for Potential Land Rezoning at 120 Higgs Road and 49 Stafford Drive Māpua

Appendix 19 – PC81 Mixed Business Zone Provisions Issues and Options – Retail Activities

Appendix 20 - TRMP and Proposed PC81 Wiring Assessment

Appendix 21 - Relevant sections of the RMA

Section 32 (as amended by the Resource management (Freshwater and Other Matters) Amendment Act 2024)

32 Requirements for preparing and publishing evaluation reports

(1) An evaluation report required under this Act must—

(a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and

(b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—

(i) identifying other reasonably practicable options for achieving the objectives; and

(ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and

(iii) summarising the reasons for deciding on the provisions; and

(c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

(2) An assessment under subsection (1)(b)(ii) must—

(a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—

(i) economic growth that are anticipated to be provided or reduced; and

(ii) employment that are anticipated to be provided or reduced; and

(b) if practicable, quantify the benefits and costs referred to in paragraph (a); and

(c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

(3) If the proposal (an **amending proposal**) will amend a regional policy statement, plan, or change that is already proposed or that already exists (an **existing proposal**), the examination under subsection (1)(b) must relate to—

(a) the provisions and objectives of the amending proposal; and

(b) the objectives of the existing proposal to the extent that those objectives—

(i) are relevant to the objectives of the amending proposal; and

(ii) would remain if the amending proposal were to take effect.

(4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.

(4A) If the proposal is a proposed policy statement, plan, or change prepared in accordance with any of the processes provided for in Schedule 1, the evaluation report must—

(a) summarise all advice concerning the proposal received from iwi authorities under the relevant provisions of Schedule 1; and

(b) summarise the response to the advice, including any provisions of the proposal that are intended to give effect to the advice.

(5) The person who must have particular regard to the evaluation report must make the report available for public inspection at the same time as the proposal is notified.

(6) In this section,—
objectives means,—
(a) for a proposal that contains or states objectives, those objectives:
(b) for all other proposals, the purpose of the proposal
proposal means a proposed regional policy statement, plan, or change for which an evaluation report must be prepared under this Act
provisions means,—
(a) for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change:
(b) for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.

32AA Requirements for undertaking and publishing further evaluations
(1) A further evaluation required under this Act—

(a) is required only for any changes that have been made to, or are proposed for, the proposal since the evaluation report for the proposal was completed (the **changes**); and

(b) must be undertaken in accordance with section 32(1) to (4); and

(c) must, despite paragraph (b) and section 32(1)(c), be undertaken at a level of detail that corresponds to the scale and significance of the changes; and

(d) must—

(i) be published in an evaluation report that is made available for public inspection at the same time as the decision on the proposal is notified; or

(ii) be referred to in the decision-making record in sufficient detail to demonstrate that the further evaluation was undertaken in accordance with this section.

(2) To avoid doubt, an evaluation report does not have to be prepared if a further evaluation is undertaken in accordance with subsection (1)(d)(ii).

(3) In this section, **proposal** means a proposed regional policy statement, plan, or change for which a further evaluation must be undertaken under this Act.

32A Failure to carry out evaluation
(1) A challenge to an objective, policy, rule, or other method on the ground that an evaluation report required under this Act has not been prepared or regarded, a further evaluation required under this Act has not been undertaken or regarded, or section 32 or 32AA has not been complied with may be made only in a submission under section 149E, 149F, or 149O or under Schedule 1.

(2) Subsection (1) does not prevent a person who is hearing a submission or an appeal on a proposal from having regard to the matters stated in section 32.

(3) In this section, **proposal** means a proposed regional policy statement plan, or change for which—

(a) an evaluation report must be prepared under this Act; or

(b) a further evaluation must be undertaken under this Act.

Section 32A: inserted, on 1 August 2003, by section 11 of the Resource Management Amendment Act 2003 (2003 No 23).

Appendix 22 - Methodology used in developing the FDS

For the FDS sites, the FDS technical report FDS 2022 - 2052 | Tasman District Council provides the background on the analysis undertaken, in selecting both a spatial growth scenario and individual sites. For convenience, it is summarized here.

The methodology applied to develop the FDS comprised five broad stages, as set out below. Key stakeholder engagement, workshops with elected members and hui with ngā iwi took place during every stage:

- **Stage one** – opportunities and constraints mapping on a GIS viewer (available on above link) in order to identify potential growth areas and no-go areas. Baseline information was also reviewed from recent public consultations (eg LTP, Tasman Environment Plan) to develop a series of 11 FDS strategic outcomes (later rename objectives) and categories for the multi criteria analysis to be used for site assessments

- **Stage two** – information and data from stage one informed potential broad options for growth (spatial scenarios) and the multi criteria assessments for sites. The draft FDS objectives were refined and four initial broad options for growth (spatial scenarios) were evaluated against these objectives, focusing on potential capacity and advantages and disadvantages of each. Following a round of community engagement in October 2021, more than 200 potential growth areas across Nelson and Tasman were assessed, using over 20 different criteria

- **Stage three** – Once the site assessments were completed, draft growth plans for each area/town/city were prepared and the capacity provided under each growth area and scenario continued to be refined. High level development infrastructure requirements were assessed. Landowners of all preferred growth areas were contacted. A draft FDS for public consultation was developed

- **Stage four** – Public consultation using the Special Consultative Procedure under the Local Government Act of the statement of proposal and draft FDS. 568 submissions were received and four days of hearings took place where 120 submitters were heard. The FDS Subcommittee, comprising members of both Councils plus a ngā iwi representative deliberated on the draft FDS and made recommendations to the Nelson Tasman Joint Committee

- **Stage five** – the FDS was updated and refined following deliberations, including revising the preferred spatial scenario for adoption. The Nelson Tasman Joint Committee adopted the FDS on 29 August 2022,

Spatial scenarios considered in FDS

Spatial scenarios considered during preparation of the FDS are broad options for how Nelson and Tasman will grow to accommodate projected population increase. The options considered capacity, housing and business land choice, strategic infrastructure requirements (including transport) and their contribution to the eleven objectives of the FDS. The scenarios were shared with ngā iwi, stakeholders and elected members for feedback.

Together with the FDS objectives, the spatial scenarios assist in identifying and understanding trade-offs at a strategic level, as well as working out the distribution regionally of new growth areas. They also assist in identifying different housing and business types likely to be provided, as well as the spatial identification of opportunities and constraints.

The spatial scenarios focused on the urban environment in Tasman (and Nelson) as this is where most capacity is required to be found to meet demand. This is also the area to which the NPS-UD applies in Tasman. Growth opportunities for Tasman's rural environment were based on the individual demand profile of each area, rather than collective spatial scenarios for the whole rural environment, as those demands are unique to each town.

Initially four spatial scenarios were evaluated:

Scenario #1 intensification only focus

Intensification only focus – majority of growth to occur within the existing urban areas of Richmond, Stoke and Nelson, using maximum potential densities. Limited greenfield expansion (Richmond South, Saxton and Maitai) and small amount of rural residential expansion (along Coastal Tasman) to support housing choice.

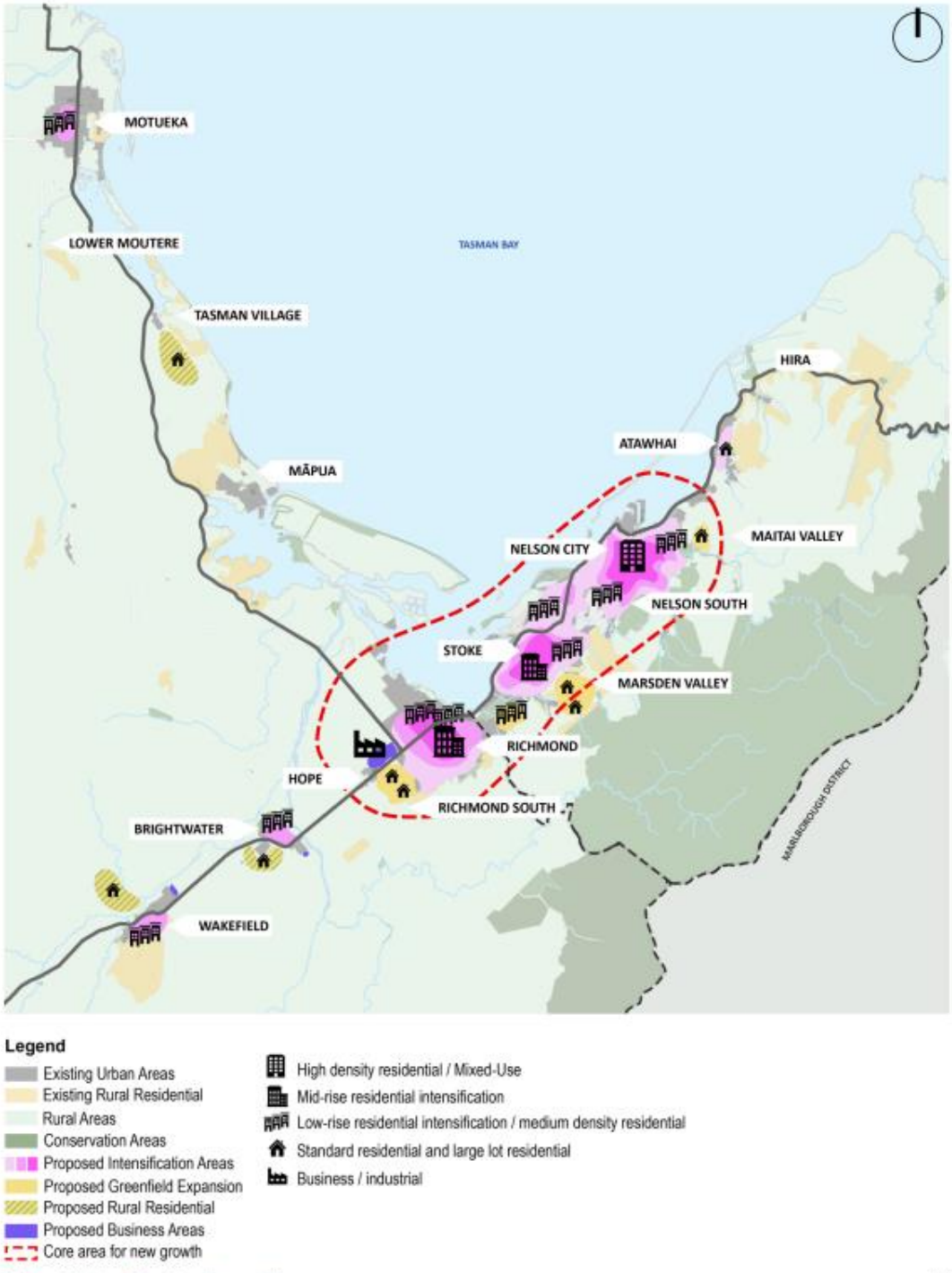

Figure 4 Intensification Focus Diagram

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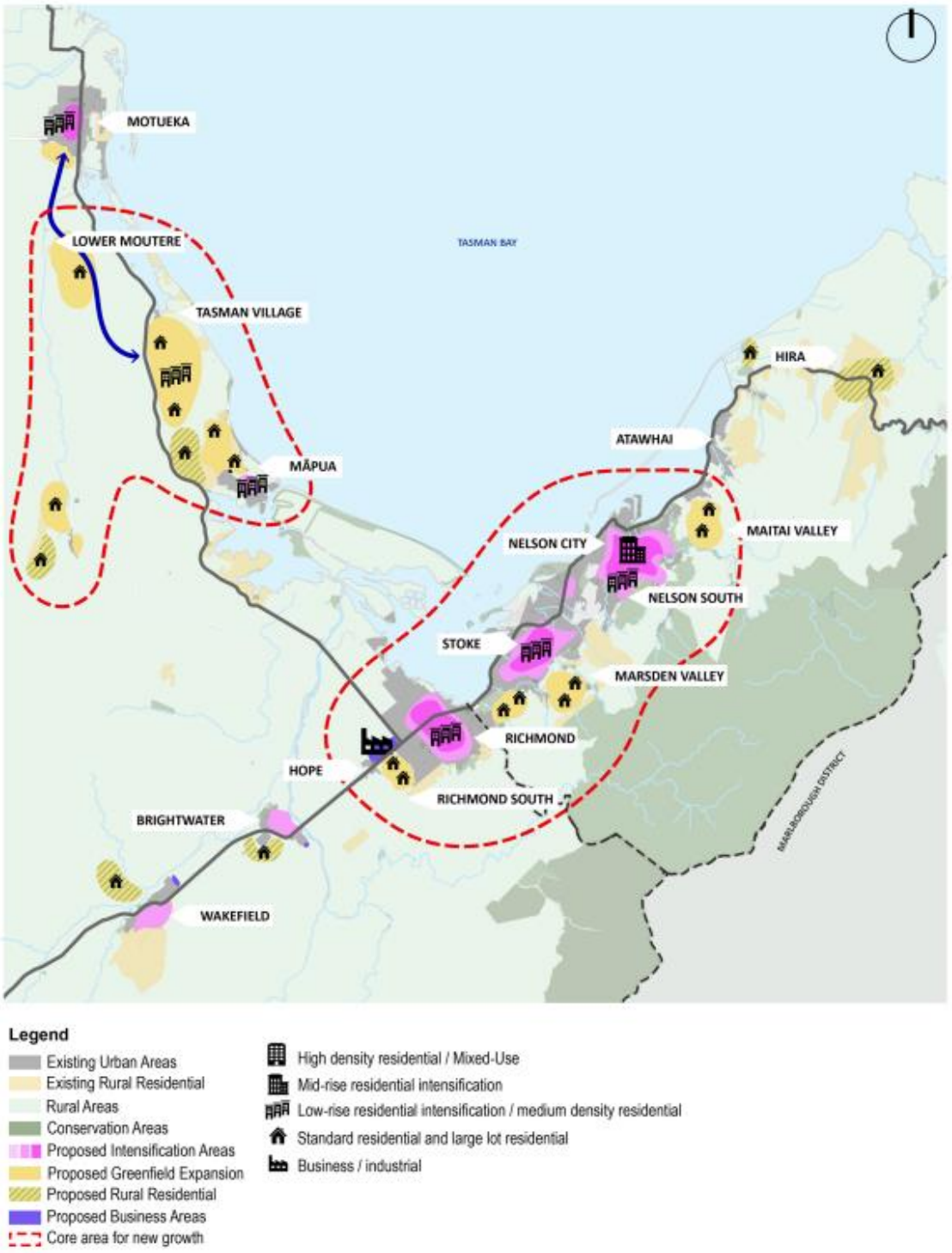
Scenario #2 Coastal Tasman focus

Coastal Tasman development focus – large proportion of growth in a new town near Tasman village. Some intensification in Nelson, Richmond and Stoke at modest densities and some greenfield expansion (Richmond South, Saxton, Maitai and Hira).



Scenario #3 State Highway 6 focus

State Highway 6 focus – greenfield expansion focused along State highway 6 between Wakefield and Hira, with a new community in Hira. Some intensification in Nelson, Richmond and Stoke at modest densities.

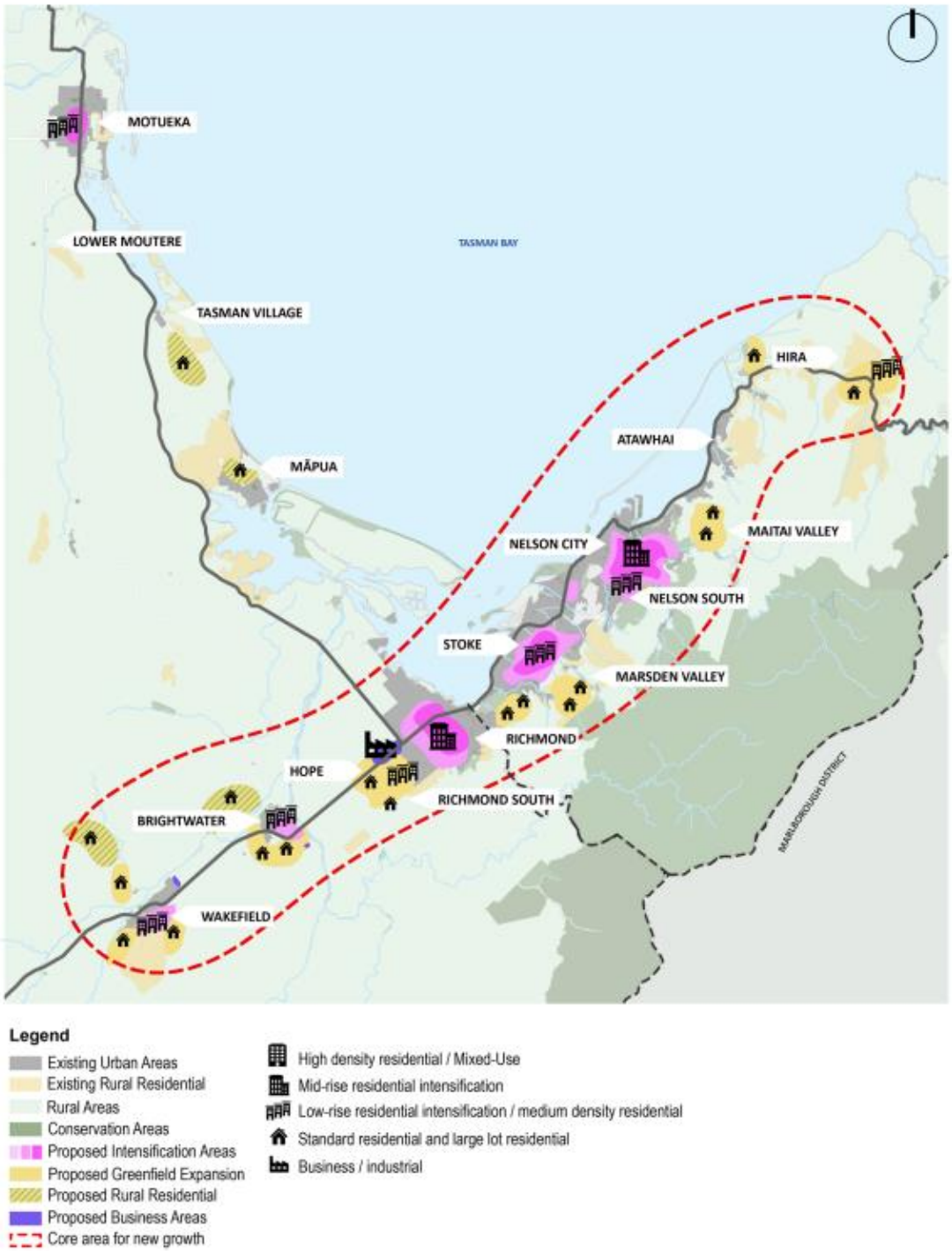


Figure 6 State Highway 6 Focus Diagram

Scenario #4 Hybrid scenario

Hybrid scenario – State highway 6 and Coastal Tasman development focus – greenfield expansion spread out evenly along the Highway corridor between Atawhai and Wakefield, as well as new communities at Hira and near Tasman village. Greenfield expansion (Saxton, Maitai and Marsden/Ngawhatu valleys) and modest densities of intensification in Richmond, Nelson and Stoke.

