

To: Tahimana Limited

From: Staig & Smith, Jackie McNae

Date: 19th of December 2025.

Subject: **Planning Memorandum in relation to a referral application for fast track by Tahimana Limited**

1.0 INTRODUCTION

- 1.1 We have been asked to provide a planning summary in relation to the Tahimana referral application for Fast Track. The site for the proposed subdivision is located adjacent to Stagecoach Road, with the western boundary of the property fronting State Highway 60. The site is situated between Mapua/Ruby Bay and Tasman townships.
- 1.2 In summary, the proposal seeks to Subdivide the property into 141 Residential and Lifestyle allotments each to be developed with a dwelling , together with provision for roading, a community wastewater system for the residential allotments to connect into, a public reticulated water scheme for the residential allotments, a Reserve, and a range of cycleway and walkways within the development connecting to external walkway and cycleways within the locality. The site includes a large number of small, degraded, wetlands and the development proposal includes the protection and revegetation of these wetlands as well as the margins of watercourses within the site.
- 1.3 This document provides a summary of the following matters:
- (a) Overview of the application site, its surrounds and zoning context and Policy Framework for the Rural 3 Zone.
 - (b) Summary of potentially applicable resource consent requirements, under all relevant statutory documents.
 - (c) An Assessment of Effects (at a level suitable for a referral application); and
 - (d) Consideration of the most relevant National and Regional planning documents.

2.0 SITE DESCRIPTION

- 2.1 The Application site is made up of 3 parcels of land, Lot 1 DP450728 and Lot 3 DP450728 comprising a combined area in the Applicants ownership of 68ha, with the third parcel of land being Section 34 SO440217 comprising 2.78ha, which is Crown land administered by NZTA. The Applicants have an agreement with NZTA that a Licence to occupy this area of land will be entered into once Consent is granted to the development. The Licence to occupy land area will provide a portion of the land area necessary for the disposal of treated wastewater.
- 2.2 The site is of variable contour ranging from 45 metres above sea level to 107 metres above sea level, affording a range of Coastal, mountain and rural views.
- 2.3 The landform is comprised of a series of moderately sloping ridges/ spurs and gullies. The land adjoining Stagecoach Road is the most elevated, with a local ridgeline/spur leading down from Stagecoach Road towards the north dividing the site into two catchments. The catchment to the east, includes a range of small ridges/spurs, and gullies, the waterways and small wetlands drain to a large wetland on a neighbouring property to the east. This catchment is to be utilised for lifestyle allotments and a Rural conservation allotment with built development located on the more elevated spurs setback from the wetland and waterway areas.
- 2.4 The catchment to the west opens into a landform shaped as a *Basin* with a series of small ridges /spurs and gullies containing waterways and wetlands draining to a larger wetland straddling the boundary to the north. This western catchment is to be used for 5 clusters of Residential development on the moderate sloping spurs, with the remaining area utilised for a Rural conservation allotment containing the wetlands and waterways, and some lifestyle allotments.
- 2.5 The history of land use has been exotic forestry and extensive grazing. The land is currently pasture and leased for grazing; there is no irrigation or source of water available at this location for irrigation for the land.

3.0 BACKGROUND

- 3.1 The subject land has some Resource Consent history. In 2007 Consents were granted for the subject land and adjoining land around Westmere Drive to be subdivided under the Rural 3 Zone provisions for a 113-allotment subdivision. This Consent was not given effect to on the subject land and lapsed in 2017. The land was sold by the original Consent holders with the subsequent landowner applying for Consent to separate out the Tahimana land onto a separate title and then pursued a varied subdivision layout for the remaining area of land in the Westmere Drive locality for a 45 lot Subdivision.
- 3.2 In the subject locality there are a number of Rural Residential lifestyle developments that have been consented and completed within the Rural 3 Zone. To the North east of the Site is a proposed Rural 3 Subdivision of 66 allotments which has reached the stage of a hearing.

4.0 RURAL 3 ZONE OVERVIEW, RELEVANT OBJECTIVES AND POLICIES

- 4.1 The Tahimana site is zoned Rural 3. This zone was introduced into the TRMP to specifically enable opportunities for residential and lifestyle development, while retaining the wider zone's overall rural amenity values and character, including natural character, and ongoing opportunities to utilise land where it is of high productive value, while seeking to retain cultural values, remnant coastal vegetation, streams and wetlands. The Rural 3 zone was a response to the significant demand to live in the Coastal Tasman Area and an attempt to steer this demand away from the more productive Rural 1 and Rural 2 zones.
- 4.2 In particular, the zone seeks to enable residential and rural residential development to take place between December 2003 to 2023 (at least) that "generally reflects a ratio of 25 percent developed area to 75 percent open space or unbuilt area", however the level of development is presently well under that ratio. The project will contribute to achieving the desired ratio.
- 4.3 The following key Objectives and Policies illustrate how the project contributes to the implementation of the Rural 3 Zone Planning Framework, the delivery of infrastructure and an increase in housing supply and housing choice at a scale of regional significance.

Objective/Policy Number	Objective/Policy Wording	Assessment
Objective 5.4.3.1	To enable a variety of housing types, recognising different population growth characteristics, age, family and financial circumstances and the physical mobility of, or care required by, residents.	The subdivision design provides opportunities for a variety of housing densities, providing choice. The development provides opportunities for people and families of different ages and different socio-economic groups, as well as potentially different care requirements, through the opportunity of incorporating within a dwelling two housekeeping units.
Policy 7.3.3.1	To identify an area (Rural 3 Zone) within the Coastal Tasman Area within which rural residential and residential development is enabled while avoiding, remedying and mitigating adverse effects on the environment.	The project implements this Policy by providing for both residential development, some 98 residential allotments as well as 41 Rural Residential lifestyle allotments, reflecting the policy seeking to provide for a choice of densities of development both residential and rural residential.
Policy 7.3.3.3	To ensure that the valued qualities of the Coastal Tasman Area, in particular rural and coastal character, rural and coastal landscape, productive land values, and the coastal edge and margins of rivers, streams and wetlands are identified and protected from inappropriate subdivision and development.	The site is not in the Coastal Environment but has coastal views. The property has very limited productive land values as noted in the expert assessments on productivity. The water courses and wetlands have been identified, mapped and will be restored and protected from subdivision and development within the Applicant's proposal.
Policy 7.3.3.7	To enable residential and rural residential development to take place from December 2003 over at least a 20-year period in the Rural 3 Zone and the Waimea Inlet Rural Residential Zone that generally reflects a ratio of 25 percent developed area to 75 percent open space or unbuilt area across the total area of both zones.	The project implements this Policy by providing for both residential and rural residential development. The Policy seeks to achieve a ratio of 25% developed area with 75% unbuilt, for the overall zone. The project has a ratio of 25% built space to 75% unbuilt space within their development which achieves the growth ratio sought by this Policy.
Policy 7.3.3.9	To ensure that residential and rural residential development within the Coastal Tasman Area is able to connect to reticulated water supply services provided by the Council within two decades.	The Applicants propose to extend the Council's reticulated water supply to the subject land and will install a large water tank to provide a reticulated water supply to all residential allotments.