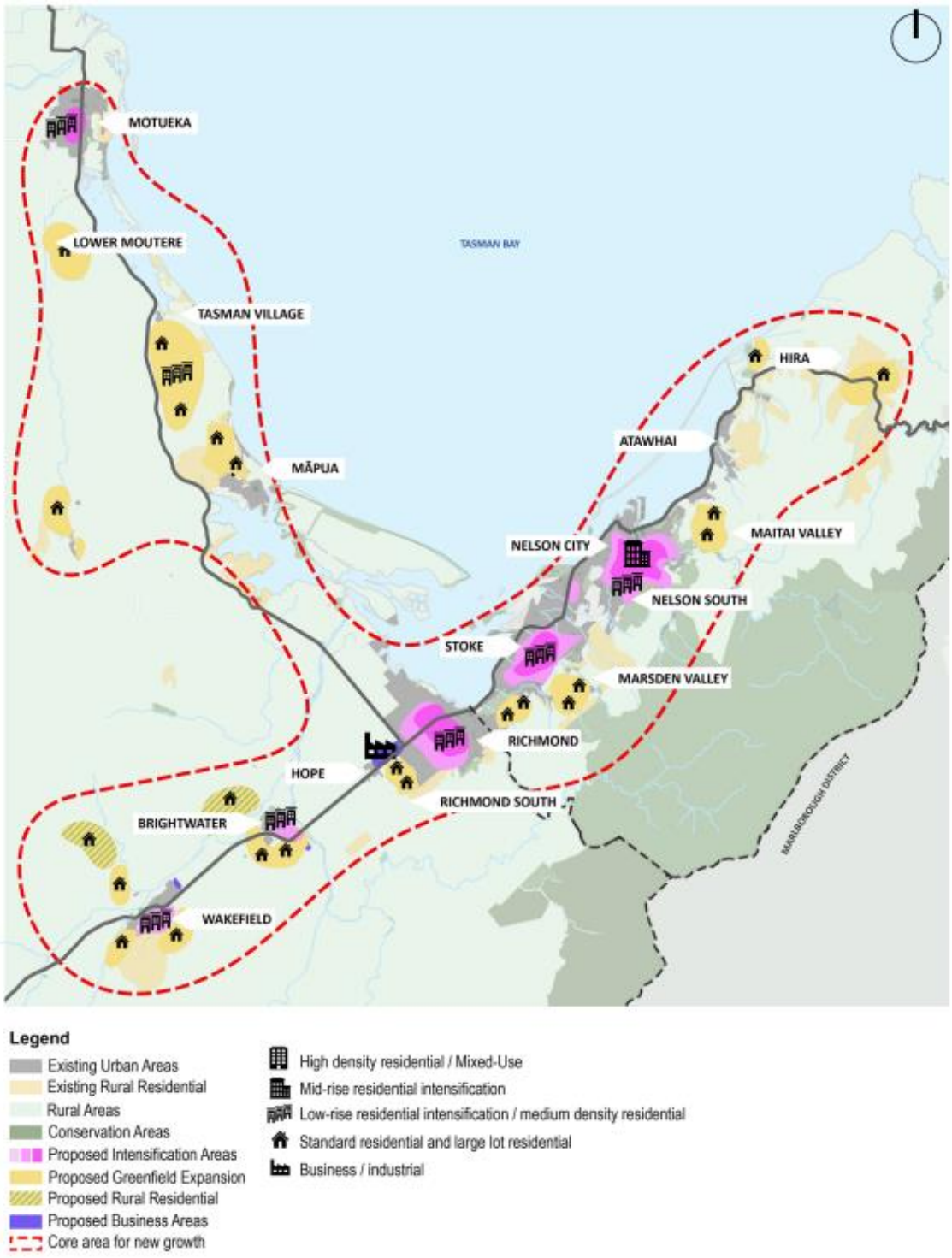


Figure 7 Hybrid State Highway 6 and Coastal Tasman Diagram

These scenarios helped inform an understanding of how potential development sites could contribute to the identified FDS objectives, one of which is meeting NPS-UD obligations on providing

sufficient capacity over the 30 year period. Full details on methodology used for estimating housing and business capacity of potential sites are provided in section 7.0 of the FDS technical report.

During the feedback stage, there was no unanimous preference for any one scenario but key themes did emerge such as maximizing intensification as well as providing sufficient greenfield opportunities if intensification is slow or below estimates.

When the four spatial scenarios were assessed against the FDS objectives, scenarios (i) (intensification focus) and (iii) (State highway 6 focus) were most aligned.

All scenarios were able to provide sufficient capacity to meet housing land demands under a medium growth scenario, but scenarios (i) (ii) and (iii) fell short of capacity requirements under a high growth scenario. Scenario (iv) was able to meet this through the development of two new communities at Tasman village and Hira, but performed the worst against the FDS objectives.

Based on this assessment the State High 6 focus scenario was selected for further refinement.

Scenario #5 Refined State Highway 6 focus
Refined State Highway 6 focus – greater level of intensification assumed similar to scenario #1 above, using maximum potential densities. Greenfield sites in Māpua and Motueka, increasing the density compared with the existing zone. 39% of residential capacity provided by intensification and balance from greenfield growth on sites from Hira to Wakefield along SH6, including a new community at Hira.

Additionally, business sites in Brightwater and Wakefield were included to provide for employment opportunities for the large numbers of new houses proposed in these towns. These locations included HPL and they were tested with community through consultation.

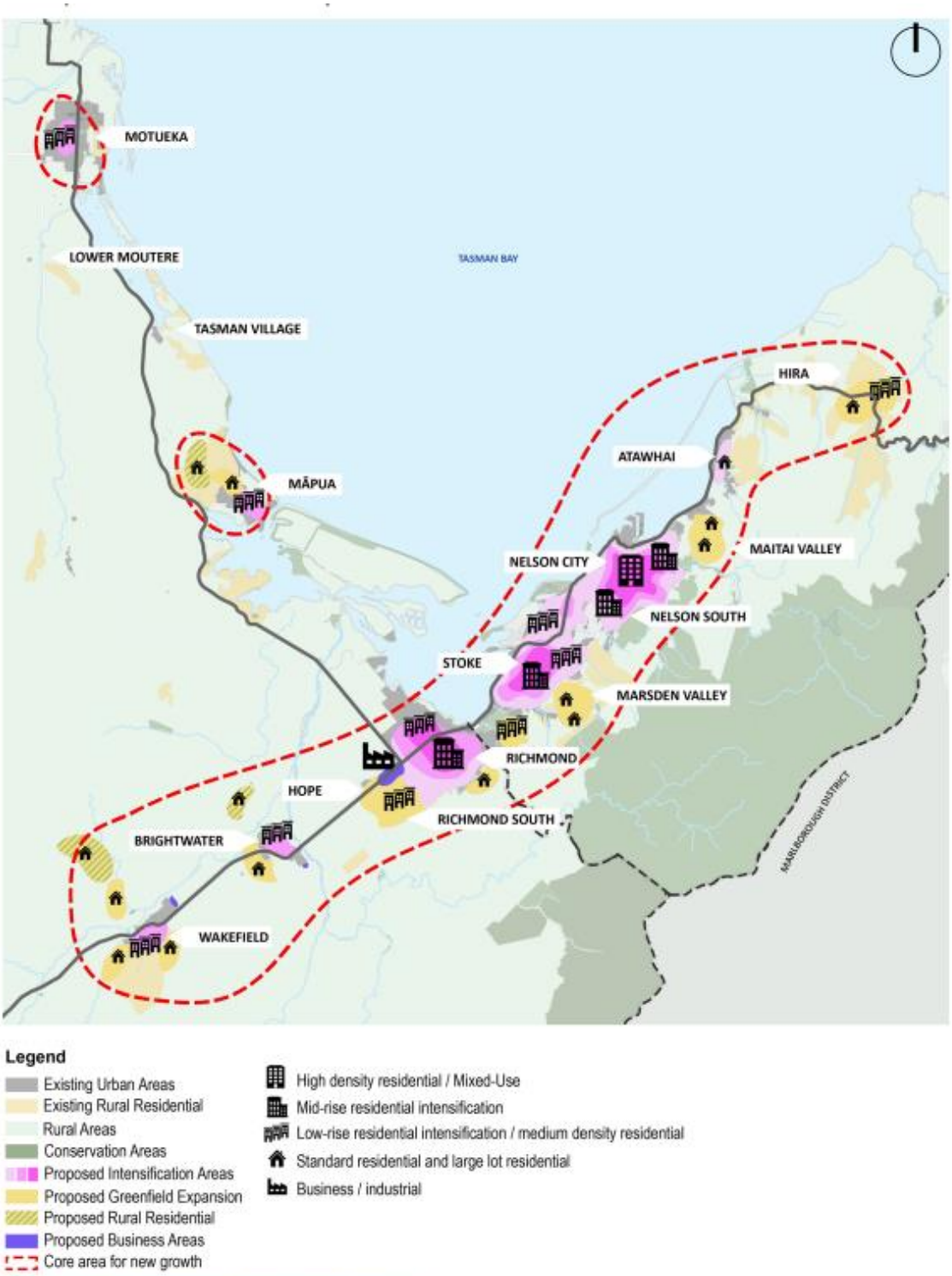


Figure 8 Refined State Highway 6 Focus Diagram

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Evaluation of the five different spatial scenarios

A high level evaluation of the five different spatial scenarios was completed, focussing on likely development capacity, accessibility, infrastructure requirements and "bottom line" constraints (cultural heritage sensitivities, highly productive land and natural hazards). Table 10 in the FDS technical report sets out the evaluation:

Table 10 Advantages and disadvantages of each spatial scenario

Scenario	Advantages	Disadvantages
#1: Intensification Focus	Meets capacity under medium growth scenario. Does not rely on urban growth into additional areas of highly productive land. Does not require large extensions to strategic trunk infrastructure. Urban form will better support a more efficient and frequent public transport system at a lower cost. Urban form will better support emissions reductions by locating new residents in close proximity to existing services.	Does not meet capacity under the high growth scenario. Relies on over 60% of growth being provided through intensification infill (this is an advantage and disadvantage but this level of intensification is considered a challenge in the short to medium term). Significant upgrades to existing infrastructure in the urban areas will be required. Dependant on development in urban areas with a known risk to flooding and coastal inundation.
#2: Coastal Tasman Focus	Meets capacity under medium growth scenario. Development near Tasman Village to form a new community of 3,200 houses would provide significant new housing capacity in Tasman. Provides for a variety of housing typologies in different locations. Includes significant areas of land around Tasman Village and Lower Moutere with willing landowners/developers.	Does not meet capacity under the high growth scenario. Requires the loss of some highly productive land in the Coastal Tasman Area (it is noted that the existing Rural Residential and Rural 3 zones already enable a degree of development in the area). Requires major extension of strategic trunk infrastructure from Motueka. Significant upgrades to existing infrastructure in the urban areas will still be required.

	Better responds to known demand for new housing along the coast and in proximity to Motueka. Early growth can leverage off planned public transport improvements between Māpua and Motueka. Development could help fund the construction of the new wastewater treatment plant for Motueka.	Inefficient urban form which may not support a reduction in GHG emissions. The creation of a new community in Tasman village is not currently supported by Te Ātiawa, who raised significant concerns over three sites. The nature of the concerns is a long history of spiritual/cultural issues associated with an area of battle and it being a very sensitive area.
#3 State Highway 6 Focus	Meets capacity under medium growth scenario. Provides for a variety of housing typologies in different locations. Requires only some capacity upgrades to existing strategic trunk infrastructure focussed around Wakefield and Brightwater. Early growth can leverage off planned public transport improvements between Wakefield and Richmond.	Does not meet capacity under the high growth scenario. Relies on a significant area of land (Hira) where there is no known willingness to develop a new community. Requires extension of strategic trunk infrastructure from Nelson to Hira. Significant upgrades to existing infrastructure in the urban areas will still be required. More difficult to run an efficient and frequent public transport system along an extended corridor. Large scale growth around Wakefield and Brightwater will still encourage an increase in GHG emissions without significant further investment in public transport. Requires the extension/ creation of new dedicated public transport routes to serve Hira. Modest known demand for living in 'Nelson Rural' according to the Housing Preferences Survey 2021 Some fragmentation of landownership (including rural residential development) may make full-build out of Hira more challenging.

#4: Hybrid State Highway 6 and Coastal Tasman Focus	Meets capacity under medium and high growth scenario. Provides for the greatest variety of housing typologies in different locations. Includes significant areas of land around Tasman Village and Lower Moutere with willing landowners/developers. Development could help fund the construction of the new wastewater treatment plant at Motueka. Early growth can leverage off planned public transport improvements between Wakefield/ Motueka and Richmond.	Does not meet capacity under the high growth scenario. Dilution of growth areas makes servicing more expensive with new strategic trunk infrastructure, social infrastructure (e.g. schools) and public transport required to both Tasman Village and Hira. Dilution of growth areas may not support growth and intensification of existing commercial centres. Will not support a reduction in GHG emissions without significant upfront investment in new public transport and cycling connections to Nelson. The creation of a new community in Tasman village is not currently supported by Te Ātiawa, who raised significant concerns over three sites. The nature of the concerns is a long history of spiritual/cultural issues associated with an area of battle and it being a very sensitive area.

#5: Refined State Highway 6 Focus	Meets capacity under medium and high growth scenario. Provides for a variety of housing typologies in different locations. Requires only some capacity upgrades to existing strategic trunk infrastructure focussed around Wakefield and Brightwater. Early growth can leverage of planned public transport improvements between Wakefield and Richmond.	Relies on a new community at Hira as well as large greenfield growth areas in Brightwater and Wakefield to meet capacity under the high growth scenario. There is uncertainty of landowners' and the community's willingness for large sale development in these areas. Does not respond as well to known demand for new housing along the coast and in proximity to Motueka. Significant upgrades to existing infrastructure in the urban areas will still be required. A less efficient urban form (with significant growth concentrated around Hira, Brightwater and Wakefield) which may not support a reduction in GHG emissions.

Scenarios #6 and #7 developed for public consultation: Consolidated State Highway 6 focus and Consolidated SH6 focus with new communities

Following this evaluation a sixth spatial scenario was developed for public consultation with elected members, which comprised a consolidated version of the State Highway 6 refined scenario #5 above, without a new community a Hira. The main focus of future development would be concentrated between Atawhai and Wakefield and maximum potential densities of intensification in Nelson, with moderate intensification densities in Tasman. Under this scenario, growth provided for via intensification increased to around 48%, development of existing zoned areas 8% and development of greenfield sites 44%. The increased levels of intensification meant the new community at Hira or near Tasman village were no longer needed. This sixth spatial scenario was the core growth scenario.

Some concerns were raised by elected members over the ability of the proposed intensification to be realised, so a seventh spatial scenario was developed for consultation, comprising a new community near Tasman village. As set out in the evaluation table above (table 10 from the FDS technical report), there are a number of advantages and disadvantages with development near Tasman village, but it did offer a potential solution to providing a large number of dwellings to meet demand and was proposed as a secondary part of the consultation proposal:

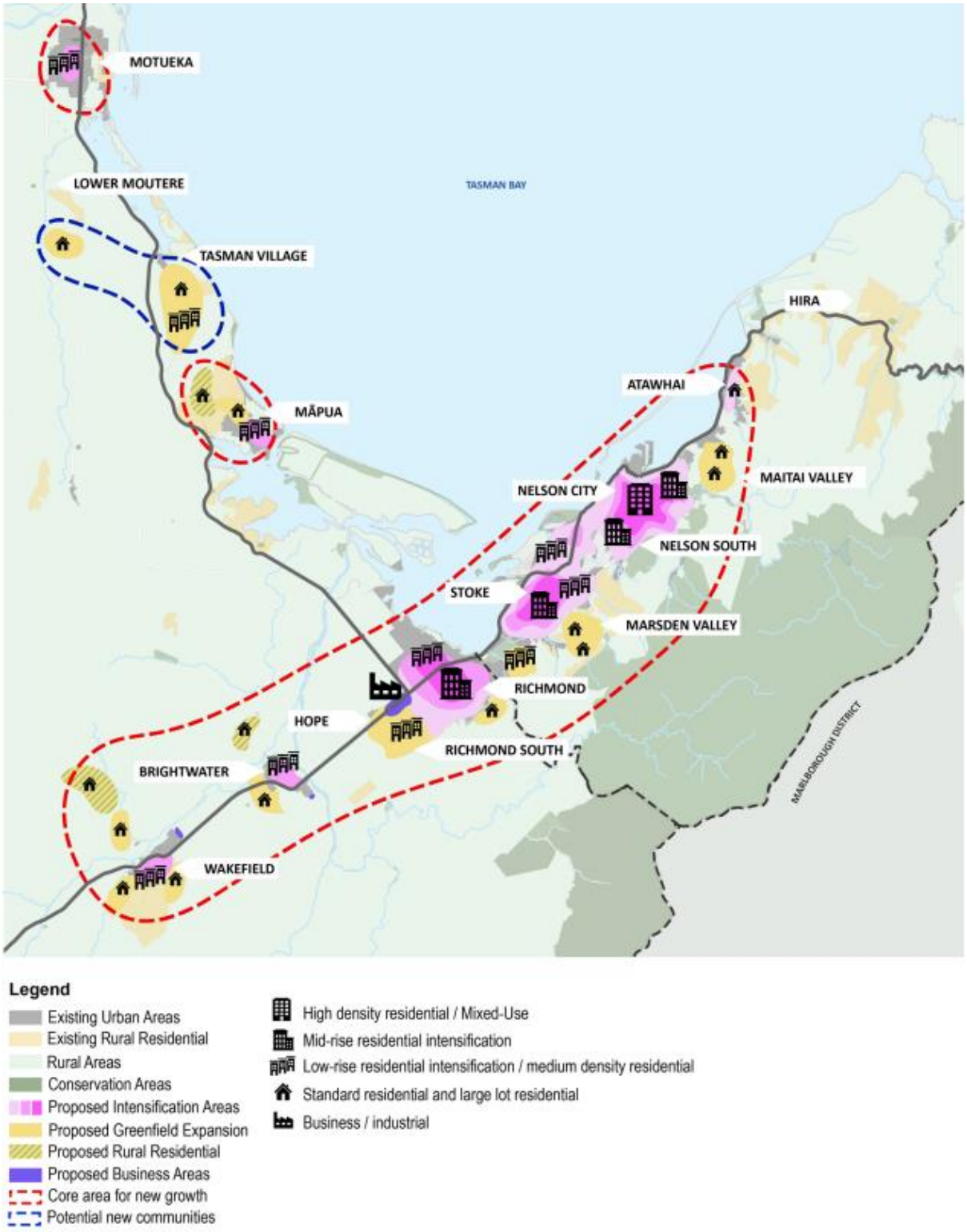

Figure 9 The proposal for consultation including a potential new community near Tasman Village

The evaluation of Scenario #6 (core proposal) follows:

Table 11 Advantages and disadvantages of the core proposal

Scenario	Advantages	Disadvantages
#6 Preferred Growth Scenario **Consolidated growth focussed along State Highway 6 and meeting demands of Tasman rural towns**	Meets demand under both medium and high growth scenarios. Provides for a variety of housing typologies in different locations. Requires only some capacity upgrades to existing strategic trunk infrastructure focussed around Wakefield and Brightwater. Early growth can leverage off planned public transport improvements between Wakefield and Richmond. Is not dependant on development in urban areas with a known risk to flooding and coastal inundation. This proposal excludes the need to develop on greenfield sites subject to significant natural hazard risk (e.g. coastal inundation) or which may have significant impacts on freshwater bodies. This proposal largely excludes the need to develop on greenfield sites containing highly productive land sites. Exceptions to this include two small areas for light industrial uses in Brightwater and Wakefield adjacent to existing industrial areas. This proposal excludes sites with significant cultural values. The proposal aligns well with the identified outcomes of the FDS.	Relies on over 50% of growth being provided through intensification within the existing urban area. There is uncertainty over the rate at which the local development market will take up intensification opportunities. No new significant growth areas provided for within, or in proximity to, Motueka where there is known demand for new housing. Significant upgrades to existing infrastructure in the urban areas will still be required. Would likely require further investment in public transport frequency across the existing urban area and south to Brightwater/ Wakefield.

Evaluation of scenario #7 (secondary part of the proposal for consultation) follows:

Table 12 Advantages and disadvantages of the secondary part of the proposal in the draft FDS including a potential new community near Tasman Village

Sub-scenario	Advantages	Disadvantages
#7 Preferred Growth Scenario including a potential new community near Tasman Village	Significantly exceeds housing demand under both medium and high growth scenarios. Development near Tasman Village to form a new community of 3,200 houses would provide significant new housing capacity in Tasman. A new community near Tasman Village would support the development of some local services (e.g. shops, employment) that could support the local population. Provides for a variety of housing typologies in different locations and provides future resilient options in proximity to Motueka. Early growth near Tasman Village can leverage off planned public transport improvements between Māpua and Motueka and improves the viability of the service in the longer-term. Development near Tasman Village could help fund the construction of the new wastewater treatment plant for Motueka. This proposal excludes the need to develop on greenfield sites subject to significant natural hazard risk (e.g. coastal inundation) or which may have significant impacts on freshwater bodies. Development near Tasman Village is relatively unconstrained, with known issues (e.g. fault line, flooding) that can be easily addressed through detailed design of future subdivision. The majority of the landholdings near Tasman Village are under a small handful of owners, some of which	Requires significant loss of some highly productive land in the Coastal Tasman Area – large titles not fragmented, relatively flat and where surrounding use is horticulture. However, it is noted that the existing Rural Residential and Rural 3 zones already enable a degree of development in this area. The creation of a new community in Tasman village is not currently supported by Te Ātiawa, who raised significant concerns over three sites. The nature of the concerns is a long history of spiritual/cultural issues associated with an area of battle and it being a very sensitive area. Dilution of growth areas makes servicing more expensive with new strategic trunk infrastructure required for Coastal Tasman, via extension of services from Motueka. This could compromise on the ability to deliver infrastructure upgrades required to support intensification.

	have expressed a strong willingness to develop in the area. The potential capacity released by a new community near Tasman Village provides opportunities to refine or reduce the extent of greenfield expansion proposals to the south along SH6 in towns like Wakefield and Brightwater.