Policy 7.3.3.11	To improve access and progressively upgrade roads throughout the Coastal Tasman Area in accordance with development, while avoiding or mitigating adverse effects on landscape, natural character and amenity.	Stagecoach Road will be upgraded from the end of the existing seal, 650m from the State Highway 60 intersection. The road beyond this point is a gravel road deteriorating to a dirt track which will be upgraded to a sealed standard including provision for a cycleway/ walkway, meeting Council's Rooding Standards. This upgrade of Stagecoach Road will have benefits for the new subdivision as well as significant public benefits as 1.7km of Stagecoach Road to the south of the subject property is a poor quality gravel/dirt road which will be upgraded, as will the full frontage of Stagecoach Road through the development site, a further kilometre of upgrade. This will benefit those existing properties adjoining gravel sections of Stagecoach Road and the numerous people that utilise this corridor as a part of the wider walkway/cycleway networks within this part of the district.
Policy 7.3.3.15	To support proposals to restore, enhance or protect natural features and areas such as wetlands and coastal indigenous vegetation, with weed control and indigenous plantings appropriate to the area, as part of subdivision and development design in the Coastal Tasman Area.	The project specifically implements this policy which supports proposals to restore, enhance and protect wetlands. The wetlands have been mapped, the values assessed and proposals for restoration planting of wetlands and waterways confirmed. Further, the Application has set out the measures for ongoing protection of the wetlands and restoration planting through recommended Consent Notices requiring the ongoing implementation of the management and maintenance plans for the wetlands. The implementation of this Policy has regional benefit.
Policy 7.4.3.11	To enable the subdivision of land for conservation or protection of features or resources that particularly contribute to the rural character of the area.	The proposed subdivision includes two Rural Conservation allotments where the majority of wetlands are located. All wetlands are to be protected and enhanced with restoration planting with an appropriate management and maintenance plan in place which will be implemented through Consent Notices on relevant titles.
Policy 7.3.3.22	To avoid adverse off-site effects, including cumulative effects and water contaminations effects, resulting from the disposal of domestic wastewater to land arising from inappropriate scale, design, or location of subdivision and development of land for residential purposes in the Wastewater Management Area.	101 allotments, 98 of which are residential in size, will be connected to a communal wastewater system that will be designed and constructed to Council Standards at the developer's cost, facilitating the delivery of infrastructure.

4.4 Within the Tasman Resource Management Plan (TRMP) there are a range of additional Objectives and Policies of relevance under Chapter 8, which deals with margins of water bodies including wetlands. This reiterates the Policies highlighted above from Chapter 7, which seek the protection and restoration of wetlands and, where appropriate, public access. The specific Land Transport Objectives and Policies from Chapter 11 of the TRMP are relevant in terms of delivery of infrastructure that will be facilitated through the project. The Land Transport Objectives and Policies seek to ensure that roading is of a suitable standard for increases in traffic, with an emphasis on provision and facilitation of cycle trails and walkway links promoting choice between utilising roads, walkways and cycleways for different modes of transportation. The project aligns with these Objectives and Policies for transportation infrastructure.

4.5 The above sets out the Policy framework for the Rural 3 Zone, the relevant rules for which are summaries in the Table below. The site is within the Land Disturbance Overlay Area 1 which relates to the more stable land in the district, whereas the

Land Disturbance 2 Zone covers land at greater risk of instability. The Table in Section 4.0 highlights the Rules.

- 4.6 The site is within the Wastewater Management Area Overlay that applies to all land within the Coastal Tasman Area and the Table in Section 4.0 highlights the relevant Rules.
- 4.7 The Coastal Tasman Area, which includes the Application Site, is subject to the Coastal Tasman Area Subdivision and Development Design Guide, this design guide divides the Coastal Tasman Area into Landscape Units. The subject land sits within the Inland Tasman Landscape Unit 6B Beulah Ridge, a landscape unit described as having considerable potential for cluster like development and describes that there is potential for rural village concepts as standalone developments or integrated development with cluster or similar concepts.

5.0 APPLICABLE RESOURCE CONSENTS

5.1 Based on our review of the Project the works will trigger requirements for resource consents for the following activities:

- Subdivision Consent
 - Land Use Consent for dwellings and Network Utility –Water tank.
 - Land Disturbance Consent for Earthworks.
 - Discharge Consent for stormwater to settlement ponds to discharge to land and water during construction, and to discharge and divert stormwater from the subdivision and developed sites to land and water with a portion of water to go to detention ponds.
 - Discharge Consent to freshwater.
 - Discharge Consent for wastewater to land from a communal wastewater system for the residential allotments. As well as Discharge Consents for individual on site wastewater systems for Lifestyle allotments.
 - Consents under the NES for Freshwater associated with Earthworks and vegetation clearance, construction of a Boardwalk over a wetland, creation of stormwater detention dams within 100m of wetlands where there is a hydrological connection to wetlands.
- 5.2 Below is a summary of the relevant rules under the NES for Contaminated Land, under the Tasman Resource Management Plan (TRMP) and the NES -Freshwater setting out the rules and regulations that trigger consents.

Relevant plan / standard	Relevant rule / regulation	Reason for consent triggered or not	Activity status	Location of proposed activity	Other comment
National Environmental Standards					
Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011 ("NESCS")	R8(4)	A PSI has been undertaken by Martyn O'Cain of Envirolink , a qualified and experienced practitioner , who has concluded following his site visit , review of the history of land uses and sampling on site that there are no previous HAIL activities on site and that it is highly unlikely that there will be a risk to human health if the activities proposed by the development proceed. His conclusion is that Resource Consent is not triggered.	Permitted Activity	N/A	
National Environmental Standards for Freshwater (NES-F)	Regulation 42	Boardwalks are defined as a wetland utility structure. There will be one boardwalk crossing a wetland, while there will be no structure in the wetland there will be piles and earthworks within 10m of a wetland.	Restricted discretionary Activity	Constructed over wetland W70 as mapped by RMA Ecology.	
	Regulation 52	Earthworks will take place within 100m of a wetland. The development proposal will not result in the Drainage of a wetland or partial drainage of a wetland as confirmed by the Applicants Project Hydrogeologist. However, the Tasman District Council's Team Leader of Natural Resources is of the view that given the scale of earthworks that it is appropriate to consider the proposal under Regulation 52. As such out of an abundance of caution we flag this as a potential Consent trigger.	Non complying	Applies potentially across the site at any point within 100m of a wetland.	
	Regulation 54	A number of stormwater detention dams are within 100m of a wetland and there will be discharge of stormwater into water within 100m of wetlands where there is a hydrological connection between the damming and discharge of stormwater and the wetland.	Non Complying	Applies potentially across the site at any point within 100m of a wetland	Modelling has been undertaken showing that there will be a change in water level range for the wetlands , however both the Hydrogeological assessment by PDP and the Ecological assessment by RMA Ecology note that overall there will be a benefit to the wetlands from an increase in surface flows to the wetlands.
Tasman Resource Management Plan (TRMP)					
TRMP	16.6.2.1 Network Utilities	Network utility structures proposed include the Water Tank to store water for the reticulated supply to residential lots and the communal wastewater system. There is a limit of 50m2 in area, which both utility structures will exceed.	Restricted Discretionary activity	Lot 146 and Lot 144.	

Relevant plan / standard	Relevant rule / regulation	Reason for consent triggered or not	Activity status	Location of proposed activity	Other comment
TRMP	16.7.3.1 Subdivision CA Rule 16.7.3.3 Subdivision RDA Rule 16.7.3.4 Subdivision DA Rule	The minimum area for a controlled activity is 50ha. As an RDA the standards within the rule are that every allotment intending to be used as a building site has a Building location area identified, this is the case with the subject subdivision. The other standard is that the land has not been the subject of a Subdivision Consent granted after 2003. The subject land was granted a subdivision consent in 2007, but this subdivision consent was never given effect to. There was also a boundary relocation subdivision consent that was given consent to in 2011. The Applicants position is that a lapsed consent would not be relevant to the rule. Further that a boundary relocation is not the type of subdivision that the rule seeks to exclude as the rule seeks to exclude the resubdivision of land that was of a title that was the subject of a previous Rural 3 development .	Restricted Discretionary Activity /Discretionary Activity?	Whole site	
TRMP	17.7.3.1 - Building	Any building erected under the permitted activity rules is not a dwelling . Dwellings are a controlled activity in the Rural 3 Zone. 141 Sites are proposed to have a dwelling erected	Controlled Activity	Dispersed over the site	
TRMP	17.7.3.1 (f) Setbacks	Buildings are setback 10m from a road boundary and 5 m from all other boundaries. The placement of some dwellings on some allotments do not meet all the setback requirements	Controlled Activity	Dispersed over the site	
TRMP	17.7.3.1 (j) Building Location Areas(BLA)	All Buildings are to be located within the BLA identified as part of the Subdivision. The Applicants seek consent to have up to 20% of a building to be able to extend over the delineated BLA. The reason for this is that in our experience it is impossible to provide a BLA shape that will cater to 100% of building designs so there is a need for some flexibility.	Controlled Activity	Dispersed over the site	
TRMP	17.7.3.2 Controlled Activities Building and Use	Consent has been sought for any dwelling erected to have a subsidiary second housekeeping unit.	Controlled Activity		
TRMP	18.5.2.1 Land Disturbance	The earthworks proposed exceed the permitted activity level of earthworks.	Restricted Discretionary Activity		
TRMP	18.8.3 Road Construction standards	Road constructions standards are generally complied with, but the standards the development is adopting are a hybrid standard for the residential cul de sacs where there is not full compliance.	Discretionary Activity		
TRMP	36.1.2.5/36.1.3.2/36.1.4.2 Wastewater discharge is wastewater management area(WMA)	No new Discharges are a permitted activity in the WMA, they are a controlled activity if certain matters are met including a limit of 2m3 per site and a RDA if above 2m3 but subject to a range of standards. Many of the individual wastewater systems on lifestyle blocks will comply as controlled activities however some do not have a full 100% reserve area, and some do not meet all setback requirements or land slope requirements and some of these requirements are repeated in the RDA rule , so they will be non-complying. The Communal wastewater system will be non-complying .	Non Complying.		