Comparative evaluation of all seven spatial scenarios against draft FDS objectives

Figure 10 in the FDS technical document provides a simple evaluation of how the spatial scenarios were considered to meet the 11 FDS objectives. Green indicates that the scenario aligns with the objective, orange indicates that the scenario partially meets the objective and red shows that there is misalignment with the FDS objectives.

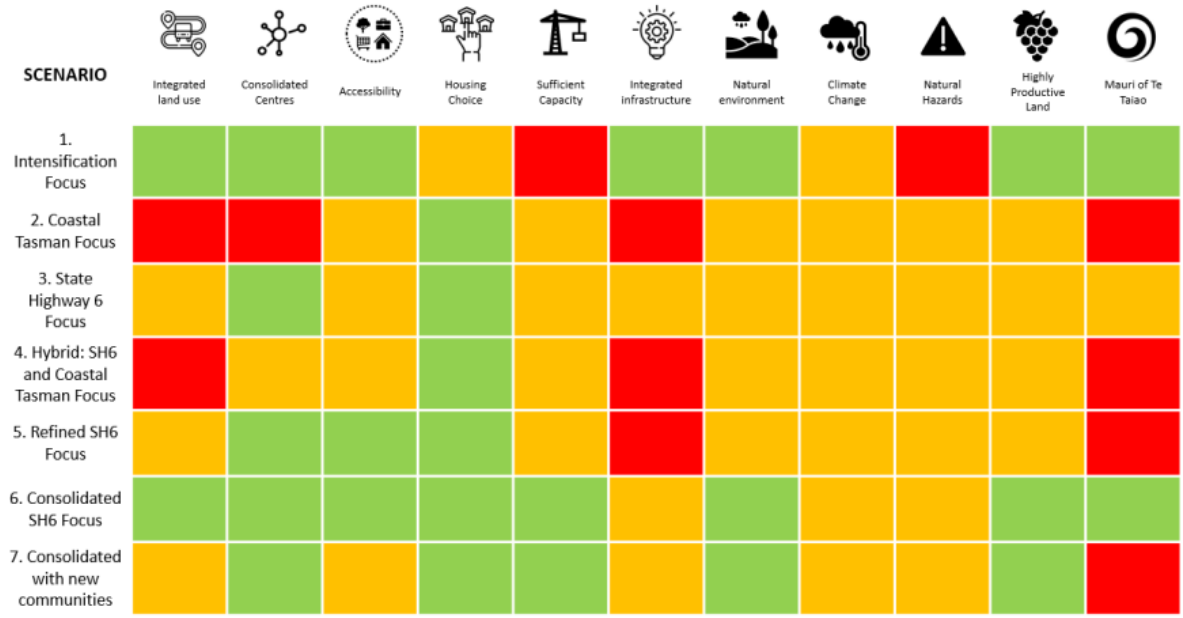

Figure 10 Evaluation of Scenarios against the draft FDS Objectives

Other broad growth scenarios considered by FDS

In addition to the seven spatial scenarios detailed above, a number of other growth scenarios were also considered, but discounted early in the process. These included:

- Richmond expansion including west and east of SH60, discounted due to highly productive land constraints and the importance of that land to the economy
- Further expansion of Brightwater, including south of SH6. Discounted due to highly productive land constraints and flood risk from the Wairoa and Wai-iti rivers
- Significant expansion of Motueka, discounted due to risk from natural hazards (mainly coastal and river inundation), significant areas of highly productive land and cultural heritage significance all around the town

- Expansion of Lower Moutere – progression of a large site from the 2019 adopted FDS (site T-18) for a new community. Discounted due to earlier strong opposition from landowners following its adoption in the 2019 FDS
- Status quo (2019 FDS), with no change from those adopted growth areas. This was discounted as that FDS was responding to lower levels of growth than were being forecast in 2022.

Final FDS spatial scenario following public consultation

Based on the submissions received on the draft FDS during the Special Consultative Procedure, changes were made to the preferred scenario #6 (consolidated SH6 focus). Key changes included concentration of greater levels of development in and around Nelson and Richmond at Saxton and Orphanage West (+1,400 dwellings) and a corresponding drop in capacity in surrounding towns including Brightwater (-270 dwellings), Māpua and notably Wakefield (-1,600 dwellings). Full details of other changes can be found on pages 83-84 of the FDS technical document.

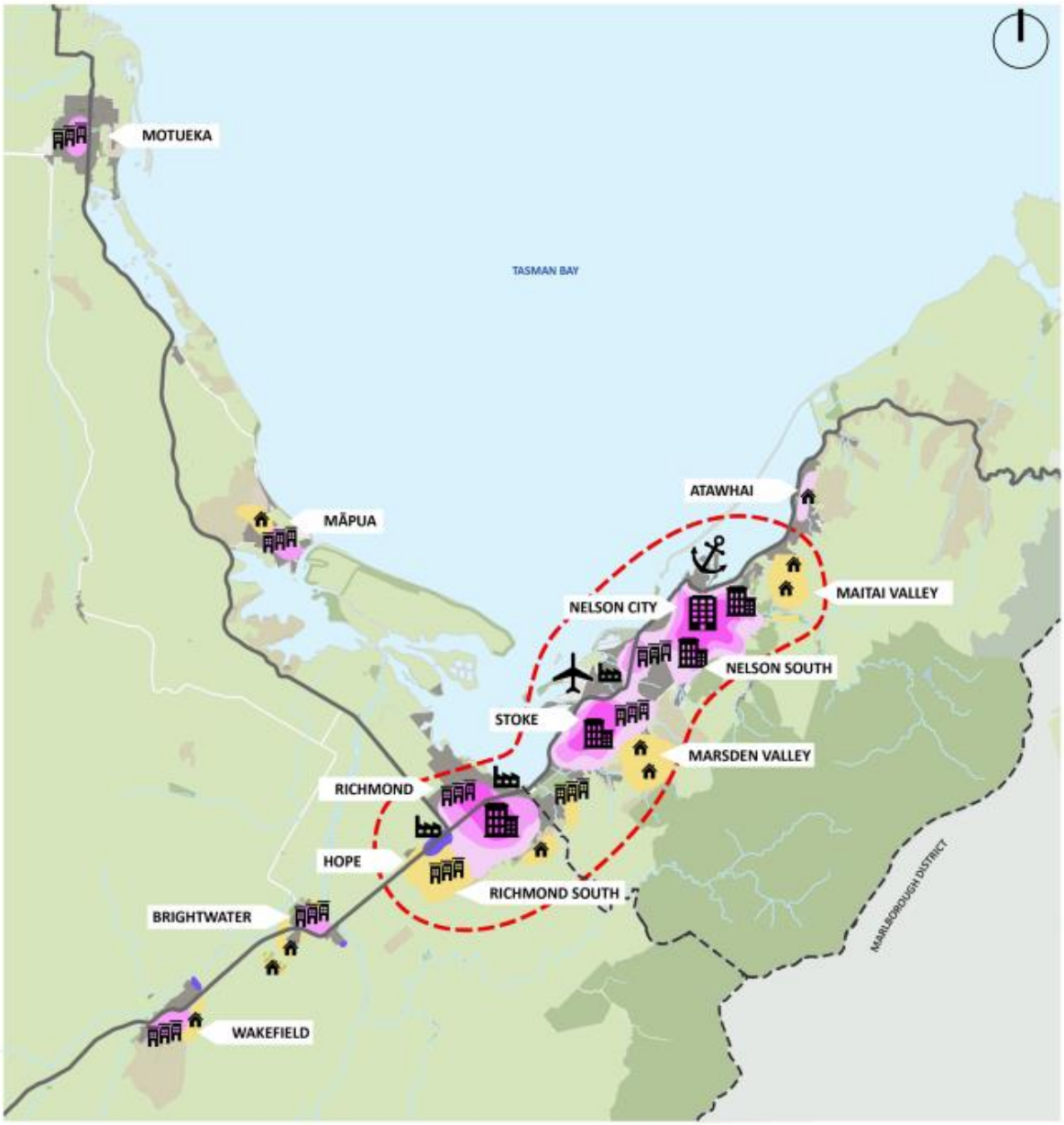

Figure 11 Final strategy

Potential development sites

A total of 189 sites were initially assessed for the draft FDS, 148 of which fell within Tasman and 41 within Nelson. The sources for the sites were:

- Sites previously identified and assessed as part of the 2019 FDS
- Workshops with developers and businesses
- Ngā iwi discussions

- Stakeholder workshops
- Site nominations from the community during engagement on the FDS
- Historical sites previously discussed with the Councils
- Sites from earlier strategies and plans

All sites were assessed against 21 different assessment criteria (using a multi criteria analysis tool) which ranged from general accessibility by all forms of transport, land fragmentation/capacity to deliver, efficiency of supporting infrastructure, to impact on highly productive land, freshwater bodies and significant natural/ecological areas. A full list of the criteria is provided in Appendix 4 of the FDS technical report here 33547.

A further 33 sites were proposed through submissions in Tasman and these were evaluated using the same 21 assessment criteria as the initial 189 sites.

After assessment each site was allocated to various spatial scenarios based on their geographic location e.g. sites near Tasman village were included within the Coastal Tasman focus scenario. Due to the refined final spatial scenario #6 not meeting the required capacity numbers, based on potential yields of sites, it was necessary to include some of the more poorly performing sites, where they were aligned with the overall spatial strategy i.e. focusing the majority of growth along the State Highway 6 corridor.

In Tasman's rural environment, better performing sites under the multi criteria assessment were selected in preference to lower scoring sites, where there were other options available.

Any new sites or amended FDS site boundaries, proposed as part of PC81, were all assessed against the same 21 criteria as the original FDS sites. Appendix 8 provides consultant Barker's review of this process in a manner consistent with the development of the FDS and its overall strategy for future urban growth as it relates to Tasman.

Business future development sites

There were a number of common elements and assumptions on business land capacity which applied to all spatial scenarios considered. These included:

- Intensification of existing commercial areas in Nelson could provide for its future commercial requirements
- provision for business activities (commercial and light industrial) in the new growth area at Richmond South
- provision for smaller scale commercial and business activities at various towns in Tasman e.g. Brightwater, Wakefield, Murchison, allowing for expansion of existing commercial areas or reflecting where existing uses have emerged irrespective of the underlying zoning
- additional light industrial sites identified for Brightwater and Wakefield on the fringes of existing business areas, despite containing highly productive land. This was necessary to provide business capacity in the future to support the large numbers of new homes identified in these towns
- mixed use development in Nelson's and Richmond's highest density residential areas (ground floor use being retail/commercial)

For the FDS sites, the FDS technical report FDS 2022 - 2052 | Tasman District Council provides the background on the analysis undertaken, in selecting both a spatial growth scenario and individual sites. For convenience, it is summarized here.

Appendix 23 - Summary of PC81 by chapter of the TRMP

Tasman Resource Management Plan Provision	Proposed amendment
Volume 1: Text Part I – Introductory	
Chapter 2 Meanings of words	• new definition of bedroom in the proposed MDRZ • amendment to the Brightwater Development Area definition to include a site in PC81 • delete Intensive Development definition and replace with amendments to the Comprehensive Development definition to reflect new MDRZ • new definition for green roof • new definition of "habitable room" in order to implement noise mitigation measures for dwellings in the medium density zone adjacent to busy roads. • amended definition of impervious surface to provide updated general definition and list of specific examples of impervious surfaces • new definition of loading area • amendment to medium density development definition, removing the average site size and enabling medium density to comprise greater than 20 dwellings per hectare • new definition on micromobility transport modes • new definition of net density in terms of numbers of lots or household units per hectare • A new definition for "pervious surface" (permeable surface) is introduced to assist with defining site coverage. • amendment to definition of site coverage. The definition of site coverage is amended so that it now means the proportion of a site that is covered by impervious surfaces. • new definition of small unstaffed network utility buildings • amended definition for workers' accommodation to reflect modern day requirements
Volume 1: Text Part II: Land	
Chapter 5 Site Amenity Effects Section 5.2 Amenity values	Amendment to exiting objective 5.2.2 to recognise that amenity values in areas planned for intensification develop and change over time. Amendment to existing policy 5.2.3.1 on privacy and amenity to recognize that amenity may develop and change over time with medium density.

	Amendment to existing policy 5.2.3.2 on daylight and sunlight to recognize that sunlight admittance may decline with medium density. Amendment to existing policy 5.2.3.3 concerning outdoor living, to recognize that space for outdoor living may reduce with medium density. New policy (5.2.3.8A) relating to road noise effects in relation to MDRZ Consequential amendments to 'associated methods of implementation', referencing the proposed medium density residential design matrix (new Schedule 17.1AA) as well as increased tree cover in public land areas of the MDRZ. Amended reference to works and services in relation to landscape planting, updating to reference tree cover within street corridors and public land in MDRZ New text in 'principal reasons and explanation' on the NPS-UD and how it acknowledges that amenity values develop in urban environments, as well as the proposed MDRZ.
Section 5.3 Visual and Aesthetic Character	Amendment to existing policy 5.3.3.1 to introduce the proposed MDRZ within existing urban areas. Amendment to 'associated methods of implementation' referencing the proposed medium density residential design matrix (new Schedule 17.1AA). Amendment to 'principal reasons and explanation' to explain how enabling increased and varied housing densities in specified development areas reflects the need to use land more efficiently, where expansion does occur.
Section 5.4 Residential Activities and Community Facilities	Amendment to the section 5.4 heading deleting 'residential activities' so it just refers to community facilities. Similar amendments to issue 5.4.1. Amendment to objective 5.4.2 to remove reference to residential activities Relocation of existing policy 5.4.3.1 referring to housing types to Chapter 6.4. Amendment to existing policy 5.4.3.2 referring to the urban areas and the urban environment instead of residential areas. Proposed relocation of existing 'methods of implementation' 5.4.20.1 (a) to chapter 6.4A.20, concerning residential activities. Proposed relocation of existing 'principal reasons and explanation' 5.4.30 on variety of housing forms to chapter 6.4A.30.
Chapter 6 Urban Environment Effects Section 6.1 Sustainable Urban Design and Development	Amendment to objective 6.1.2.1 to reference well-functioning urban environments

	Amendment to policy 6.1.3.1, relocating two criteria within the policy on medium density housing development to new section 6.4A3.2
	Relocation of existing policy 6.1.3.1A on medium density housing in the development areas to section 6.4A with some minor amendments and inclusion of (j) referencing comprehensive development and outline spatial plan requirements
Section 6.2 Land Effects from Urban Growth	Amendment to policy 6.2.3.2A to enable medium density residential development in the proposed MDRZ.
	Removal of Policy 6.2.3.2B and relocation of existing policy 6.2.3.2C on the Wakefield Development Area to section 6.17.
	Relocation of existing policies 6.2.3.8 and 6.2.3.9 on Tākaka Eastern Golden Bay Area to section 6.11 and 6.10 respectively
	Relocation of existing policy 6.2.3.10 on Richmond West Development Area to section 6.8.
	Consequential amendments to 'methods of implementation' – addition of the medium density housing design matrix (new Schedule 17.1AA) and associated amendments to principal reasons and explanation.
Section 6.3 Urban Infrastructure Services	New objective 6.3.2.3 recognising development within deferred zones and appropriate sequencing.
	New policies 6.3.3.1A, 6.3.3.1B and 6.3.3.1C recognising residential intensification and infrastructure upgrades may not be programmed or maybe programmed beyond year 10. Policies recognising avoiding additional load or pressure on infrastructure.
	Amendments to policy 6.3.3.4 to include well-functioning urban environments.
	New policy 6.3.3.4AA referencing Schedule 17.14A and deferred zoned land
	Amendments to policies 6.3.3.4A to include reference to rural residential land and deferred zoning
	Amendments to policy 6.3.3.4B with regards to deferral wording
	New policy 6.3.3.4D with respect of deferred zoning and requirements
	New policy 6.3.3.5A to promote well-connected and efficient road and active transport networks through OSPs and indicative roads, reserves and walkways
	Amended regulatory methods to include references to OSPs and indicative features and amendments to the principal reasons and explanation
Section 6.4 Coastal Urban Development	Relocation of existing policy 6.4.3.4 on Tākaka Eastern Golden Bay to section 6.11

Proposed new section 6.4A on Land for Residential Activities	Insertion of new section 6.4A land for residential activities (issue, objectives and policies): • new issue 6.4A.1.1 on the provision and availability of suitably located housing land capacity within the shared tier 2 urban environment to meet Tasman District and Nelson City's needs, over the long term • new objective 6.4A.2.1 on accommodating a wide range of residential activities in urban areas • new objective 6.4A.2.2 on intensification, responding to housing needs, demand and the town's planned urban built character while incorporating density and quality urban design outcomes • policies 6.4A.3.1-4 operative relocated from elsewhere in Chapters 5 and 6 with minor amendments • new policies 6.4A.3.5 – 17 for MDRZ • revised methods of implementation • revised reasons and explanation
Section 6.5 Land for Industrial Activities	Minor amendments to issue 6.5.1.2 New policy 6.5.3.1A on providing a supply of suitable land for regional and district industrial needs for the medium to long term (2054). (Note there is an existing objective 6.5.2.2 on a supply of suitably located industrial land to provide for the medium to long term).
Section 6.6 Land for Commercial Activities	New issue 6.6.1.4 on growth and the potential risk to town centres' health from sprawling or ad hoc commercial developments. Acknowledgement of the role and function of Tasman's centres. New objective 6.6.2.3 on a supply of suitably located commercial land to provide for regional and district needs for the medium to long term. New objective 6.6.2.4 on an established hierarchy of existing commercial centres. Insertion of relocated existing policy 6.6.3.7 to earlier policy 6.6.3.1 on providing a supply of suitable land for regional and district commercial needs for the medium and long term. Minor amendments to existing policy 6.6.3.2 about retaining a compact identifiable grouping of commercial activities in urban and rural centres. New policy 6.6.3.3 and Table 16.6A on establishing a hierarchy for existing commercial centres in the district, with an accompanying table that identifies each centre in the region, its role, function and commercial zone hierarchy. The role of each centre is based on the National Planning Standards 2019 Zone names. Richmond, a metropolitan centre also includes five neighbourhood centres.

New policy 6.6.3.4 on realizing efficiencies relating to maintenance, upgrade and extension of network infrastructure through the proposed hierarchy.

New policy 6.6.3.5 and amendment to existing policy 6.6.3.2 (new 6.6.3.6) on ensuring that the Metropolitan Centre for Tasman District, Richmond continues to provide for a broad range of activities and is the primary urban centre in the district; and that Richmond, Motueka and Tākaka continue as the central focus for pedestrian oriented retail and office commercial development in the district.

Minor amendment to policy 6.6.3.6 to include Motueka and Takaka town centres

New policies 6.6.3.7 and 6.6.3.8 on the roles of local centres and neighbourhood centres.

New policy 6.6.3.9 enabling commercial activities in locations very near to Council reserves and open spaces, where the activity is not inappropriate in a residential environment.

New policy 6.6.3.10 on enabling limited commercial activities in the proposed MDRZ where those activities contribute to the vibrancy of the area and are not inappropriate in a residential environment.

Amendment to existing policy 6.6.3.13 to include the Motueka Central Business Zone - so that business growth in the Mixed Business Zone is complementary to the Richmond and Motueka Central Business Zones.

Amended policy 6.6.3.15 relating to Mixed Business Zone development to ensure on-going viability of central business zone locations.

Minor amendment to policy 6.6.3.17.

Relocation of existing policy 6.6.3.7 on providing a supply of suitable business land to earlier in the same section (6.6.3.1)

New policy 6.6.3.21 to avoid smaller format retail in Mixed Business Zone locations, ensuring the integrity of Richmond and Motueka town centres

'Tourist activities in rural areas' - Relocation of existing policy on Tākaka and Eastern Golden Bay's commercial centres to later in the same section at 6.11.3.1C.

'Tourist activities in rural areas' - Insertion of relocated policies from section 6.7 on design of shopping centres and their development that suits the character of their environment to new policy locations 6.6.3.24 and 6.6.3.25.

Consequential amendments to 'methods of implementation' 6.6.20.1.

Consequential amendments to 'principal reasons and explanation' at 6.6.30 on Tasman's commercial centres.