Relevant plan / standard	Relevant rule / regulation	Reason for consent triggered or not	Activity status	Location of proposed activity	Other comment
TRMP	36.2.2.3 Discharges to Freshwater	Provides for discharge of sediment or debris from Land Disturbance subject to a range of standards including visual clarity of the receiving body not changing by more than 40% 50m downstream. The earthworks for a temporary period of time are likely to change visual clarity, and while appropriate Erosion and Sediment control will be put in place and actively managed as a precautionary approach Consent should be sought	Discretionary activity		
TRMP	36.2.2.8 Discharge of water into water	The discharge of water into water is a permitted activity provided a range of conditions are met. There will be water discharged to water via stormwater detention basins and via either diffuse discharge or swales to water for stormwater from roofs to gullies and wetlands. In all cases it is the intention of the Applicant to comply with all standards, however through the construction of the stormwater detention basins it is possible that not all aspects will always be complied with in all weather conditions and out of caution consent should be applied for.	Discretionary activity		
TRMP	36.4.2 Discharges or diversions to land or water of stormwater	This is not a permitted activity in the Rural 3 Zone unless it commenced prior to September 1998.	Restricted Discretionary Activity.		

NB: The substantive application will also address all aspects of the proposal that are considered to be Permitted Activities with respect to the above rules.

There is no element of the Applicants proposal that is a Prohibited Activity, either under the TRMP or any NES.

6.0 OTHER APPROVALS

5.1 No other Consenting approvals are necessary, however a Licence to Occupy agreement between the Applicant and NZTA will be required to be entered into in order for the Applicant to occupy Section 34 SO 440127. Consultation has been undertaken with NZTA and they have provided written confirmation to the Applicant that they will grant a Licence to occupy this land once consent is granted.

7.0 ASSESSMENT OF EFFECTS

7.1 The Applicant has received advice from the technical experts referred to below. The following reports are attached to the application:

- (a) 3 Waters Assessment – Envirolink
- (b) Economic Assessment -Economic and Property Research.

- (c) Landscape Assessment and Graphics- RMM Landscape Architects
- (d) Ecological Assessment – RMA Ecology
- (e) Groundwater Assessment- PDP Ltd.
- (f) Natural Hazard and Climate Change Assessment – Swanney Geotechnical and Civil Engineering.
- (g) Traffic Assessment – Traffic Concepts Ltd
- (h) Cultural Values Assessment – Ngāti Rārua, and Cultural Impact Assessment – Ngāti Tama.

7.2 The Applicant has also received the following reports which are not included with the referral application:

- (a) Contamination Assessment – Envirolink Ltd.
- (b) Archaeological Assessment- Amanda Young.
- (c) Land Productivity Assessment – Land Vision.

7.3 The project will have a range of positive effects as follows;

- (i) There will be positive effects for housing supply for the district through the addition of 141 house sites. The range of allotments sizes and locations within the development are designed to cater for a range of demographics and price points, including first home buyers. The Companies involved in the development include an owner of two housing companies, as such this development will not simply be offering sections to the market but will provide for a range of house and land packages catering to a range of demographics, household size and price points.
- (ii) The Tahimana Development has been designed to seek Consent for each property to have the right to develop two household units within the one dwelling structure, with one unit being a smaller subsidiary unit suitable for intergenerational living, potentially an elderly parent or perhaps an adult son or daughter living in the smaller unit saving for their own home, or a live in carer.
- (iii) The Application includes a proposal to upgrade and seal Stagecoach Road, together with the provision for a dedicated walkway/cycleway within the Stagecoach Road corridor and within the development site, providing for positive effects for the users of the road, property owners adjacent to the gravel sections of Stagecoach Road, and for the numerous cyclists and walkers utilising the Stagecoach Road corridor. The public reserve within the Tahimana Development, together with the connecting public walkway/cycleway through the site, will be a positive effect for the resulting Tahimana community and the wider community.
- (iv) The provision of a reticulated water supply to the residential sites within the development will be a positive effect. The water supply will provide for a firefighting supply at this location which is a significant benefit to this area

of the district given the high fire risk in the district regularly experienced through summer periods.

- (v) The Tahimana Development will result in significant positive effects for biodiversity gains through the protection and restoration of the stream and wetland networks through the property.

7.4 The key potential adverse effects are addressed in general below:

(i) **Effects on Productive Values**

The subject land has been assessed by Land Vision Ltd confirming the land is not high quality productive land and does not come under the NPS for Highly Productive Land.

(ii) **Effects on Wetland/Waterway Values**

These values have been summarised by RMA Ecology in their assessment . RMA Ecology has surveyed and mapped all wetlands and waterways and categorised these in terms of the relevant statutory requirements. They have assessed the values of the waterways and wetlands and found that in general these are in a degraded state.

RMA Ecology has considered the adverse effects of the proposed development and concluded that subject to the implementation of their recommendations, all of which are accepted by the Applicant, the effects would either be negligible, nil or there will be a net gain in relation to biodiversity values following the restoration of the wetlands and waterways through the proposed extensive restoration planting.

(iii) **Hydrological Effects**

The hydrological effects have been considered by Pattle Delamore Partners Ltd (PDP) in their Assessment, Their modelling and assessment did not indicate that the development would cause any issues to the overall hydrological functioning of the wetlands and note that Tahimana Ltd have proposed additional management measure to divert some stormwater discharge from roof areas of dwellings towards the heads of wetland areas in the gully systems, and where more intensive residential development is proposed , soakage chambers will be utilised to provide localised groundwater recharge upgradient of wetlands. PDP confirm these measures will be beneficial for retaining recharge for these wetlands.

Overall the groundwater assessment undertaken by PDP indicates the development is unlikely to result in diversion or interception of groundwater, a small increase in catchment throughflow may result, and that the development will not have adverse effects on groundwater, including hydraulically connected wetlands.

(iv) **Effects Arising from Stormwater Management**

Stormwater Management is summarised in the Envirolink Report. Stormwater flows will be managed to predevelopment levels through a number of small dams/detention basins within both the western and eastern catchments ensuring that there will be no adverse effects on wetlands both within the Tahimana site and the wetland on the eastern boundary of the Tahimana site.

The preliminary design and assessment, has detailed stormwater treatment proposals which include grass treatment swales, proprietary pollutant traps and plantings within the detention basins together with the restoration planting adjoining waterways and wetlands.

The proposals for stormwater infrastructure include requirements for ongoing maintenance of this infrastructure, therefore it is proposed that once the subdivision maintenance period has passed, the Applicants will put in place management plans, to be imposed by way of Consent Notice on the relevant allotments containing stormwater basins. These Management Plans will detail requirements for inspections, maintenance works, including remediating any minor defects such as minor scar or exposed geotextile.