Section 6.7 Settlement Character and Design	Change title of this section to 'Urban and Rural Centre character, design and development'. Throughout the issues, objectives, policies, methods of implementation, principal reasons and explanation and performance monitoring indicators amendments comprising deletion of the word 'settlement' and its replacement with 'urban and rural centre or centre'.
Section 6.8 Richmond	Minor updates to existing issue 6.8.1.5 referring to Richmond as a Metropolitan Centre and the role it plays in the District and issue 6.8.1.6 recognising the role of the MDRZ in Richmond. Similar updates to policy 6.8.3.10 introducing the proposed MDRZ, consistent with proposed changes to earlier sections. Insertion of relocated policy 6.2.3.10 on Richmond West Development Area to section 6.8, forming new policy 6.8.3.13A, within the Richmond section. New policies 6.8.3.13B, 6.8.3.13C, 6.8.3.13D and 6.8.3.13E on commercial activities in Richmond, ensuring that the Richmond Metropolitan Centre prevails as the primary urban centre in the area and is not undermined as the central focus by activities located in the Richmond West Mixed Business Zone or Richmond neighbourhood centres. Also that Richmond's CBD continues to develop as the central focus for pedestrian oriented intensive retail and office commercial development, that neighbourhood centres in Richmond provide predominantly for small scale commercial and community activities. Removal of policy 6.8.3.15 around large format retail. Amendments to existing policy 6.8.3.24 'open space and reserve network' updating aspirations with recent community infrastructure in the Richmond area. New policies 6.8.3.24A and 6.8.3.24B concerning the prioritising of new neighbourhood reserves of varying formats in areas of Richmond identified as underprovided for open space, particularly in the intensification area. New policy 6.8.3.25A on stormwater management infrastructure to ensure stormwater does not cause flooding in the MDRZ. Amendment to 6.8.3.27 to reference MDRZ as well as Residential Zone in reference to community activities and facilities Amendments to 6.8.2.27B to add reference to MDRZ and comprehensive development. Delete existing policy 6.8.3.27C New policy 6.8.3.27D on increasing extent of tree cover on public land in the MDRZ in Richmond. New policy 6.8.3.27E on enabling taller buildings in Richmond Metropolitan Center, incorporating residential opportunities above the ground floor.

	Consequential amendments to 'methods of implementation', 'principal reasons and explanation' and updating of figure 6.8A (including map) on residential housing choices in Richmond to include the MDRZ.
Section 6.9 Motueka	New issue 6.9.1.1B on need to provide a variety of medium density housing options in Motueka. New policy 6.9.3.3B on providing for denser housing in the MDRZ in Motueka. New policy 6.9.3.6A on enabling taller buildings in Motueka's commercial and central business zones, incorporating residential opportunities above the ground floor. Consequential amendments to 'methods of implementation', 'principal reasons and explanation.'
Section 6.10 Tākaka	New issue 6.10.1.5 on the need to provide a greater variety of dwelling sizes in and around Tākaka. New policy 6.10.3.1A relocated from 6.2.3.9 New policy 6.10.3.1B on providing medium density housing options and a variety of dwellings sizes in the MDRZ at Rototai Road. Amended policy 6.10.3.3 to enable residential activities in the Commercial Zone in Motupipi Street where flood risks are addressed Consequential amendments to methods of implementation' and 'principal reasons and explanation.'
Section 6.11 Tākaka-Eastern Golden Bay	Insertion of relocated operative policies from existing locations 6.2.3.8, 6.4.3, 6.6.3.10 to 6.11.3.1A, 6.11.3.1B, 6.11.3.1C on Tākaka-Eastern Golden Bay. Amendment of relocated policy 6.11.3.1C ensuring that Tākaka's Central Business Zone continues to develop as the main hub for commercial and service activities and that the local centres of Collingwood and Pōhara service the needs of the residential catchment. Consequential amendments to 'principal reasons and explanation' including relocated text from 6.2.30 and 6.3.30.
Section 6.13 Settlements in or adjoining National Parks	Change to the title of the section, deleting 'settlements' and replacing with 'Urban and Rural Centres.' Same amendment as above to issues section 6.13.1. Insertion of relocated policy 6.3.3.3 to new policy 6.13.3.1A on Marahau and a reticulated system for water and wastewater. Amendment to existing policy 6.13.3.3 introducing NZ standards on parking facilities. 'Principal reasons and explanation' - insertion of relocated text on Marahau's tourist services zoning from location 6.3.30.
Section 6.15 Māpua /Ruby Bay	New issues statements 6.15.1.3A and 6.15.1.3B acknowledging need to contribute to achieve sufficient development capacity to meet

expected demand for housing, business and industrial land in Māpua.

New issue statement 6.15.1.10 identifying the need to recognise the vulnerability from coastal inundation risk.

New issue statement 6.15.1.11 referring to the dam break hazard off Seaton Valley Road.

New issue statement 6.15.1.12 to acknowledge the infrastructure capacity constraints for water and wastewater at Māpua.

Amended policy 6.15.3.1 to allow for growth in Māpua in defined areas.

Amended policy 6.15.3.4 to include wider waterfront commercial area in policy.

Amended policy 6.15.3.5 to support residential growth and development of Māpua commercial area, and integration with adjoining reserves.

New policy 6.15.3.5A to avoid long-term light industrial land uses especially of land that is at risk from coastal inundation.

New policy 6.15.3.13A to provide for comprehensive developments in the MDRZ and in development areas in Māpua.

Amendment to policy 6.15.3.16 to remove irrelevant reference.

New policies 6.15.3.18 to allow residential development where water supply, wastewater, stormwater and transport infrastructure is available including where capacity is constrained.

New policy 6.15.3.19 to avoid residential development where water water supply, wastewater, stormwater and transport infrastructure is not available.

New policy 6.15.3.20 to ensure residential development is managed to maintain the integrity and efficiency of existing and planned infrastructure.

New policy 6.15.3.21 to avoid uniform repetition in areas of comprehensive development of four or more dwellings.

New policy 6.15.3.22 to prioritise the ecological values of Seaton Valley Stream and the wetland at 49 Seaton Valley Road by avoiding the keeping of cats on land adjoining these areas.

New policy 6.15.3.23 to ensure the management of the potential effects of the dam break hazard from the dam at 75 Seaton Valley Road.

Updated methods of implementation regarding regulation of MDRZ in locations that are appropriate and use of Outline Spatial Plans for large greenfield sites in Māpua.

Updated principle reasons to support and explain Māpua Medium Density changes and coastal inundation issues.

Section 6.16 Brightwater	Amendment of issue 6.16.1 removing an outdated population projection. Amendment of issues 6.16.1.1 and 6.16.1.7 acknowledging for flood hazard risk, both the potential for (private) dam break hazard on land between Katania Heights Road and the Brightwater Deviation State Highway and the need for road noise management in the same location. New issue 6.16.1.2B on the need to provide denser housing options and a variety of dwellings sizes in central Brightwater. Amendment of policies 6.16.3.1, 6.16.3.1A, 6.16.3.1B, 6.16.3.3A and 6.16.3.8 to include the effects of development of the land between Katania Heights Road and the Brightwater Deviation State Highway, as well as the potential for private dam break and need to manage road noise. New policy 6.16.3.1C on providing for comprehensively designed comprehensive developments in the MDRZ in Brightwater. Consequential amendments to 'methods of implementation' and 'principal reasons and explanation.'
Section 6.17 Wakefield	New issue 6.17.1.6B and 6.17.1.6C on the need to provide higher density housing options and a variety of dwellings sizes and sufficient business and industrial land in Wakefield. Relocation of Policy 6.17.3.7AA from 6.2.3.2C. New policy 6.17.3.7E on providing for comprehensively designed developments in the MDRZ in Wakefield. Consequential amendments to 'methods of implementation'.
Section 6.18 Murchison	New issue 6.18.1.5 on a lack of suitable land for light industrial purposes in Murchison. Consequential amendments to 'principal reasons and explanation.'
Chapter 7 Rural Environment Effects Section 7.1-Cumulative Effects of Land Fragmentation on Productive Opportunities	Amendment to existing policy 7.1.3.13 to enable workers' accommodation in the Rural 1 and Rural 2 zones, where productive value of the land is retained and further subdivision opportunities are avoided.
Section 7.2 Provision for Activities other than Plant and Animal Production	New policy 7.2.3.13 to avoid adverse effects on water quality, including from on-site wastewater in the Wastewater Management Area
Section 7.3 Rural Residential Development in Coastal Tasman Area	New policies 7.3.3.23 and 7.3.3.24 on enabling use of land for plant and animal production by providing for associated buildings which include workers' accommodation and enabling workers' accommodation in the Rural 3 zone.
Chapter 10A Papakāinga Development	New introduction to the new chapter, clarifying that activities in the papakāinga zone are addressed in chapter 17. Papakāinga development in zones other than the papakāinga zone is addressed

	in chapter 16. Chapter 10A provides guidance for papakāinga development anywhere in the District. New issues 10A1.1 to 10A1.3 recognising the barriers that Tāngata Whenua face to developing and using their ancestral land and how the proposed plan provisions seek to reduce these barriers for developing papakāinga. New objectives 10A.2.1 and 10A2.2 seeking to enable papakāinga development the design of which is led by Tāngata whenua, to support Tāngata whenua for the benefit of current and future generations. New policies 10A.3.1-10A.3.7 providing for papakāinga on land within the papakāinga zone, Residential, Medium Density Residential, Rural 1, Rural 2, Rural 3, and Rural Residential Zones. The location of which will be guided by Kaupapa Māori in accordance with tikanga Māori. Maximum densities of papakāinga development will be determined by the limitations of the site and the social, cultural, educational, recreational, health, temporary and commercial activities to be provided for as part of papakāinga, where they are consistent with Kaupapa, kawa and tikanga Māori. New 'methods of implementation,' 'principal reasons and explanation' and 'performance monitoring indicators'.
Chapter 11 Land Transport Effects	Amendment to Objective 11.1.2 to add resilience, require land-use integration and broaden reference to transport modes to acknowledge a range of modes of transportation Amendment to policy 11.1.3.4 to include human health as an outcome for mitigating noise effects from road noise. Amendments to policies 11.1.3.5 introducing the MDRZ to the land transport chapter and the requirement for turning spaces for vehicles where on site parking or loading is provided. New policies 11.1.3.5A, 11.1.3.5B, and 11.1.3.7A relating to the proposed MDRZ, requiring limited direct access to arterial routes, a safe access and egress for pedestrians, micromobility users or vehicles; promoting comprehensive development and co-location of housing with services to minimize number and length of vehicle trips and encourage use of non-car modes; and requiring appropriate accessible parking where on site parking is provided. Replace policy 11.1.3.7 to provide updated parking, loading and turning policy that acknowledges changed relationship between development and on-site provision for motor vehicles New policy 11.1.3.13 ensuring that specific needs of electric vehicles are implemented at the building design stage. New policy 11.1.3.14 ensuring the needs of electric vehicles are implemented at the building design stage. New policy 11.1.3.15 ensuring that waste and recycling is managed to maintain residential amenity.

	Consequential amendments to ‘methods of implementation’ and ‘principal reasons and explanation’.
Chapter 16 General Rules	**Permitted activity rules:**
Section 16.2 Transport	New expanded rules and some amended rules (16.2.2.1 (a) to (k)) on access and vehicle crossings. New rules on the design of micromobility access, including gradient requirements, where a vehicle access is not provided in the MDRZ (16.2.2.1 (aa)-(ad). New rules on provision for loading (16.2.2.3 (g)) within the MDRZ. New replacement rules on provision of cycle parking (16.2.2.3 (k) and (l) including table 16.2E on number of spaces. New rules on staff end of trip facilities for active transport modes (16.2.2.3 (m) including Table 16.2F on requirements. Amended rules on accessible parking (16.2.2.3 (n)), including table 16.2G on spaces. New rules on electric vehicle supply equipment (16.2.2.3 (q)) in the Medium Density Residential, Residential, Commercial and Central Business Zones. **Controlled activity rules** Minor amendment to 16.2.2.5 to add reference to Medium Density Zone **Restricted Discretionary Activity rules:** New matters of discretion for access and vehicle crossings (16.2.2.6 (3) to (5)). New matters of discretion for access to more than 20 dwellings in the Medium Density Residential, Residential, Commercial and Central Business Zones (16.2.2.6 (5A)). New matters of discretion for micomobility access design within the MDRZ (16.2.2.6 (27)). New matters of discretion for cycle parking and in the proposed Medium Density Zone, the storage of waste (16.2.2.6 (28). New matters of discretion for waste servicing (16.2.2.6(29). Consequential amendments to the ‘principal reasons for rules’. Removal of outdated Schedule 16.2B Bicycle Racks.
Section 16.3 Subdivision	**Controlled Activity rules in the Residential Zone:**
Sub section 16.3.3 Residential Zone	Deletion of subdivision rules relating to the operative Richmond Intensive Development Area (16.3.3.1). Amend Figure 16.3A to add reference to Māpua Outline Spatial Areas (cross reference to 16.3D).

	Amend advice note (2) of 16.3.3.1 (after (n)) to refer also to Outline Spatial Plans. Amend matter (ga) to also refer to the area of land between Katania Heights Road and the Brightwater Deviation. Add new matter (q) relating to the extent to which the development aligns with OSPs. Deletion of rules relating to controlled subdivision in the operative Richmond Intensive Development Area (16.3.3.1A). **Restricted Discretionary Activity rules in the Residential Zone (Standard density):** Deletion of subdivision rules relating to the operative Richmond Intensive Development Area (16.3.3.2A (b)). Inclusion of reference to Māpua Servicing (16.3.3.2A (g)). **Restricted Discretionary Activity rules in the Residential Zone (Richmond Intensive Development Area)** Deletion of subdivision rules relating to the operative Richmond Intensive Development Area (16.3.3.2B). **Restricted Discretionary Activity rules in the Residential Zone (Compact Density Specific Locations)** Amendment of a matter of discretion relating to stormwater management in subdivision in the Brightwater Development Area between Katania Heights Road and the Brightwater Deviation State Highway 16.3.3.3 (19B) **Discretionary Activity rules in the Residential Zone** Deletion of subdivision rules relating to the operative Richmond Intensive Development Area (16.3.3.4 (ba)). Reference to Māpua Servicing Capacity (16.3.3.4 (ba)). **Non-complying subdivision (Residential Zone)** Inclusion of reference to the Māpua servicing capacity (16.3.3.7).
Subsection 16.3.3A	**Land-Use Led Approach in the Medium Density Residential Zone** New rule 16.3.3A.1: Subdivision is a controlled activity if it is “land use led”—the design and layout of each allotment is established by reference to the siting of the dwelling and any other building to be authorised by land use consent under Rule 17.1A.3.2, 17.1A.3.3, or 17.1A.3.5. New rule 16.3.3A.2 - Subdivision is a controlled activity if it creates a vacant lot in an Outline Spatial Plan Area and meets a range of conditions. New rules 16.3.3A.3-16.3.3A.6 including conditions and matters of discretion for restricted discretionary, discretionary and non-complying activities for subdivision within the MDRZ.

Subdivision Rules for OSP Areas

New schedule 16.3D for OSPs. OSPs are required for large or strategic sites (generally >5000m² or as specified in Schedule 16.3D). These plans:

- Set out the spatial layout of roads, blocks, open space, and infrastructure.
- Guide the location, density, and form of future subdivision and land use.
- Ensure integration with existing settlements and landscape features.
- Subdivision in OSP areas must:
    - Be in accordance with the OSP (Rule 16.3.3A.2).
    - Achieve minimum net densities:
    - 18 dwellings/ha generally
    - 30 dwellings/ha in the Richmond Intensive Development Precinct
    - Or the density specified in the OSP
- Reserve “superlots” for future comprehensive development—these are larger lots within a subdivision that are not immediately developed, but are protected (e.g., via consent notices) for future higher-density development.
- Density bottom lines: The rules require that, when subdividing, you must not create standard density lots that would preclude achieving the minimum density for the area. This is enforced by:
- Avoiding standard density subdivision that would prevent future comprehensive development (Rule 6.4A.3.8(d)).
- Using consent notices and other tools to ensure reserved lots are developed as intended (Rule 6.4A.3.7(e)).

Subdivision in OSP areas

- Subdivision rules in OSP areas (Open Space or areas subject to an OSP) require:
- Compliance with the OSP for layout, reserves, roads, and infrastructure.
- Minimum density requirements as above.
- Protection of future development opportunities—lots must be sized and located to allow for future comprehensive development, and not just standard density housing.

Other Key Subdivision Controls

	• Minimum lot sizes and densities: Vary by area and development type (see rules 16.3.3.1, 16.3.3.1B, 16.3.3A.2, and associated figures). • Access and road network: Subdivision must provide for through-connected roads (not just cul-de-sacs), and must not create new direct accesses onto key arterial roads. • Stormwater, wastewater, and water supply: All lots must be serviced to Council standards, and stormwater management must use low-impact design where possible. • Reserves and open space: Subdivision must provide for reserves as shown on planning maps or OSPs, and vest them in Council. • Reverse sensitivity and noise: Subdivision near state highways or industrial zones must provide for setbacks and noise mitigation.
Sub section 16.3.4	**Business and Industrial Zone** New 16.3.4.1 condition (ca) relating to servicing capacity in Māpua. Minor amendments to 16.3.4.1 (i) and (m) to align. Inclusion of condition (b) to 16.3.4.4 to account for compliance with rule 16.3.4.1(ci). **Non-complying Subdivision Māpua** Amendment to 16.3.4.6 to remove reference to Tourist Services Zone and inclusion to reference rule 16.3.4.1 (ca).
Sub section 16.3.8 Rural Residential and Closed Zones	**Rural Residential Zone – Controlled activity rules** 16.3.8.1 condition (a) includes proposed amendments to figure 16.3C, which provides conditions on minimum allotment areas for subdivision in rural residential zone. It is proposed to be amended to include Rural Residential sites proposed for rezoning as part of PC81: - T-17a/c Pangatotara without reticulated wastewater servicing: minimum net lot area of 1ha - T-213, T-205 and T-17d Pangatotara: minimum net lot area of 4ha - T-140a Little Ōnahau, T-17a Pangatotara, T-198 Higgins Road and T-114a Eyles Road: minimum net lot area of 2ha - T-181 and T-219 Korere/Tophouse St Arnaud: minimum net lot area of 5,000 sq m. Inclusion of transmission line conditions (m) for specific additional sites. **Rural Residential Zone – Restricted Discretionary activity rules**

	Where subdivision falls to a Restricted Discretionary Activity status, for failing to comply with condition 16.3.8.1 (a) above on lot size, new conditions 16.3.8.1A (a) to (b) are proposed for subdivision in Pangatotora, Eyles Road and Little Ōnahau. This provides a more flexible set of lot sizes with a restricted discretionary rule to allow a lower minimum lot size but with an average lot size to enable a greater range of lot sizes to respond to topography. The new conditions also require that operative rule 16.3.8.1 condition (b) to (m) for controlled subdivision in the Rural Residential Zone are complied with. New restricted matters of discretion are proposed concerning geotechnical suitability of the land, onsite amenity and daylight access and existing matters (1) to (18) of Rules 16.3.8.1. It is proposed that applications that comply with conditions (a) to (b) of rule 16.3.8.1A will be decided without limited notification or public notification.
Sub section 16.3.20	Consequential amendments to the 'principal reasons for rules,' including deleting text relating to the Richmond Intensive Development Area and inserting text on the proposed MDRZ. The reasons for rules explain that comprehensive development in this new zone is land use led with subdivision enabled following the land use consent process. Subdivision without land use consent is generally not supported, as more efficient outcomes are achieved when the location and design of buildings precedes subdivision. There is a requirement to achieve a minimum level of density when subdivision is applied for in isolation.
Schedule 16.3A	**Assessment Criteria for Subdivision** Insertion of clause 4B noting that with subdivision applications Council will have regard to any land use consent that has been granted for a compact density, comprehensive development. New 4C and update to 42 to specifically reference OSPs where one applies to the site.
Schedule 16.3B	**Transport Conditions** Amendment to condition (b) relating to vehicle access. Minor amendment to (f) to add reference to OSPs.
Schedule 16.3C	**Services required on subdivision in certain zones** Deletion of Richmond Intensive Development Area from the schedule and replacement with MDRZ.
Schedule 16.3D OSPs	**Outline Spatial Plans** New Schedule (entire) that sets out the OSP framework, a description of key items, including the locations to which they apply, and an individual OSP for each location that specifies: • Map showing zone, development, infrastructure, open space and other spatially defined requirements for the location

- Contextual information, including site description and description of key features
- Development requirements
- Development guidelines

Section 16.14 Papakāinga Development	Proposed new section providing specific rules for papakāinga development in zones other than the papakāinga zone Papakāinga development rules in the papakāinga zone are provided in chapter 17.13. **Residential, Medium Density Residential, Rural 1, Rural 2, Rural 3, Rural Residential Zones – papakāinga development – Permitted Activity Rule** The new permitted activity rule 16.14.2.1 applies to certain land where the owners can demonstrate their whakapapa to the listed iwi / hapū (including land owned by legal entities that represent people in the listed iwi / hapū. New conditions must be met for permitted activity status covering the land ownership, a maximum number (10) of residential units per papakāinga development, compliance with Schedule 16.14A (which covers design and development standards) exclusion of nuisance activities, and that the site is not within the papakāinga zone. New proposed Schedule 16.14A provides the papakāinga development standards that must be complied with for the permitted Activity Rule 16.14.2.1. Papakāinga development and the construction or alteration of a building for the purposes of papakāinga development are exempt from all rules in Chapter 17. However Special Area rules still apply e.g. slope instability, coastal environment, fault line. **Residential, Medium Density Residential, Rural 1, Rural 2, Rural 3, Rural Residential Zones – papakāinga development – Restricted Discretionary Activity Rule** The new Restricted Discretionary Activity rule 16.14.2.2 applies when a papakāinga development does not meet the conditions of the new permitted activity rule above. New matters of restricted discretion are proposed on commercial activity effects, site coverage, setbacks , services and infrastructure, transport and access and others. Where applications meet this rule they will be processed without public notification, and would only be limited notified to specified persons, including immediate neighbours where they are deemed to be affected parties. A new Discretionary Activity rule is proposed 16.14.2.3 for papakāinga development proposed in the Central Business, Commercial, Conservation, Industrial, Mixed Business, Open Space, Recreation, Rural Industrial or Tourist Services Zone. Applicable changes to principal reasons for rules.

Chapter 17 Zone Rules	**Residential Zone – Land Use General - Permitted activity** Amendment to exclude the keeping of cats in the identified area in residential zone part of OSP Schedule 16.3D.10. Amendment to permitted activity conditions 17.1.2.1 (m) and (n) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays.
Subsection 17.1.2.3	This section is updated with the proposed deletion of rules 17.1.2.3 on Controlled activities (papakāinga development)
Subsection 17.1.3.1	**Permitted Activity Standard Density Development** Deletion of Richmond Intensive Development Area from conditions (p) and (z) on height of buildings and stormwater respectively
Subsection 17.1.3.2	**Controlled Activities Standard Density** Minor amendments to remove reference to Māpua Special Development Area.
Subsection 17.1.3.3	**Controlled Activities Compact Density** Delete reference to Māpua Special Development Area and reference to building height minimum in the Māpua Special Development Area
Subsection 17.1.3	**Restricted Discretionary Activities in Development Areas – Standard and Compact Density Development** Deletion of Richmond Intensive Development Area from the rule and condition (b) and Māpua Special Development Area. **Subsection 17.1.3.4C** **Restricted Discretionary Activities in Richmond Intensive Development Area – Intensive Development** Deletion of entire rule 17.1.3.4C conditions (a) to (k) and matters of discretion (1) and (2). **Discretionary Activities in Richmond Intensive Development Area – Intensive Development** Deletion of entire rule 17.1.3.4D condition (a) and matters of discretion (1) to (3).
Subsection 17.1.20	Consequential amendments to 'principal reasons for rules' in 17.1.20, removing references to Richmond Intensive Development Area and papakāinga development.
New section 17.1A MDRZ rules Land Use rules	**Medium Density Residential Zone Rules** Significant new section of rules for both land use and building construction or alteration on the proposed MDRZ.
Subsection 17.1A.2	**Permitted Activities Land Use General in the MDRZ**

New rule 17.1A.2.1 sets out the conditions (a) to (o) for permitted activities in this proposed new zone, covering the actual activities permitted, hours of operation for any non-residential activities, heavy vehicles stored or parked on site, air emissions, glare of exterior lighting or from building materials, kept animals, noise limits and stormwater.

Permitted Activities Land Use for Home Occupations in the MDRZ

New rule 17.1A.2.2 sets out the conditions (a) to (k) for permitted activities as home occupations, covering maximum gross floor area of buildings, the nature of the activities, hours of operation, visitor accommodation, the location on the site and a restriction on employment numbers.

Restricted Discretionary Activities Land Use for Home Occupations in the MDRZ

New rule 17.1A.2.4 sets out matters of discretion for a home occupation that does not comply with the permitted activity rule 17.1A.2.2. These include the extent to which the activity will result in the loss of residential activity on site, general adverse effects, visual and residential character effects, resulting traffic generation and pedestrian activity, employment needs.

Restricted Discretionary Activities Land Use for Community Activities in the MDRZ

New rule 17.1A.2.4 sets out matters of discretion for a home occupation that does not comply with the general permitted activity rule 17.1A.2.1 above. These cover loss of residential character, noise and visual effects, scale of any built development, traffic, parking and access adverse effects, duration of the consent and financial contributions, bonds and covenants.

Discretionary Activities Land Use General in the MDRZ

New rule 17.1A.2.6 on any land use proposed in the MDRZ that does not comply with the conditions of rules 17.1A.2.1 to 17.1A.2.5 above and new conditions (a) and (b) covering keeping of a rooster, pig or goat as well as intensive livestock farming, commercial boarding or breeding of animals.

Non-complying Activities Land Use General in the MDRZ

New rule clarifying that any land use that does not comply with the conditions of new rule 17.1A.2.6 is a non-complying activity.

New section 17.1A.3

MDRZ Rules

Building Construction or alteration rules

MDRZ Rules continued

Permitted Activities Building construction or alteration Standard Density development in the MDRZ

New rule 17.1A.3.1 sets out the conditions (a) to (y) for permitted activities for standard density building construction or alteration in this new zone, covering:

Permitted activity status for construction or alteration of buildings on vacant lots, subject to:

- Maximum of two dwellings per site (either joined or with one as a minor dwelling).
- Protection of integrity (from built development) of OSP design where one applies
- Compliance with site coverage, building coverage, fencing, outdoor living space, and daylight admission standards.
- Building envelope and height controls.
- Setbacks from roads, boundaries, and waterbodies.
- Stormwater and wastewater management.
- Access and waste/recycling space requirements.

Comprehensive Development (17.1A.3.2)

- Comprehensive Development (17.1A.3.2)
- Construction of two or more new dwellings on a site is a restricted discretionary activity, subject to:
- Achievement of a pass score in the Medium Density Design Matrix (Schedule 17.1AA).
- Minimum density requirements (20 dwellings/ha, or 30 dwellings/ha in the Richmond Intensive Development Precinct, or as specified in an OSP).
- Compliance with site coverage, building coverage, setbacks, outdoor living space, and other standards.
- All conditions, if not met, add specific matters of discretion but do not escalate the activity status.

New rule 17.1A.3.3 on the construction or alteration of a building that does not comply with permitted rule (17.1A.3.1), being a discretionary activity if the maximum number of new dwellings per site are two.

Non-complying activity Standard Density (17.1A.3.4) in the MDRZ for more than two dwellings.

Significant new text is proposed on the principal reasons for the new rules of the MDRZ. Key points include that the construction of two dwellings per site is a permitted activity, subject to limitations that are similar to those in the Residential Zone. However the redevelopment of the site for intensification for two or more dwellings is enabled with significantly fewer limitations and a policy direction of grant of resource consent if the conditions are complied with and the minimum number of points in the Medium Density Housing Design Matrix are achieved (new Schedule 17.1AA).

The development of more than two dwellings without a planned and land use led medium density proposal is not provided for and becomes a non-complying activity.

The development of more than one dwelling is supported and enabled by rule (17.1A.3.2) which provides a decision-making

	framework. The rule contains a set of conditions that guide processing and decision making. Unlike elsewhere in the TRMP, the rule continues to apply even if the conditions are not complied with, but additional matters of discretion become applicable For sites of medium density development a minimum density is specified in order to encourage three-four storeys, depending on location, and a compact built form. As well as intensification of existing developed areas the new MDRZ is also used for large greenfield sites in appropriate locations, some of which have outline development plans. In contract to the smaller sites that may involve infill and redevelopment, these larger sites require integrated urban design which can optimise density and resident amenity. Performance criteria (conditions) on rules impose controls for: • Site and building coverage • Setbacks • Building envelope and height • Outdoor living space • Access • Waste and recycling • Cross boundary effects from roads (implementing NPS-I) • Servicing and natural hazards (implementing NPS-NH) • Heritage features
Notification Provisions	Non-notification is provided for resource consent applications that comply with all conditions and achieve a pass score in the Design Matrix. Limited notification applies where key interface standards (boundary setbacks, building envelope) are not met and affected party approvals are not provided.
Medium Density Design Matrix (Schedule 17.1AA)	A new statutory Medium Density Design Matrix is introduced, providing a checklist of acceptable solutions for urban design, amenity, neighbourhood character, and onsite safety/functionality. Applicants must achieve a minimum score in each category for consent to be granted as a restricted discretionary activity.
Road Traffic Noise Overlay Modelling Inputs (Schedule 17.1AB)	A new schedule specifying roads with noise overlay requirements.
Section 17.2	**Central Business and Commercial Zone – Land Use - Permitted activity**

Central Business, Commercial and Tourist Services Zone	Amendment to permitted activity condition 17.2.2.1 (m) on noise generated by the activity, changing the days on which the daytime Leq noise limits have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays. Amendments to include reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity **Central Business, Commercial and Tourist Services Zone – Building Construction or Alteration – Permitted Activity** Amendment to Rule 17.2.4.1 to exclude commercial buildings in Māpua waterfront area from the scope of the rule. Amendment to permitted activity condition 17.2.4.1 (b) extending the height of buildings in Richmond and Motueka Commercial Zone to 14 metres rather than 10 metres. Addition of new rule 17.2.4.1C (Controlled Activity) to apply to new commercial buildings in Māpua waterfront area, with a focus on design outcomes. Amendments throughout rule to include reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity Consequential amendments to the 'principal reasons for rules' 17.2.20 concerning the change in building height, explaining that it is proposed to better provide for town centre living opportunities above ground floor in Richmond and Motueka. Also consequential amendments relating to commercial buildings at Māpua.
Section 17.3 Mixed Business Zone	**Mixed Business Zone – Land-use Permitted activities 17.3.2.1** Amendments to retail activity relating to retail floor area, outdoor floor area, retail product type, and service activities goods hire and service stations Amendments for all other activities relating to leasable floor area or maximum total gross floor area (whichever is lesser) Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity **Mixed Business Zone – Landuse Restricted Discretionary Activities 17.3.2.3** New activity conditions relating to retail activity, addressing floor area, type of goods, type of activity (hire, outdoor storage) New matters of discretion, relating to the type and scale of retail activity, effect on transport network, compatibility with surrounding area and the economic impact of it on other commercial centres **Mixed Business Zone – Landuse Discretionary Activity 17.3.2.4** Activity condition relating to retail activity floor area extent

	Amendment to matters for conditions on a consent relating to the scale, nature and type of retail activity and impacts on economic viability of commercial centres
	Mixed Business Zone – Building Construction & Alternation 17.3.3 set
	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
	Delete reference to requirement for windows adjoining retail frontage (permitted activity condition and reference within consent condition matters).
	Minor amendment to fencing requirement to reference Lower Queen Street (throughout).
Section 17.4	**Industrial Zone – Land Use – Permitted Activity**
Industrial Zone	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set).
	Amendment to permitted activity condition 17.4.2.1 (l) on noise generated by the activity, changing the days on which the daytime Leq noise limits have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays.
	New condition 17.4.2.1 (oa) on vehicle access to sites west of Main Road Hope, in the vicinity of legally defined sites to be rezoned as part of this plan change. New conditions also on vehicle access to the Network Tasman site at 24 Main Road, Hope.
Section 17.4 Industrial Zone	**Industrial Zone – Building Construction & Alternation – Permitted Activity**
	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
	New activity condition within 17.4.3.1 (v) and matter of control within 17.4.3.3 (29) relating to coastal inundation risk in the Māpua Light Industrial Zone.
	Consequential amendments to principle reasons for rules, updating references to residential zone proximity (to include medium density zone) and reference to coastal inundation risk at Māpua.
Section 17.5	**Rural 1 Zone – Land Use – Permitted Activity**
Rural 1 Zone	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set).
	Amendment to permitted activity condition 17.5.2.1 (c) to (d) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from

Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays.

Rural 1 Zone – Land Use – Controlled Activity

Deletion of the Controlled Activity status (linked to Schedule 17.5A) for land use for the Network Tasman Hope Depot in Main Road, Hope.

Rural 1 Zone – Land Use – Restricted Discretionary Activity (Papakāinga development)

Deletion of rule 17.5.2.7 on papakāinga development in the Rural 1 Zone.

Rural 1 Zone – Building Construction or alteration – Permitted Activity

Deletion of condition (f) on height of building under permitted activity rule 17.5.3.1 relating to the Hope Depot Network Tasman site.

Deletion of condition (h) on setbacks of building under permitted activity rule 17.5.3.1 relating to the Hope Depot Network Tasman site.

Deletion of condition (l) on building coverage under permitted activity rule 17.5.3.1 relating to the Hope Depot Network Tasman site.

Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)

Rural 1 Zone – Building Construction or Alteration – Controlled activity

New conditions 17.5.3.2 (kb) (kc) and (kd) as well as amendment of existing condition (k), so that as a controlled activity, the minimum size of the site of the workers' accommodation is smaller, at 5,000 sq m rather than the existing 12 hectares; new conditions are proposed on the potable water supply for workers' accommodation; a condition that as a controlled activity the maximum occupancy of all the workers' accommodation buildings do not exceed 35 people; and a condition that operative setback rules are complied with for workers' accommodation.

New matters of control are proposed under rule 17.5.3.2 for controlled activity building construction or alteration in Rural 1 Zone, such that workers' accommodation buildings will not be a consideration to support any future subdivision, and the requirement for an active transportation plan for workers' travel between the accommodation and town centres.

Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)

Rural 1 Zone – Building Construction or Alteration – Restricted Discretionary Activity and Discretionary Activity

	New matters of discretion 17.5.3.3 (6) to (10) proposed on workers' accommodation covering consideration of the effects of: vehicle access; car parking and traffic generation; noise; workers' accommodation buildings not being a consideration to support any future subdivision, and for an active transport plan for safe travel between accommodation and town centres. Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set) Consequential amendments to 'principal reasons for rules' 17.5.20. Deletion of Schedule 17.5A 'Activities on Network Tasman Ltd Site at Main Road Hope'.
Section 17.6 Rural 2 Zone	**Rural 2 Zone – Land Use – Permitted Activity** Amendment to permitted activity condition 17.6.2.1 (c) to (d) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set) **Rural 2 Zone – Land Use – Restricted Discretionary Activity (papakāinga development)** Deletion of rule 17.6.2.7 on papakāinga as a restricted discretionary activity in the Rural 2 Zone. **Rural 2 Zone – Building construction and alteration – Controlled Activity** New condition 17.6.3.2 (db) concerning the potable water supply for workers' accommodation. New condition 17.6.3.2 (dc) requiring the maximum occupancy of all the workers' accommodation buildings not to exceed 35 people. New condition 17.6.3.2(dd) requiring a safe active transport plan. New matters of control 17.6.3.2 (10) for controlled activity building construction or alteration in Rural 2 Zone, such that workers' accommodation buildings will not be a consideration to support any future subdivision, and for an active transport plan for safe travel between accommodation and town centres. New matter of control 17.6.3.2 (11) regarding the suitability of the Safe Active Transport Plan. Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set). **Rural 2 Zone – Building construction and alteration –Restricted Discretionary activity**

	New matters of discretion 17.6.3.4 (5) to (10) proposed on workers' accommodation covering consideration of the effects of: vehicle access; car parking and traffic generation; noise; workers' accommodation buildings, an active transportation plan for workers' access to town centres, and the workers' accommodation not being a consideration to support any future subdivision. Consequential amendments to 'principal reasons for rules' 17.6.20.
Section 17.7 Rural 3 Zone	**Rural 3 Zone – Land Use – Permitted Activity** Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set) Amendment to permitted activity condition 17.7.2.1 (d) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays **Rural 3 Zone – Land Use –Restricted Discretionary Activity – papakāinga development** Deletion of rule 17.7.2.4 on papakāinga development being a restricted discretionary activity in Rural 3 Zone. **Rural 3 Zone – Building construction or alteration – Controlled Activity** New condition 17.7.3.2 (ha) concerning the potable water supply for workers' accommodation. New condition 17.7.3.2 (hb) requiring the maximum occupancy of all the workers' accommodation buildings not to exceed 35 people. New condition 17.7.3.2 (hc) requiring a Safe Active Transport Plan. New matter of control 17.7.3.2 (11) for controlled activity building construction or alteration in Rural 3 Zone, such that workers' accommodation buildings will not be a consideration to support any future subdivision, and for an active transport plan for safe travel between accommodation and town centres. New matter of control 17.7.3.2 (12) for the suitability of a Safe Active Transport Plan. **Rural 3 Zone – Building construction and alteration –Restricted Discretionary activity** New matters of discretion 17.7.3.3 (4A) to (4D) proposed on workers' accommodation covering consideration of the effects of: car parking and traffic generation, and for an active transport plan for safe travel between accommodation and town centres. New matters of discretion 17.7.3.3 (29) on noise on workers' accommodation buildings not being a consideration to support any future subdivision and for an active transport plan for safe travel between accommodation and town centres.

	Consequential amendments to 'principal reasons for rules' 17.7.20.
Section 17.8 Rural Residential Zone	**Rural Residential Zone – Land Use – Permitted Activity**
	Amendment to permitted activity condition 17.8.2.1 (k) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays.
	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
	Rural Residential Zone – Land Use – Restricted Discretionary Activity (papakāinga development)
	Deletion of rule 17.8.2.4 on papakāinga development.
	Consequential amendments to 'principal reasons for rules' 17.8.20.
	Rural Residential Zone – Building Construction & Alternation – Permitted Activity
	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
	Amendment to 17.8.3.1 (g) (vii) to reference additional sites affected by electricity transmission lines
	Rural Residential Zone – Building Construction & Alternation – Controlled
	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
	Amendment to matters of control (5) to reference additional sites affected by electricity transmission lines
	Consequential amendments to principal reasons for rules, relating to deletion of Papakainga rules, references to Medium Density Zone, additional sites affected by electricity lines.
Section 17.9 Open Space Zone	**Open Space Zone - Land Use – Permitted Activity**
	Amendment to permitted activity condition 17.9.2.1 (b) and (c) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays
	Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
17.10 Recreation Zone	**Recreation Zone – Land Use -Permitted Activity**
	Amendment to permitted activity condition 17.10.2.1 (b) and (c) on noise generated by the activity, changing the days on which the

	daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
17.11 Conservation Zone	**Conservation Zone - Land Use -Permitted Activity** Amendment to permitted activity condition 17.11.2.1 (c) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set)
17.12 Rural industrial Zone	**Rural Industrial Zone - Land Use -Permitted Activity** Amendment to permitted activity condition 17.12.2.1 (j) and (k) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays
17.13 Papakāinga Zone	**Papakainga Zone Rules** Removal of the advice note. **Papakāinga Zone - Land Use -Permitted Activity** Amendment to scope of section clarifying that papakāinga development in zones other than the papakāinga zone is dealt with in chapter 16.14A. This section provides rules for papakāinga development in the papakāinga zone. **Papakāinga Zone – Land Use – Permitted Activity** Amendment to permitted activity condition 17.13.2.1 (a) setting out the activities that do not constitute a permitted activity in the papakāinga zone rather than the activities which are a permitted activity. Amendment to permitted activity condition 17.13.2.1 (b) on noise generated by the activity, changing the days on which the daytime Leq noise limits of 55 dBA have to be complied with from Monday to Friday, to Monday to Sunday and including (rather than excluding) public holidays Amendment to permitted activity condition 17.13.2.1 (c) to building setbacks and the insertion of figure 17.13A, so that required setbacks are less where the papakāinga adjoins the Residential Zone. Amendment to condition 17.13.2.1 (g) increasing the maximum building coverage requirements from 33% to 50%.