Stormwater from roads and driveways will be collected and discharged to the stormwater detention basins with stormwater from roofs of dwellings in residential clusters will be diverted directly into gullyhead wetlands so as to recharge surface and groundwater inputs to these wetlands.

With the implementation of the range of recommendations from the Applicants Engineers, the Ecologist and Hydrogeologist, the effects arising from stormwater management will be less than minor.

(v) Effects from Earthworks

The Applicants have developed a preliminary earthworks model for the proposed subdivision that has been reviewed by the Applicant's specialist advisors including their Geotech Engineer, Ecologist and Landscape Architect.

As with any earthworks there is potential for adverse effects arising from the generation of sediment and dust, this will be addressed through the provision and implementation of a Dust, Erosion and Sediment Control Plan (DESCP) in accordance with the Council Standards. There will be a level of noise and activity associated with earthworks, this will be addressed through compliance with the NZ Standards for Construction Noise.

The Geotechnical Investigation has confirmed that the Moutere gravel soils provide a stable base on which to carryout earthworks, subject to the Geotech's recommendations for the design of cut associated with roads and building platforms, batter heights, and recommendations in relation to fill platforms and requirements for certified fill.

It is accepted that there will be a level of landscape and visual impacts through the earthworks phase but these effects will be temporary in nature and addressed through the sowing of grass and landscape planting.

Subject to the implementation of the recommendations made by the Applicants Advisors, the effects arising from earthworks beyond the temporary effects, will be less than minor.

(vi) Effects from Wastement Management

Wastewater Management from 101 allotments within the development site, which are predominantly residential sized allotments, will be connected to a communal onsite wastewater treatment system. The system will be designed to treat effluent to a high standard and will apply treated effluent to land via sub surface dripper irrigation. Envirolink Engineers have assessed the requirements for the communal system and confirmed suitable area available for the discharge of treated effluent together with a further 50% reserve area for discharge.

The remaining lifestyle and rural conservation allotments will need to provide for onsite wastewater systems designed in accordance with AS/NZS1547:2012.

Envirolink Engineers have undertaken a detailed assessment of both the communal wastewater system requirements and onsite wastewater requirements.. Subject to the implementation of their recommendations the effects of the proposed wastetwater discharges on the environment will be less than minor.

(vii) Impacts from Water Supply

A water supply for the residential portion of the proposed development will be provided through the extension of the Council water supply system. This will involve constructing a 300m³ tank onsite together with a dedicated firefighting water supply. There will be no adverse effects of the provision of the reticulated water supply to the residential allotments, this will provide a positive effect for the residential allotments and the provision of a firefighting supply will have a positive effect for the total Tahimana Development as all allotments will have access to the firefighting supply. Lifestyle allotments within the development will provide for their own domestic water supply, this can be achieved in this environment without significant effects. The lifestyle allotments having access to the firefighting water supply is a positive effect not only in respect of fire risk, but also in terms of reducing the visual impact of structures within the environment, as this supply removes the requirement to provide for up to 48,000lt of water storage per lifestyle allotment to be held as a dedicated firefighting supply.

(viii) Potential Hazard Impacts

The Geotechnical Assessment prepared by Swanney Geotechnical and Civil Engineering assesses the natural hazards arising from geotechnical hazards and flooding. This assessment confirms that the risks from siesmic activity, land instability and flooding is low.

The fire hazard is an ever present risk within Tasman District during drought conditions experienced relatively regularly in summers. Removal of all of the pine trees from the subject site has resulted in the removal of a source of fuel. The other important mitigation/remedial measures for the fire hazard is availability of a reliable water supply which will be provided and control over the species planted within landscaping ensuring that these are predominantly of lower flammability, which is the case with most native species which make up the majority of the proposed planting proposed for the Tahimana site.

Land contamination is a potential hazard on any property previously used for rural production activity. Envirolink has undertaken a Preliminary Site Investigation (PSI) which did not identify any hazardous activities that have, or are likely to have been undertaken, as listed on the HAIL.