	Deletion of conditions 17.13.2.1 (h) and (i) on outdoor living space and site development plan. New conditions 17.13.2.1 (k) and (l) on maximum floorspace percentages of commercial activities in a papakāinga development, not exceeding the lesser of 20% or the area of 500 sq m. and wastewater disposal. Four new papakāinga sites are proposed to be zoned as part of PC81. Amendments to add reference to Medium Density Zone where Residential Zone is referenced regarding protection of residential amenity (throughout rule set) **Papakāinga Zone – Land Use – Restricted Discretionary Activity** PC81 proposes changing Resource Consent status for the Papakāinga Zone so that if a permitted standard is not met, a Restricted Discretionary pathway is provided which will be processed without public notification, and would only be limited notified to specified persons, including immediate neighbours where they are deemed to be affected parties (17.13.2.2A). The consent application is focussed on matters of discretion. Some new standards are also introduced. Removal of 17.3.2.2 discretionary activities and amendments to principal reasons for rules.
17.14 Deferred Zone Rules	Amendments to 17.14.1 scope of the deferral section and removal of non-relevant parts of 17.14.2. Amended Schedule 17.14A Deferred Zone Locations – inserting sites proposed for rezoning as part of PC81 that are deferred for infrastructure or servicing. Amendments to principle reasons for rules. A range of amendments to Schedule 17.14A – deferred zone locations.
Chapter 18.11 Coastal Environment Area	Amendment to 18.11.3.1 (f) relating to height, deletion of reference to the Māpua Special Development Area
Chapter 19 Information required for land use or subdivision consent - applications	Insertion of a new information requirement 19.2.1.9A requiring a completed assessment of the development against the Medium Density Housing Design Matrix in Schedule 17.1AA. New information requirement 19.2.1.9B for retail activity in the Mixed Business Zone, relating to retail activity impact on town centre functionality and commercial viability of town centres New information requirement 19.2.1.16B relating to workers' accommodation and the need for a safe active transport plan Minor amendment to 19.2.2.7 (iii) relating to dam break hazard at Pitfure Stream Insertion of new information requirement 19.2.2.7A for any standard density development in the MDRZ, comprising reasons why an intensive development is not appropriate or achievable for

	the site, assessments related to maximum possible density and market demand for the size of lots or houses proposed.
Volume 1 - Part II Appendix 2 Urban Design Guide which applies to Development Areas in Tasman.	Direct and consequential updates
Chapter 31 Rules for Water Take, Diversion, Use or Damming	Amendment to 31.1.5.1 - Permitted Activities (Damming and Diversion of Flood Waters) to remove references to the Richmond Intensive Development area
Volume 1 - Part VI Discharges **Chapter 36 Rules for Contaminant Discharges**	Proposed deletion of references to and Permitted Activity rule for Richmond Intensive Development Area on discharge or diversion of stormwater or drainage water. Amendment to 36.1.4.2 (l) discharge of domestic wastewater in the Wastewater Management Area relating to management in the WMA that applies in the Rural 3 Zone and site-specific management in the Little Ōnahau Rural Residential Zone and adjoining light Industrial Zone. Amendment to 36.4.2.1 (2) to add reference to Medium Density Zone and additional condition relating to a discharge from a void space. Deletion of entire rule 36.4.2.1A relating to discharges within the Richmond Intensive Development Area. The removal of reference to the Richmond Intensive Development Area from 36.4.2.2. Additions to the the principal reasons for rules in 36.4.20

Appendix 24 – PC81 Assessment against the National Policy Statement for Natural Hazards Risk Matrix, Likelihood and Consequences Table

Appendix 25 – Economic Assessment

Appendix 26 – Commecial Centres Hierarchy Introduced into the TRMP through PC81 Memorandum

Appendix 27 – Road Traffic Noise Modelling Memorandum

Appendix 28 – Options Evaluation Māpua Development Areas

Purpose and Relationship to the PC81 Section 32 Evaluation
This document is an evaluation of the Māpua Development Areas included in PC81. It is to be read alongside the PC81 Section 32 Evaluation Report of which this document is an appendix too.

The PC81 Section 32 Evaluation Report provides the statutory, policy and evidential framework for PC81 as a whole, including the national direction, regional and district policy context, growth strategy, and the justification for the proposed objectives, policies, zones and methods. That analysis is not repeated here.

Scope of this Evaluation
PC81 has regard to this long-term spatial intent by enabling the full extent of growth areas identified through the Masterplan.

The approach taken in Māpua reflects a balance between:

- enabling development to meet identified housing needs; and
- recognising infrastructure constraints and uncertainty.

This results in a planning framework that enables growth where it is feasible, while avoiding reliance on infrastructure capacity that is not yet established.

This evaluation assesses the appropriateness of the planning provisions proposed in PC81 for Māpua, having regard to the short to medium term demand, infrastructure constraints, and the strategic planning context established by the FDS and the MMP.

PC81 provides for the long-term planned growth of Māpua in accordance with the MMP, including maintaining capacity beyond the initial ten-year period. Infrastructure capacity in Māpua—particularly for water supply and wastewater—remains subject to limitations. This assessment is an options evaluation of long-term growth in Māpua.

This options assessment considers how urban growth is managed to provide for the long-term development identified in the MMP, while recognising that infrastructure capacity limits the extent and timing of development in the short to medium term. This includes safeguarding land for future urban development and ensuring that development is staged and aligned with the availability of infrastructure.

The evaluation focuses on the extent to which PC81:

- provides sufficient development capacity to meet anticipated demand over the next ten years (approximately 230 dwellings);
- contributes appropriately to wider urban capacity needs within the Tasman urban environment; and
- has regard to the long-term spatial outcomes of the FDS and the MMP.

The evaluation is not intended to reconsider the overall spatial growth pattern for Māpua as established through the FDS and the MMP. Its focus is on the most appropriate way to provide for short- to medium-term demand while still supporting longer-term growth outcomes in a manner that responds to infrastructure constraints and provides for the long-term spatial outcomes of the FDS and the MMP.

The assessment is focused on Mapua infrastructure constraints, particularly:

- reticulated water supply;
- wastewater infrastructure; and
- parts of the transport network.

As these constraints apply broadly across the Māpua Development Area, this evaluation examines whether PC81 provides an appropriate planning response by:

- enabling development where infrastructure capacity exists or can reasonably be managed;
- limiting or deferring development where constraints cannot yet be resolved;
- using zoning, policies and Outline Spatial Plans to manage sequencing, risk; and strategic spatial outcomes across the settlement.

This evaluation relies on, and incorporates by reference, the analysis and conclusions of the PC81 Section 32 Evaluation Report, including:

- the assessment of strategic objectives, including giving effect to the NPS-UD and TRPS and having regard to the TRPS C1, FDS and MMP;
- the evaluation of alternative zoning and policy approaches at a district-wide scale;
- the scale and significance assessment for PC81; and
- the evaluation of costs, benefits, efficiency, effectiveness and risk for PC81 as a whole.

Where these matters apply equally to Māpua, they are not repeated. This document should therefore be read as a supplementary, site-specific section 32 evaluation, rather than a standalone evaluation.

Higher-Order Statutory Context

Resource Management Act 1991

Several provisions of the RMA are particularly relevant to this Māpua-specific assessment.
Section 31(aa) confirms that Council's district planning function includes ensuring there is sufficient development capacity for housing and business land to meet expected demand. That obligation is relevant to Māpua because the settlement forms part of the Nelson–Tasman urban environment, and PC81 is one of the methods being used to provide additional plan-enabled capacity.
Section 75 establishes the relationship between the district plan and operative higher-order planning documents. A district plan must give effect to national policy statements and the operative regional policy statement. For this assessment, that means the Māpua provisions must give effect to the NPS-UD and the TRPS.

TRPS C1 has a different status. Under section 74(2), Council must have regard to a proposed regional policy statement when preparing or changing a district plan. TRPS C1 is therefore relevant to this assessment, particularly because it sets out the proposed updated regional direction for urban development, but it does not yet carry the same statutory weight as the TRPS.

The question for this assessment is therefore not only whether the Māpua provisions manage local servicing constraints, but whether they do so in a way that gives effect to the operative higher-order direction, while also having regard to the proposed direction in TRPS C1. This includes considering how the provisions support well-functioning urban environments, sufficient development capacity, and the integration of land use with infrastructure planning.

National Policy Statement Urban Development
The NPS-UD requires district plans to enable sufficient development capacity to support well-functioning urban environments, while being responsive to demand and providing for a range of housing and business opportunities.

For Māpua, the key issue is not whether growth should occur, but how growth is enabled within known infrastructure constraints. Māpua forms part of the Nelson–Tasman urban environment and has ongoing demand for residential and business development. PC81 has regards to meeting development capacity requirements established in the FDS.

At the same time, parts of Māpua are subject to servicing constraints, particularly in relation to water supply, wastewater and elements of the transport network. The NPS-UD does not require development to be enabled in a way that is inconsistent with infrastructure capacity or results in inefficient or uncoordinated outcomes. Rather, it requires a planning framework that is responsive, proportionate and supports the characteristics of a well-functioning urban environment.
In this context, PC81 gives effect to the NPS-UD by:

- enabling development in locations where infrastructure capacity exists or can reasonably be managed
- providing for a range of housing typologies and business opportunities consistent with identified demand
- using planning tools, including zoning, policy direction and Outline Spatial Plans, to manage the timing and sequencing of development
- avoiding uncoordinated or inefficient development that would undermine infrastructure functioning or urban form outcomes

Overall, PC81 adopts a balanced approach that enables growth in Māpua while recognising and managing infrastructure constraints. This approach is consistent with the NPS-UD's direction to provide sufficient and responsive development capacity, while supporting well-functioning urban environments over time.

NPS-Infrastructure 2025
The NPS-I promotes the efficient, integrated and resilient provision of infrastructure to support urban development. It emphasises the need for land use planning to be coordinated with infrastructure capacity and investment, including the timing and sequencing of development.
In Māpua, established constraints relating to water, wastewater and elements of the transport network require a managed approach to growth. These constraints mean that development cannot occur uniformly across the settlement without risking inefficient or uncoordinated infrastructure outcomes.

PC81 responds to this by aligning development capacity with infrastructure availability and planned upgrades. This includes:

- enabling development where infrastructure capacity exists or can reasonably be provided
- managing the timing and sequencing of development to reflect servicing constraints

- using zoning, policy direction and Outline Spatial Plans to support coordinated infrastructure and land use outcomes

This approach supports the NPS-I's direction to ensure infrastructure is used efficiently and that development occurs in a coordinated and sustainable manner over time.

Tasman Regional Policy Statement (including Change 1)

Under section 75(3) of the Resource Management Act, the Tasman Resource Management Plan must give effect to the TRPS. Plan Change 81 has been prepared to implement the urban development direction set out in the TRPS, including the amendments proposed through TRPS C1, which update and strengthen the policy framework relating to urban growth, housing capacity and well-functioning urban environments.

The TRPS establishes a direction to ensure sufficient development capacity for housing land, while avoiding, remedying or mitigating the adverse effects of urban development and protecting important environmental, cultural and amenity values. In particular, the TRPS C1 recognises the need for planned and well-sequenced urban development that makes efficient use of land and infrastructure, supports a range of housing types and densities, and contributes to well-functioning urban environments with good accessibility, infrastructure integration and resilience. These matters are directly relevant to Māpua as part of Tasman's urban environment.

The Māpua provisions within Plan Change 81 give effect to this regional policy direction by enabling residential intensification and comprehensive development within the existing settlement, while carefully managing known infrastructure constraints relating to water supply, wastewater capacity and transport. The proposed zoning framework, including the use of medium density zoning, deferred zoning where appropriate, and Outline Spatial Plans, provides a mechanism to align development with infrastructure availability and sequencing, consistent with the integrated management approach promoted by the TRPS.

Through this approach, PC81 implements the TRPS objectives and policies relating to urban growth by supporting housing supply and choice, promoting efficient use of land and infrastructure, and guiding development in a manner that maintains and enhances urban amenity and environmental quality. In doing so, the Māpua provisions give effect to both the long-standing regional policy framework and the updated urban development direction introduced through TRPS C1, while responding to the specific opportunities and constraints that characterise growth in Māpua.

Nelson Tasman Future Development Strategy
Clause 3.17(1) of the NPS-UD requires district plan changes giving effect to the NPS-UD to have regard to the relevant FDS. In this context, the FDS informs the assessment by setting out the agreed long-term growth role of Māpua and the broad locations where residential and business growth is anticipated. However, the FDS does not prescribe specific zoning outcomes or determine how development must be enabled in the short to medium term. Accordingly, this assessment has regard to the FDS by accepting its strategic growth signals for Māpua, while focusing the section 32 analysis on how that growth is most appropriately implemented through PC81.

Māpua Masterplan
Under the RMA, a territorial authority must have regard to management plans and strategies prepared under other Acts in accordance with s 74(2)(b) to the extent that their content has a bearing on resource management issues of the district.

The MMP was prepared under the Local Government Act 2002 and provides the long-term spatial framework for Māpua's residential and business growth. PC81 has regard to the MMP by;

- enabling the full extent of growth areas identified through the Masterplan; and
- prioritising the sequencing of development in line with infrastructure upgrades and capacity and enabling development to proceed as infrastructure constraints are addressed.

The New Zealand Coastal Policy Statement (NZCPS)

The NZCPS directs the management of the coastal environment and must be given effect to under the RMA. It provides direction on preserving natural character, protecting natural features and landscapes, managing coastal hazards, and enabling appropriate subdivision, use, and development within the coastal environment.

The NZCPS is directly relevant to the Māpua provisions of PC81. Māpua is a coastal settlement situated on the edge of the Waimea Inlet, with low-lying parts of the existing village and surrounding land exposed to coastal inundation risk, including the projected effects of sea level rise over the coming decades. The MMP recognises this vulnerability and anticipates a long-term strategic shift of urban development toward higher, more resilient land within the Seaton Valley area, enabling the gradual transition of the settlement away from low-lying coastal land over time.

PC81 responds to the direction of the NZCPS by locating new residential and business growth in areas that are less vulnerable to coastal hazards, avoiding or limiting further urban development in areas subject to significant coastal inundation risk, and supporting integrated land use and infrastructure planning that accounts for the current and future effects of climate change. This includes the use of deferred zoning, Outline Spatial Plans, and supporting policy in Section 6.15 of the TRMP (which introduces a new issue recognising Māpua's vulnerability to coastal inundation) to manage the location, timing, and form of development in a way that is consistent with both the NZCPS and the long-term spatial outcomes of the MMP. A site-specific Coastal Inundation Assessment of MMP sites is provided in Appendix 17.

Statutory Documents directing resilience in the face of coastal hazards

Higher order national direction, including the National Adaptation Plan (NAP), and the National Policy Statement for Natural Hazards (NPS-NH), consistently point toward a careful and conservative approach to decision-making in areas subject to coastal hazard risk. Collectively, these documents emphasise the need to recognise the long-term and increasing risks associated with climate change and sea level rise, and to respond in a way that avoids creating or exacerbating those risks over time. This includes directing development away from vulnerable areas, adopting a precautionary approach where there is uncertainty, and ensuring that short-term decisions do not compromise the ability to respond to long-term change. As noted in the National Adaptation Plan, "local government should act now", reinforcing that a proactive and forward-looking approach is required rather than deferring difficult decisions.

Summary of Infrastructure Constraints and Opportunities

Māpua has two key infrastructure constraints to development that need to be specifically addressed:

Water Supply and Wastewater Infrastructure Servicing Constraints

Development in Māpua is constrained by limited wastewater and water supply capacity. Māpua is serviced by a pumped wastewater system that conveys flows out of the settlement by a trunk main.

While the existing wastewater and water supply networks can accommodate some additional development in the short to medium term, available capacity is uncertain.
Several wastewater upgrades are identified in the LTP within the short to medium term timeframe, including:

- new wastewater pump stations and storage upgrades;
- improvements to the wastewater rising main network; and
- upgrades to water reticulation, pump stations and distribution pipe networks.

However, there is sufficient wastewater and water supply capacity within the existing networks, together with planned short to medium term upgrades, to accommodate anticipated growth in Māpua over the next ten years, including the level of development enabled through PC81 and a degree of additional supply.

Servicing the settlement at full development capacity will require more substantial upgrades to the wider network. As illustrated in Figures 10.1 and 10.2, this is most likely to be achieved through a trunk main upgrade across the Māpua estuary inlet. The Māpua Channel wastewater and water supply trunk upgrades are currently programmed for implementation beyond year 10 of the Council's LTP. Until those upgrades occur, infrastructure capacity remains available but constrained, and the ultimate extent and timing of development will need to be managed in response to available servicing.

Accordingly, while development capacity can be enabled through PC81, the timing and scale of development must be aligned with infrastructure availability. This requires an approach that allows development to proceed where servicing capacity exists, while managing development so that it does not exceed the capacity of the network.

Figure 28.1 – The Māpua Water Supply and Wastewater Network

Figure 28.2 The Water Supply and Wastewater Network under the Māpua Inlet.

Transport Considerations

Much of Māpua's local road network was developed to rural or semi-rural standards and lacks continuous footpaths, cycling facilities, and safe crossing points. These limitations are particularly evident along Seaton Valley Road and Higgs Road.

Future development areas are expected to improve internal and external connectivity where practicable, including:

- avoiding excessive cul-de-sac lengths; and
- providing pedestrian and cycle links to better integrate new development with the existing settlement.

There are currently no major Council-funded transport upgrades programmed for Māpua in the Long Term Plan. As a result, many transport responses are expected to be developer-led, delivered as development proceeds. These may include local road upgrades, intersection improvements, footpaths, and cycling connections.

Traffic growth associated with PC81 is expected to place increased pressure on the intersection of Mapua Drive with State Highway 60 (See Figure 28.3). The cumulative effects of additional traffic on State Highway 60 have been identified as a concern. NZTA Waka Kotahi, as the road controlling authority, has been involved in consultation on PC81, the MMP, and the FDS. Any works affecting the state highway network, such as intersection upgrades or speed management measures, would require the approval of NZTA Waka Kotahi.

Figure 28.3 – Mapua Drive / SH60 intersection

The Council's Transportation Planner has advised that there may be a limit to how much further development can be accommodated in Mapua due to additional pressure on the SH60 intersection. This is an emerging situation as over recent months there has been an increase in accidents. The Council are advocating to NZTA Waka Kotahi for a project to be included in the State Highway Investment Proposal 2027. In addition, at the time of writing Council is commissioning a detailed traffic assessment of the intersection.

Landowner Intentions

In addition to the timing of infrastructure delivery, the options assessment also takes account of developer intentions and likely market behaviour. Evidence to date indicates that landowners on the edge of the settlement, particularly along Seaton Valley Road, have stronger and more immediate intentions to develop, including one approved fast track application under the Fast Track Approvals Act 2024. While this is rational from an individual landowner perspective, it is less desirable from an urban form and infrastructure-planning point of view, as it risks capacity being taken up in locations that are further from the town centre and existing services. This dynamic reinforces the core challenge facing Māpua: without an explicit planning response, early development is likely to be driven by market timing rather than by strategic considerations relating to urban form, integration, and long-term infrastructure efficiency.

Summary of Sites and Yields

Table 28.1 below identifies the PC81 Mapua Development Area sites that are proposed for residential rezoning and the expected residential yield. The sites highlighted in blue currently have a rural zone (Rural 1 or Rural Residential). The Rural Residential (unserviced) min lot size is 2 hectares.

Table 28.1 Māpua sites and proposed yield

Site Code	Location	Current Zone	Proposed Zone	Approx Yield	Deferred	Notes
T-11a	Seaton Valley Road	Rural Residential (unserviced)	Residential	46	Yes	
T-11b	Seaton Valley Road	Rural 1	Medium Density Residential	90	Yes	
T-33a	Seaton Valley Road	Rural Residential (unserviced)	Medium Density Residential	249	Yes	
T-33b	Seaton Valley Road	Residential	Medium Density Residential	53	Yes	
T-250	Seaton Valley Road	Rural 1 deferred Residential	Medium Density Residential	54	Yes	
T-245	Seaton Valley Road	Rural 1 deferred Residential	Medium Density Residential	95	No	Already consented and under construction
T-42a	Stafford Drive / Seaton Valley	Rural 1 deferred Rural Residential (Serviced)	Residential	140	Yes	
T-237a	Higgs Road	Rural 1 (deferred Residential)	Medium Density Residential	135	No	
T-237b	Jessie Street	Residential / Rural 1 deferred Residential	Medium Density Residential	32	No	
T-237c	Higgs Road	Rural 2	Residential	0	No	
T-237d	Higgs Road	Rural 1 deferred Residential	Residential	1	No	
T-237g	Higgs Road	Rural 1 deferred Residential	Medium Density Residential	137	Yes	
T-238a	Higgs Road	Residential	Medium Density Residential	28	No	
T-240a	Aranui Road	Rural Residential deferred Residential	Medium Density Residential	7	No	
T-240b	Aranui Road	Residential	Medium Density Residential	2	No	
T-246a	Higgs Road	Residential	Medium Density Residential	30	Yes	Intensification of existing residential area
T-246b	Higgs Road	Residential	Medium Density Residential	20	No	Intensification of existing residential area

T-238a	Higgs Road	Rural 1 deferred Residential	Medium Density Residential	28	No	
T-238b	Higgs Road	Residential	Medium Density Residential		No	

Māpua Options

Given the level of development capacity enabled through PC81, and the infrastructure constraints identified in Māpua, there are a number of potential approaches to how development capacity could be provided for and managed. Four options have been assessed.

Māpua Option 1 – Provide Short and Medium Term Capacity
This option limits zoning to provide sufficient development capacity to meet the identified 10-year demand, including the required NPS-UD competitive margin (approximately 230 dwellings).
Under this approach, zoning is applied to a limited number of sites that can be serviced in the short to medium term. Other sites are not progressed at this stage and would require a future plan change when additional capacity is needed.

Māpua Option 2 – Provide Capacity Aligned with Trunk Infrastructure Capacity
This option provides development capacity up to the approximate level of servicing capacity available in the existing trunk wastewater and water supply systems (approximately 400 dwellings).
Under this approach, a selection of sites is zoned for development to reflect estimated infrastructure capacity, while other sites are deferred or not progressed until further infrastructure upgrades are in place.

Māpua Option 3 – Mixed Zoning Approach with Future Urban Zone for Rural Areas
This option zones existing urban-zoned land for development, and rural residential and rural zoned land as Future Urban Zone (a new TRMP zone). This approach seeks to identify areas for future urban growth while limiting development of those areas until further planning processes or infrastructure upgrades are undertaken.

Māpua Option 4 – Enable Full Capacity with Managed Staging Through Planning Provisions
This option zones all the PC81 Māpua Development Area sites to their intended urban zones, consistent with the MMP. Under this approach, the timing and extent of development is managed through deferred provisions, infrastructure-linked constraints, and plan rules that respond to available servicing capacity. Development can proceed where infrastructure is available, while constraints are applied where capacity is limited.

Estimated Demand Assessment against each Option

Table 28.2 below summarises the estimated demand[7] for residential development in Māpua and the level of PC81-enabled supply provided under each option. It highlights the extent to which each option can meet projected demand, as well as the differing approaches taken to enabling development capacity. In particular, it illustrates the distinction between options that rely on a limited number of sites or constrained zoning approaches, and those that provide a broader and more flexible framework for achieving the long-term spatial outcomes identified in the FDS and MMP.

[7] Tasman Housing and Business Capacity Assessment 2024

Table 28.2 Estimated Demand for Residential Development in Mapua

Option	Short and Medium Term Demand (dwellings)	PC81 Plan-enabled Supply (Māpua dwellings)	Key characteristic
Option 1	230	Depends on sites chosen	Limited capacity Selected sites
Option 2	230	Approx 400	Selected sites
Option 3	230	621 (remaining 525 Future Urban Zone)	Full capacity Future zoned land
Option 4	230	1023	Full capacity 30 year spatial framework protected and enabled

Evaluation of Māpua Options

In accordance with section 32(1)(b), Tables 28.3 to 28.6 examines the extent to which each option is the most appropriate way to achieve the objectives of PC81 in Māpua.

Before considering the relative costs, benefits, effectiveness and efficiency of the options, it is important to recognise the broader context within which these decisions are being made.

Māpua is a relatively small settlement that is expected to experience long-term change, including the effects of sea level rise, changing demographics, and evolving housing needs. The availability of land suitable for urban development is limited, with much of the remaining development potential located on the hills within the Seaton Valley area.

The MMP was developed to provide a long-term, integrated framework for how the settlement should grow and adapt over time. It reflects a strategic approach to managing growth, infrastructure, and environmental outcomes over a 30-year period, consistent with national direction requiring planning for the long term.

Historically, land use decisions have often been made in response to short-term needs, without fully considering long-term implications. This has often resulted in development patterns that constrain future options and limit the ability to respond effectively to changing environmental and social conditions.

In the case of Māpua, there is an opportunity to adopt an approach that supports long-term resilience and avoids outcomes that cannot be reversed. In particular, the use of remaining developable land will have lasting implications for the settlement's ability to respond to issues such as sea level rise and the need for more efficient urban form. A particular risk in this context is the ongoing subdivision of rural residential land for low-density lifestyle development, which can foreclose future opportunities for more efficient urban use and limit the ability to achieve the intended long-term spatial outcomes of the FDS and the MMP.

A key consideration in evaluating the options is therefore the extent to which they:

- provide for immediate development needs; while
- maintaining flexibility and capacity to respond to long-term change; and
- avoid development patterns that foreclose future opportunities.

The options assessed reflect different approaches to balancing these considerations against infrastructure limitations, particularly in relation to the use of remaining rural residential land and the ability to achieve the intended outcomes of the FDS and the MMP.

Table 28.3: Assessment of Māpua Option 1

MĀPUA OPTION 1	Costs (environmental, economic, social, cultural)	Benefits (environmental, economic, social, cultural)	Effectiveness and Efficiency
Provide development capacity limited to meeting the 10-year demand and required NPS-UD competitive margin.	Under this option, zoning is limited to a small number of sites to meet short to medium term demand only. While this approach aligns closely with the existing infrastructure capacity, it results in a constrained pattern of development with a number of associated costs. **Environmental costs** • Limits the ability to achieve integrated environmental outcomes identified in the MMP, including coordinated open space, stormwater management, and landscape outcomes • Enables rural residential land to continue to be developed for low-density lifestyle blocks, resulting in inefficient use of land and reducing the ability to achieve more integrated and planned urban development outcomes. • May result in fragmented or uncoordinated development if additional capacity is later enabled through future plan changes or Fast Track Legislation • Reduces the potential to achieve comprehensive, planned development across larger sites **Economic costs** • Restricts the overall supply of development capacity, which may	Under this option, zoning is limited to a small number of sites to meet short to medium term demand only. This approach provides a focused and conservative response to growth. **Environmental benefits** • Limits the extent of land zoned for development, reducing the immediate environmental footprint of urban expansion • Aligns development closely with existing infrastructure, reducing the need for new infrastructure works • Provides time for further assessment and refinement of environmental outcomes for future development areas **Economic benefits** • Provides a clear and certain level of development capacity to meet immediate demand • Reduces upfront infrastructure investment requirements by limiting development to areas that can be readily serviced • Allows Council to stage future infrastructure investment in a more controlled and incremental manner **Social benefits** • Supports development within existing serviced areas, which are typically closer to current services and facilities • Limits short-term disruption associated with large-scale greenfield development	**Effectiveness** This option is effective only in a limited sense, in that it provides development capacity broadly aligned with the identified short to medium-term demand of approximately 230 dwellings. It establishes a direct relationship between projected demand and zoned capacity, and enables development to proceed on sites that are capable of being serviced in the short to medium term. However, the effectiveness of this option is constrained by its reliance on a small number of development sites. In the context of Māpua, where development is typically delivered on relatively large landholdings, the delivery of development capacity is highly dependent on individual site uptake. If one or more sites do not proceed as anticipated, there is a material risk of undersupply. At the same time, this approach may exclude other sites that are capable of being serviced and could otherwise contribute to development capacity. This introduces a risk that development opportunities are constrained not by infrastructure availability, but by zoning choices, resulting in an inefficient allocation of capacity and limiting the ability of the market to respond to demand. As a result, this option does not reliably achieve the PC81 objectives relating to the provision of sufficient and responsive development capacity or the creation of well-functioning urban environments. In particular, it does not provide the level of certainty or flexibility required to ensure that capacity is available over time or to respond to changing demand and development opportunities. The option is also less consistent with the requirements of the NPS-UD, which requires development capacity to be both sufficient and

	constrain housing supply and reduce market responsiveness • Results in inefficient use of land and infrastructure, as development at lifestyle block densities reduces the availability of land for more efficient urban use and increases long-term servicing and infrastructure costs per dwelling • Limits the ability for Māpua to contribute to wider urban capacity needs, particularly where other Tasman settlements are constrained • May increase future planning and infrastructure costs through the need for additional plan changes and reactive infrastructure upgrades **Social costs** • Limits housing choice and availability in Māpua in the short to medium term • Reduces the ability to provide for a diverse range of housing typologies and communities • May delay the delivery of community infrastructure and amenities associated with larger or more comprehensive developments **Cultural costs** • Constrains the ability to give effect to the broader spatial and cultural outcomes identified through the MMP • Limits opportunities to integrate cultural values and design outcomes across a wider, coordinated growth area	**Cultural benefits** • Allows time to further consider cultural values and outcomes across a broader area before enabling more extensive development • Supports a more cautious and incremental approach to change, which may align with some community preferences	responsive. While the option enables development on sites that are initially serviceable, the combination of reliance on a small number of sites and exclusion of other potentially serviceable sites limits the ability of the market to respond, and does not provide a competitive margin over time. When assessed against the operative TRMP objectives, the option provides only partial support for Objectives 6.1.2.1 and 6.1.2.2, as it enables some development and housing choice, but does not ensure a sufficiently robust or diverse supply of development opportunities. It is also less effective in achieving Objective 6.2.2.2, as it does not promote the efficient use of land and infrastructure where development opportunities are constrained by zoning rather than servicing capacity. Overall, while the option provides a narrowly defined response to short-term demand, it is limited in its ability to achieve the broader objectives relating to capacity, responsiveness, and long-term urban form. **Efficiency** This option demonstrates a degree of short-term efficiency by limiting development to a small number of sites and avoiding the enabling of surplus capacity. This reduces the immediate need for infrastructure investment and simplifies the planning framework in the short term. However, this efficiency is reduced over time due to the risks associated with constrained and uneven supply. If development does not proceed on the selected sites, additional planning processes, including plan changes or private plan changes, are likely to be required to enable further capacity. This introduces additional administrative costs and increases complexity in infrastructure planning and delivery. In addition, by limiting development to a defined set of sites, the option may prevent other landowners with serviceable land from bringing forward development. This creates a risk of perverse outcomes, where development is constrained despite infrastructure being available,

	• May result in a piecemeal approach to development that does not fully reflect aspirations identified through engagement processes		resulting in inefficient use of land and reduced responsiveness to demand. This is inconsistent with the NPS-UD requirement to enable a responsive supply of development capacity and support well-functioning urban environments. It also reduces overall efficiency under Objective 6.2.2.2, as land and infrastructure are not used optimally across the settlement. From a longer-term perspective, the option results in a reactive and fragmented approach to growth, with capacity needing to be progressively enabled through additional interventions rather than through a coordinated planning framework. Overall, while the option reduces costs and complexity in the short term, it results in increased long-term inefficiencies through constrained supply, reduced market responsiveness, and the need for additional planning processes.
	Economic Growth	**Employment**	
	Under this option, development capacity is limited to meeting short to medium term demand only. This approach enables a modest level of economic activity associated with residential development over the short term, with construction activity aligned to the delivery of approximately 230 dwellings. This supports local contractors, suppliers, and associated services over a defined period. However, the close alignment between demand and zoned capacity means that economic growth is highly dependent on the timely delivery of a small number of	Employment under this option is closely tied to the delivery of a limited number of development sites. Construction activity would generate employment for contractors, trades, and suppliers over the short term. However, the relatively small scale of development and reliance on individual sites means that employment opportunities are limited in duration and continuity. Where development does not proceed as anticipated, employment activity is likely to reduce accordingly. This may result in periods of reduced or inconsistent employment within the building sector. The limited scale of population growth under this option also constrains longer-term employment opportunities associated with the expansion of local services, businesses, and community facilities.	

	sites. In the context of Māpua, where development is typically delivered on relatively large sites, any delay or failure of a site to proceed would result in a material reduction in housing supply. This creates a risk that economic activity associated with residential development becomes constrained or interrupted. As a result, the option provides limited resilience in supporting ongoing economic growth and is sensitive to changes in market conditions or development timing. The constrained level of supply also limits the extent to which Māpua can contribute to wider economic growth within the Tasman urban environment.	

Table 28.4: Assessment of Māpua Option 2

MĀPUA OPTION 2	Costs (environmental, economic, social, cultural)	Benefits (environmental, economic, social, cultural)	Effectiveness and Efficiency
Provide development capacity aligned with the approximate servicing capacity of the existing trunk wastewater and water supply network.	**Environmental costs** • Limits the ability to achieve integrated environmental outcomes across the full MMP area, as development is only enabled on a subset of sites • May result in fragmented development patterns where only selected sites are enabled, reducing opportunities for coordinated and comprehensive development • Increases pressure for continued low-density lifestyle subdivision on rural residential land outside the	**Environmental benefits** • Aligns development with known infrastructure capacity, reducing the risk of environmental effects associated with overstressing the network • Limits the extent of development requiring major infrastructure upgrades in the short to medium term • Provides a more controlled pattern of development than enabling full capacity **Economic benefits** • Provides a greater level of development capacity than Option 1, supporting	**Effectiveness** This option is effective to the extent that it seeks to align development capacity with known trunk infrastructure constraints. It enables a greater level of supply than Option 1, while maintaining a clear relationship between zoning and the approximate capacity of the water and wastewater networks. This provides a more infrastructure-informed response to short to medium-term development pressure than a simple demand-based zoning approach. However, the effectiveness of this option is constrained in two important respects. First, as with Option 1, it relies on selected sites coming forward when anticipated. If development does not occur on those sites, there remains a risk of undersupply, despite infrastructure

zoned areas, resulting in inefficient land use and reducing the ability to achieve more integrated urban development outcomes
- Risks the irreversible loss of rural residential land to lifestyle blocks, foreclosing future opportunities for more efficient urban development and limiting the ability to achieve the long-term spatial outcomes of the FDS and MMP

Economic costs
- Requires the selection of specific sites to be zoned, which may not align with where development demand occurs, leading to inefficient allocation of development capacity
- May constrain development in some locations while development pressure shifts to other areas where infrastructure capacity remains available, reducing the efficiency of infrastructure use
- Relies on an estimate of trunk infrastructure capacity that is subject to uncertainty, which may affect the timing and coordination of investment
- Results in inefficient use of land and infrastructure where rural residential land continues to be developed at low densities, reducing the overall yield achievable from available land
- Reduces the long-term availability of land for more efficient urban development by allowing lifestyle subdivision to occur outside the zoned

increased construction activity and economic activity in the short to medium term
- Aligns zoning with infrastructure capacity, reducing the need for significant upfront infrastructure investment
- Supports a more continuous level of development activity compared to Option 1

Social benefits
- Provides increased housing supply relative to Option 1, improving availability and choice
- Supports development at a larger scale while maintaining alignment with infrastructure constraints
- Allows for some additional flexibility in how housing demand is met

Cultural benefits
- Advances some elements of the Māpua Masterplan, particularly in areas that are zoned for development
- Provides opportunities for cultural outcomes to be incorporated within those developed areas
- Retains the ability to consider broader cultural outcomes in future planning processes

capacity being notionally matched to the zoning pattern. Second, the converse problem can also arise: other landowners may be willing and able to develop serviced land, but are prevented from doing so because their land has been left outside the zoned area. This means development opportunities may be constrained by site selection rather than by the true availability of servicing, reducing the responsiveness of the framework.

This limits the extent to which the option can reliably achieve the PC81 objectives relating to sufficient and responsive development capacity and the creation of well-functioning urban environments. It also weakens alignment with the NPS-UD direction that planning decisions should contribute to well-functioning urban environments by enabling a variety of homes and a responsive development market, and that sufficient development capacity be provided over time. The policy wiring prepared for PC81 and TRPS C1 explicitly links those NPS-UD outcomes to the proposed urban framework.

More fundamentally, this option is less effective in securing the long-term spatial outcomes of the Māpua Masterplan. By limiting zoning to selected sites and leaving substantial areas of rural residential land outside the long-term urban framework, it creates a real risk that those areas will continue to be subdivided for low-density lifestyle development. That would actively undermine the intended long-term urban structure for Māpua and reduce the ability of the settlement to achieve a compact and resilient urban form.

This is particularly important in light of the coastal inundation assessment. The appendix shows that many of the lower-lying coastal plain sites in Māpua become increasingly exposed to coastal inundation by 2130, while the Seaton Valley Road slope site remains above the inundation levels assessed. In that context, an approach that does not secure the more resilient long-term growth locations is less effective in achieving operative Objective 13.1.2.2, which requires land development, including supporting infrastructure, to be resilient to natural hazards. It is also less effective in achieving Objective

areas, increasing the cost of servicing future development
- Risks foreclosing future development opportunities through the irreversible fragmentation of rural residential land, limiting the ability to achieve more efficient and coordinated urban development and increasing long-term infrastructure and servicing costs

Social costs

- Limits housing choice to a subset of sites, which may not align with market preferences
- May result in slower or uneven delivery of housing if selected sites do not come forward
- Delays development of other sites that could otherwise contribute to housing supply

Cultural costs

- Partially gives effect to the Māpua Masterplan, but not across the full extent of identified growth areas
- Limits opportunities to integrate cultural outcomes across a wider, coordinated development area
- May result in a piecemeal development pattern that does not fully reflect the outcomes identified through engagement processes

6.2.2.2, because it does not maintain efficient long-term options for land and infrastructure use across the settlement.

Efficiency

This option has some short-term efficiency because it seeks to align zoning with estimated infrastructure capacity, thereby reducing the need for immediate infrastructure upgrades and avoiding the enabling of more capacity than can be readily serviced in the short term. It is therefore more efficient than Option 1 in terms of initial infrastructure alignment.

However, that short-term efficiency is offset by longer-term inefficiencies. Because the approach depends on selecting specific sites, there is a risk that development does not occur where anticipated, while other land that could be serviced remains unavailable. This can lead to infrastructure capacity being underutilised or used inefficiently, and to growth occurring in a more reactive and less coordinated manner than intended.

The option is also inefficient because it does not secure the long-term resilient growth pattern for Māpua. If rural residential land outside the zoned area continues to be subdivided for lifestyle development, future opportunities for more efficient urban development may be foreclosed. In practical terms, this risks locking in a lower-density and less resilient urban form, contrary to the spatial intent of the MMP and the wider efficiency outcomes sought by the operative and proposed objectives.

From a planning perspective, the option is also likely to require further plan changes over time, either to respond to unmet demand, to bring forward additional land, or to correct for market outcomes not anticipated by the initial zoning pattern. That introduces additional administrative cost and reduces the overall efficiency of the framework compared with an approach that secures the long-term spatial pattern from the outset.

Overall, while Option 2 offers a degree of short-term efficiency through infrastructure alignment, it is less efficient over time because it constrains market responsiveness, risks inefficient use of land and servicing, and may actively undermine the long-term resilient growth pattern intended for Māpua.

	Economic Growth	Employment
	Under this option, development capacity is provided up to the approximate level of servicing capacity available in the existing trunk wastewater network. This approach supports a higher level of economic activity than Option 1, with increased construction activity associated with the delivery of a larger number of dwellings. This is likely to support a more sustained level of activity in the building sector and associated industries over the short to medium term. However, the level and distribution of economic growth is influenced by the sites that are selected for zoning. Where development does not occur on those sites, economic activity may be more limited or uneven over time. The constrained level of zoned capacity also limits the extent to which Māpua can support broader economic growth within the Tasman urban environment.	Employment effects under this option are greater than under Option 1, reflecting the increased scale of development activity. Construction of a larger number of dwellings would support employment in the building sector, including contractors, trades, and suppliers, over a longer period of time. This may also support additional employment in local services as population increases. However, employment generation is dependent on where and when development occurs. If development does not proceed on the sites that are zoned, employment activity may be delayed or uneven. The overall scale of employment growth is also constrained by the limited level of development capacity provided under this option relative to the full extent of potential growth areas.

Table 28.5: Assessment of Māpua Option 3

MĀPUA OPTION 3	Costs (environmental, economic, social, cultural)	Benefits (environmental, economic, social, cultural)	Effectiveness and Efficiency

Maintain zoning of existing urban areas as outlined in PC81 and rezone rural and rural residential land as Future Urban Zone or retain the land in its existing rural zoning eg: Rural residential and Rural. Note: the Future Urban Zone would be a new TRMP zone.	**Environmental costs** • Environmental costs are limited in the short term, as the option restricts the extent of land available for development • May delay the achievement of integrated environmental outcomes across the full MMP area • Where existing zoning remains in place, there is potential for continued low-density development, which may not align with the intended long-term urban structure **Economic costs** • Defers the use of land identified for future urban development, limiting the efficient use of land in the short to medium term • May reduce certainty for landowners and developers regarding the timing of development • Where existing development rights are exercised, land may be developed at lower densities than anticipated, reducing the long-term efficiency of land and infrastructure use **Social costs** • Imposes constraints on landowners by reducing or limiting the development potential of land that is already zoned or expected to be developed • Creates equity issues between landowners where similar land parcels are treated differently in terms of development potential	**Environmental benefits** • Restricts the extent of land available for development in the short term, limiting the immediate environmental footprint of urban expansion • Retains larger areas of rural and rural residential land for future comprehensive planning and development • Supports the ability to achieve integrated environmental outcomes across the full MMP area in the longer term **Economic benefits** • Provides a significant level of potential development capacity over the longer term • Retains land for more efficient future urban development, avoiding fragmentation into low-density lifestyle blocks • Allows infrastructure planning and investment to be staged over time • Maintains flexibility to bring forward additional land as infrastructure becomes available **Social benefits** • Provides for a staged approach to growth, with development focused in existing urban areas in the short term • Retains additional land for future development, allowing growth to occur progressively over time	**Effectiveness** Under this option, existing urban areas are zoned for development as identified in PC81, while rural residential and rural zoned land is retained as Future Urban Zone or in its existing rural zoning for longer-term development. This option is effective in identifying the full spatial extent of future growth and in signalling the long-term development structure of Māpua, consistent with the Māpua Masterplan. In that respect, it gives stronger effect than Options 1 and 2 to the longer-term planning outcomes sought by PC81, including the objective of providing a well-functioning urban environment over time through a planned urban form. It also better supports the intent of the NPS-UD by protecting future development opportunities and avoiding the progressive foreclosing of long-term urban outcomes. The use of a Future Urban Zone is also effective in principle because it helps maintain the availability of land for future urban purposes, rather than relying only on short-term serviced sites. This better supports the long-term resilience of the settlement and is more consistent with operative Objective 13.1.2.2, which requires land development, including supporting infrastructure, to be resilient to natural hazards. In the Māpua context, where the coastal inundation assessment demonstrates that large parts of the lower coastal plain become increasingly exposed to inundation over time, an approach that retains more resilient long-term growth locations has a stronger strategic basis. However, the effectiveness of this option is constrained by the extent to which the intended zoning pattern can actually be secured in practice. While it identifies future urban land, it also relies on limiting or reducing the development potential of land that is already zoned Rural or Rural Residential, or expected by landowners to develop in that way. This creates uncertainty as to whether the long-term structure can be maintained. If those areas continue to be subdivided or developed for low-density lifestyle use, the intended future urban framework may be progressively undermined.

	• May reduce confidence in the planning framework where existing zoning expectations are not maintained **Cultural costs** • May limit the ability to implement cultural outcomes across the full extent of the Māpua Masterplan area in the short term • Creates uncertainty regarding how and when cultural values will be integrated into future development areas • May not fully reflect the outcomes of previous engagement processes where development expectations have been established	• Supports a planned and coordinated pattern of development consistent with the Māpua Masterplan **Cultural benefits** • Retains land for future development, allowing cultural values and outcomes to be incorporated through future planning processes • Provides the opportunity to achieve cultural outcomes across a wider area over time, consistent with the Māpua Masterplan • Supports a coordinated approach to development that can integrate cultural values at a broader scale	This is important because the option's effectiveness depends not only on identifying future urban land, but on avoiding development patterns that foreclose those future opportunities. If that cannot be achieved, the option may only partially deliver the planned long-term urban form. It is therefore more effective than Options 1 and 2 in strategic planning terms, but less certain than Option 4 in achieving the full intended outcomes. When assessed against the operative TRMP objectives, this option supports Objective 6.2.2.2 by seeking to retain opportunities for more efficient future use of land and infrastructure, and supports Objective 13.1.2.2 by better maintaining resilient long-term growth options. It also aligns more closely than Options 1 and 2 with the PC81 objectives relating to planned urban form and well-functioning urban environments. However, its effectiveness remains contingent on whether the future urban structure can be protected in practice. **Efficiency** This option is efficient in principle because it seeks to retain land for future urban development while limiting short-term development to existing urban areas. This helps avoid inefficient low-density subdivision of land that may be needed for urban purposes in the future and allows infrastructure planning and investment to be staged over a longer timeframe. In that sense, the option is more efficient than Options 1 and 2 in long-term strategic terms, because it better preserves future urban development opportunities and reduces the risk of irreversible land use decisions that would undermine the long-term spatial outcomes of the Māpua Masterplan. It also aligns more closely with the NPS-UD direction that urban development should be planned in a way that supports well-functioning urban environments over time, including in response to changing circumstances and future needs. However, the efficiency of the option depends on whether the zoning approach is actually implemented and maintained as intended. If existing development rights are exercised on land intended for future urban use, or if low-density rural residential development continues in those areas, then

			future opportunities for efficient urban development may still be lost. In that scenario, the settlement may still experience fragmented land use patterns and a reduced ability to achieve efficient infrastructure use over time. This creates an important practical limitation. While the option is efficient in concept, its efficiency is dependent on outcomes that may not be fully achievable through the zoning structure alone. It therefore carries a risk that the administrative and strategic effort involved in establishing the Future Urban Zone does not fully translate into the intended long-term land use outcomes. Compared with Option 4, the option is also less efficient because it may still require further plan changes or additional interventions in the future to bring land forward for development or to respond to land use outcomes that are not consistent with the intended structure. By contrast, Option 4 provides a more complete and enduring framework from the outset. Overall, this option is more efficient than Options 1 and 2 in protecting long-term urban development opportunities, but less efficient than Option 4 because its success depends on a future zoning pattern that may be more vulnerable to being undermined in practice.

Economic Growth and Employment	**Economic Growth**	**Employment**
	Under this option, development capacity is identified across the full extent of the MMP area, but enabled only within existing urban-zoned with remaining areas retained for future development. This approach provides for a significant level of potential long-term economic growth, as it identifies and retains land for future urban development. It supports a structured and planned pattern of growth consistent with the MMP. However, in the short to medium term, economic growth is constrained by the limited amount of land available for development. Investment and development activity is focused on a relatively small number of sites, reducing the scale and continuity of economic activity.	Employment under this option is primarily generated through development within existing urban-zoned areas. This provides short to medium-term employment opportunities associated with construction activity. However, the scale and duration of employment is limited by the extent of land available for development. The retention of land for future urban use delays the potential for additional employment associated with larger-scale development, increased population, and expansion of local services and businesses. Where development occurs in a manner that is inconsistent with the intended long-term structure, employment outcomes may also be less efficient or more dispersed than anticipated.

	The separation between zoned and future development areas also means that broader development opportunities are deferred. Where development does occur within retained rural residential areas, this may not align with the intended urban structure, reducing the efficiency of land use and limiting longer-term economic outcomes.	As a result, while the option provides for longer-term employment potential, employment growth in the short to medium term is more limited and uncertain.

Table 28.6: Assessment of Option 4

MAPUA OPTION 4	Costs (environmental, economic, social, cultural)	Benefits (environmental, economic, social, cultural)	Effectiveness and Efficiency
Zone all identified sites for urban development and manage the timing and extent of development through deferred provisions and infrastructure-linked planning controls.	**Environmental costs** • Creates potential for development to occur across a wider range of sites before all long-term environmental outcomes are fully implemented or integrated • Relies on development staging occurring in practice, meaning environmental outcomes associated with coordinated development may be achieved over time rather than upfront **Economic costs** • Enables more development capacity than is required to meet short and medium term demand, which may result in an oversupply	**Environmental benefits** • Enables more efficient use of land by supporting higher-density urban development rather than low-density lifestyle subdivision • Avoids the fragmentation of rural residential land into lifestyle blocks, helping to retain land for more integrated and comprehensive urban development in the future • Provides the opportunity to achieve the full range of environmental outcomes identified in the MMP over time **Economic benefits** • Maximises the efficient use of land and infrastructure by enabling development at urban densities across the full	**Effectiveness** Under this option, all identified sites are zoned for urban development, with the timing and extent of development managed through deferred provisions, infrastructure-linked constraints, and supporting rules and policies. This option is highly effective in enabling development capacity across the full extent of identified growth areas, consistent with the spatial framework of the Māpua Masterplan. It ensures that sufficient development capacity is available to meet demand over both the short and long term, while maintaining flexibility in how and where development occurs. By enabling a broad range of sites, the option allows development to respond to market demand and infrastructure availability, rather than being constrained to a limited number of predetermined locations. This provides a responsive supply of development capacity and supports a competitive land market, which is consistent with the requirements of the NPS-UD to provide sufficient and responsive development capacity that contributes to well-functioning urban environments. The option is also the most effective in giving full effect to the long-term spatial outcomes identified in the Māpua Masterplan and the FDS. Unlike Options 1 and 2, it avoids the need to select specific sites, and unlike Option 3, it does not rely on future controls to secure the long-term urban structure. Instead, it both identifies and enables the intended urban form from the outset, while managing its delivery through infrastructure constraints and sequencing mechanisms. Importantly, this option is also the most effective in supporting long-term resilience. By zoning all identified growth areas, including those located on more elevated land, it protects and enables the long-term growth pattern that is less exposed to coastal hazards. The coastal inundation assessment demonstrates that large areas of the coastal plain are increasingly affected by sea level rise over time, while some of the identified growth areas remain less exposed. By retaining the full spatial

	of zoned land relative to immediate need • Requires ongoing management of infrastructure capacity through planning provisions and infrastructure planning processes • Results in uncertainty regarding the timing and location of development, which may affect infrastructure investment planning and sequencing **Social costs** • Does not provide precise control over the location and timing of development, which may result in uneven patterns of development over time • May result in development occurring across a number of sites simultaneously, rather than in a clearly defined sequence • Requires reliance on plan provisions and infrastructure constraints to manage development outcomes,	extent of identified growth areas • Avoids the loss of development capacity through low-density lifestyle subdivision, maintaining the long-term availability of land for more efficient urban use • Provides flexibility for development to occur across a range of sites, supporting a more resilient and responsive housing market • Reduces the need for future plan changes to enable additional capacity, supporting a more efficient long-term planning approach **Social benefits** • Provides the greatest level of housing supply and choice, supporting a range of housing typologies and locations • Enables development to respond to market demand, allowing sites to come forward where and when they are viable • Supports a more continuous supply of housing over time,	framework, the option avoids foreclosing more resilient development opportunities and better achieves operative Objective 13.1.2.2, which requires land development and supporting infrastructure to be resilient to natural hazards. Infrastructure constraints, including those associated with wastewater, water supply and transport networks, provide practical limits on the rate and location of development. Through the combined operation of zoning, rules and policies, development is allowed to proceed where infrastructure is available and constrained where it is not. This provides an effective mechanism for managing development while still enabling capacity. While the sequencing of development is not prescribed in a deterministic way, this reflects the intended operation of a responsive planning framework rather than a limitation. The option enables development to occur where infrastructure capacity and market demand align, which is consistent with both the NPS-UD and the PC81 objectives relating to well-functioning urban environments. Overall, this option is the most effective at achieving the combined objectives of PC81, the NPS-UD, and the operative TRMP, by providing sufficient and responsive capacity, enabling planned urban form, and supporting resilient long-term development outcomes. **Efficiency** This option is efficient because it enables development capacity across a broad range of sites, allowing infrastructure capacity to be utilised where and when it is available. By avoiding the need to select specific sites for development, the approach reduces the risk that infrastructure capacity is underutilised or taken up in unintended locations. It allows development to occur in response to both servicing availability and market demand, improving the efficiency of land and infrastructure use across the settlement. The option is also efficient in that it provides a durable and comprehensive planning framework. By zoning all identified growth areas and managing development through staging and infrastructure-linked constraints, it avoids the need for further plan changes to enable additional capacity over time. This reduces administrative costs and provides greater certainty for both the Council and landowners. Unlike Options 1–3, this option also avoids inefficient land use outcomes associated with the continued subdivision of rural residential land for low-density lifestyle development. By enabling

	rather than predetermined staging **Cultural costs** • Relies on planning provisions and development processes to incorporate cultural values across multiple sites over time • Outcomes are influenced by the timing and pattern of development, which is not fully predetermined although align with the spatial planning for the area.	reducing the risk of constrained supply **Cultural benefits** • Enables cultural values and outcomes to be integrated across a broader development area over time • Avoids piecemeal development patterns, supporting a more coordinated and considered approach to growth aligned with the spatial plan for Māpua.	higher-density urban development across the full Māpua Development Area, it retains opportunities for more efficient urban use of land and infrastructure, consistent with Objective 6.2.2.2 of the TRMP. From a long-term perspective, this option is also the most efficient in supporting resilience. By preserving and enabling the full spatial pattern of growth, including more resilient locations, it avoids the risk of irreversible land use decisions that would limit future urban development options or require costly adaptation to natural hazards. This aligns with both Objective 13.1.2.2 and the broader direction of national guidance on climate change and coastal hazards. While development does not occur in a fixed or predetermined sequence, this does not reduce efficiency. Rather, it reflects a flexible and adaptive approach that allows infrastructure delivery and development demand to align over time. Infrastructure constraints and investment timing continue to moderate the rate and spread of development, ensuring that growth remains coordinated with servicing capacity. Overall, this option is the most efficient because it provides a flexible, integrated and enduring framework for managing development, avoids unnecessary duplication of planning processes, supports efficient land and infrastructure use, and enables the settlement to respond to both current demand and long-term change.

Economic Growth and Employment	**Economic Growth**	**Employment**
	Under this option, development capacity is enabled across all identified growth areas, with development occurring over time in response to market demand and infrastructure availability. This approach supports a higher and more sustained level of economic growth. Enabling development across a broad range of sites allows construction activity to continue over a longer period, supporting the building sector and associated industries. The availability of a larger pool of development capacity also supports investment across multiple sites, rather than being concentrated in a limited number of locations. This provides flexibility for development to occur where it is viable, supporting a more responsive and resilient local economy. The progressive increase in population associated with this level of development also supports the expansion of local services and	Employment effects under this option are more substantial and sustained than under the other options. The enabling of development across all sites supports ongoing construction activity over a longer period, providing continued employment opportunities for contractors, trades, and suppliers. This reduces the risk of interruptions in development activity associated with reliance on a limited number of sites. As population increases, additional employment opportunities are also supported through the expansion of local services, businesses, and community facilities. This contributes to longer-term employment growth within Māpua. However, employment outcomes are influenced by the timing and distribution of development, which is not fully predetermined. Employment growth is therefore expected to occur progressively over time, reflecting the way in which sites come forward in response to market demand and infrastructure constraints.

	businesses over time, contributing to broader economic activity within Māpua and its role within the Tasman urban environment.	

Overall Evaluation and Conclusion

Statutory Analysis

The NPS-UD provides the statutory framework for assessing the appropriateness of the options. All options can provide a level of development capacity and can be aligned with infrastructure constraints in a general sense. The key issue is how effectively each option gives effect to the broader intent of the NPS-UD.

The evaluation focuses on those objectives and policies that distinguish between the options, including the requirement to provide sufficient and responsive development capacity, to support competitive land and development markets, and to enable well-functioning urban environments. Of particular relevance are the requirements to provide flexibility in how development occurs, to avoid constraining supply through overly prescriptive zoning, and to ensure that development capacity can respond to market demand and changing circumstances.

NPS-UD Objective 6 states:

Local authority decisions on urban development that affect urban environments are:

(a) integrated with infrastructure planning and funding decisions; and

*(b) **strategic over the medium term and long term**; and*

*(c) **responsive, particularly in relation to proposals that would supply significant development capacity.***

In the context of Māpua, this includes recognising the limited availability of developable land, the long-term implications of sea level rise, and the need to retain flexibility to respond to changing environmental and demographic conditions. The MMP and the FDS provide the framework for achieving these long-term outcomes.

Of the options considered, Option 4 most effectively gives practical effect to this objective. It enables the full spatial framework to be realised while retaining sufficient flexibility to respond to infrastructure constraints and future change. In contrast, Options 1 and 2 only partially implement the long-term spatial framework and rely on a limited number of sites to deliver development capacity. This creates a risk that the long-term outcomes are not realised in practice, particularly where existing zoning enables development to occur in a manner that is inconsistent with the intended urban structure. As a result, these options may allow the long-term vision to be progressively undermined over time, rather than secured.

In the context of Māpua, these requirements must also be considered alongside the need to provide for long-term resilience to natural hazards, particularly coastal inundation and sea level rise. This is reflected not only in NPS-UD Policy 1(f), but also in operative TRMP Objective 13.1.2.2, which requires that land development and supporting infrastructure is resilient to natural hazards. Accordingly, the evaluation must consider not only short- and medium-term capacity, but whether each option preserves and enables development in locations that can support resilient long-term urban outcomes.

Policy 6 of the NPS-UD requires planning frameworks to support competitive land and development markets. This includes providing a range of development opportunities and avoiding unnecessary constraints on the location and timing of development. In this context, options that enable development across multiple sites and allow the market to determine where development occurs are more consistent with Policy 6, as they support flexibility, choice, and responsiveness. Options that limit development to a small number of sites or seek to predetermine development locations may constrain the functioning of the land market, even where overall capacity appears sufficient.

NPS-UD Policy 1: *Planning decisions contribute to well-functioning urban environments, which are urban environments that, as a minimum:*

(a) have or enable a variety of homes that:
(i) meet the needs, in terms of type, price, and location, of different households; and
(ii) enable Māori to express their cultural traditions and norms; and
(b) have or enable a variety of sites that are suitable for different business sectors in terms of location and site size; and
(c) have good accessibility for all people between housing, jobs, community services, natural spaces, and open spaces, including by way of public or active transport; and
(d) support, and limit as much as possible adverse impacts on, the competitive operation of land and development markets; and
(e) support reductions in greenhouse gas emissions; and
(f) are resilient to the likely current and future effects of climate change.

In the context of Māpua and NPS-UD Policy 1, these considerations are particularly relevant given the limited availability of developable land and the long-term pressures associated with sea level rise and changing settlement patterns. Options that allow existing rural residential land to be fragmented through low-density development risk constraining the ability of the settlement to adapt over time and may reduce the opportunity to achieve a more efficient and integrated urban form in the future.

Both Options 3 and 4 are more consistent with Policy 1 in this regard, as they seek to retain land for future urban development and avoid the loss of that land to inefficient and irreversible patterns of subdivision. In doing so, they better support a flexible and adaptive urban environment that can respond to future change. However, Option 3 relies on downzoning or constraining land that is already zoned or expected to be developed, which introduces significant challenges in terms of implementation, landowner expectations, and overall feasibility. As a result, while it aligns well with the intent of Policy 1 in principle, it is less likely to achieve those outcomes in practice. Option 4, by contrast, provides a more deliverable framework, enabling development to occur while still retaining the ability to achieve long-term outcomes over time, and is therefore the most appropriate option overall.

The NPS-UD therefore requires not only the provision of sufficient development capacity, but a planning framework that is responsive, achievable, and capable of supporting long-term urban outcomes which Option 4 has regard to.

Evaluation of Options

The following table 28.7 summarises the relative performance of the options, having regard to their ability to deliver long-term strategic outcomes, their practical ability to implement, and their overall consistency with the planning framework.

Table 28.7 Evaluation of Options

Option	Long-term strategic alignment (NPS-UD Objective 6, FDS and MMP)	Deliverability / feasibility	Overall
1	Provides limited capacity and does not fully enable the long-term spatial framework	Relies on a small number of sites and creates a high risk of under-delivery	Not preferred

2	Only partially implements the long-term spatial framework and allows legacy zoning to undermine future outcomes	Predetermines development locations and is not well aligned with market delivery	Not preferred
3	Strong alignment with long-term strategy and protects land for future development	Relies on downzoning and is unlikely to be implemented in practice	Not preferred
4	Best enables the full spatial framework and supports long-term resilience and adaptation	Provides a realistic and flexible framework that can be implemented in practice	Preferred option

Overall, Option 4 is the most appropriate option when assessed against the requirements of section 32(1)(b). While Options 1 and 2 provide a degree of development capacity, they only partially implement the long-term spatial framework and create a risk that those outcomes are undermined over time through the continuation of existing zoning patterns and the loss of strategically important land to low-density development. Option 3 more fully aligns with the long-term strategy and better protects future development opportunities, but it relies on zoning changes and constraints that are uncertain to achieve in practice.

Option 4 best balances these considerations. It enables the full spatial framework identified in the MMP and FDS, provides sufficient and responsive development capacity consistent with the NPS-UD, and preserves opportunities for more resilient long-term development in accordance with TRMP Objective 13.1.2.2. By combining enabling zoning with infrastructure-linked constraints and staging mechanisms, it provides a flexible, deliverable, and enduring framework for managing urban growth.

For these reasons, Option 4 is the most appropriate way to achieve the objectives of PC81, having regard to the NPS-UD, the operative TRMP objectives, and the long-term needs of the Māpua community.