(ix) Transportation Effects

Traffic Concepts Ltd has undertaken a Transportation Assessment. This Assessment confirms the relatively close proximity of the subject development to the settlements of Tasman Village and Mapua. The Transportation Assessment confirms the proposed road upgrade of Stagecoach Road, to a fully sealed road with provision for a walkway/cycleway within the road reserve together with an additional walkway/cycleway to be developed through the proposed subdivision connecting into a range of walkway and cycleway trails adjoining the development.

As a result of the Tahimana Development, there will be a significant upgrade to the roading infrastructure and walkway and cycleway infrastructure in this locality which will be a positive effect on the environment.

While it is acknowledged that the proposed development will significantly increase the traffic movements on Stagecoach Road, the proposal to upgrade this road, together with the provisions for alternative transport modes for walking and cycling, will ensure that the proposed development is well within the capacity of the proposed upgrade.

(x) Visual & Landscape Effects

The Landscape Assessment prepared by RMM Landscape Architects concludes that the Tahimana project will have low-moderate visual effects, which will lessen as mitigation and enhancement planting grows, and will have a low-moderate degree of adverse effect on landscape values of the site and its receiving environment. These adverse effects have to be considered alongside the moderate-high positive effects that arise for the environment due to the revegetation of the gullies and wetlands and the proposed recreation connections for walking and cycling and the addition of a proposed local purpose reserve.

(xi) Effects on Character & Amenity

There will be a significant change in the character of the subject land but that is in the context of the land being zoned Rural 3, where there is a clear expectation and anticipation within the TRMP Policy Framework that there will be change within the zone reflecting an overall zone ratio of 75% of the land being unbuilt with 25% of the land being developed. While there will be a clear change in character, the change is not adverse as it is the anticipated character for the Rural 3 zone. The change in character envisaged by the Rural 3 Zone Policy Framework, including the Coastal Tasman Subdivision and Development Design Guide, anticipates a pattern of development where there are clusters of residential and lifestyle development interspersed with open space/rural character providing for rural production where land has that capability, or being maintained as open space for conservation and rural character values.

In respect of impacts on amenity values, those aspects that relate to visual impacts have been considered in the RMM Landscape Assessment, for those aspects that relate to issues of privacy, the density of development in relation to external neighbours is a relatively low density of development with appropriate separation distances between development on the Tahimana land and adjoining external properties. The more intensive residential cluster development does not adjoin the external boundary.

Overall it is considered that the effects on the environment in respect of character and amenity will be less than minor and there will be positive contributions to character and amenity through the significant enhancement of wetlands and waterways within the site through the revegetation and restoration planting proposed. Further there will be enhancement to the amenities onsite and for those in the surrounding community through the extension of walkway and cycleways, the provision of a Local Purpose Reserve and the sealing of Stagecoach Road removing the existing dust nuisance.

(xii) Effects on Cultural and Heritage Values

There are no recorded Archeological sites on the subject property. The wider locality has cultural significance. The Applicants have proactively engaged in consultation with iwi as is detailed in the record of consultation provided.

The Applicants have obtained a Cultural Values Statement and a Cultural Impact Assessment that contain a range of recommendations and requests for specified conditions. The Applicants have largely responded to those recommendations through volunteering Conditions for an Accidental Discovery Protocol, volunteering a Condition for contractors to be briefed by an iwi Monitor prior to earthworks commencing, a Condition requiring an iwi Monitor for any earthworks undertaken within 10m of waterways or wetlands. The Applicants have committed to ongoing engagement with iwi through provision of all concept design plans and specialist assessments of the project, in addition the Applicants have committed to iwi post Resource Consent, to providing all detailed Engineering Design Plans and Planting Plans, provision of Management and Maintenance Plans for infrastructure and the wetlands. All of these actions align with Te Ao Māori as reflected in iwi Environmental Plans.

7.4 Conclusion on Effects Assessment.

Based on the above assessment the adverse effects on the Environment will be no more than minor and as outlined there are a number of positive effects.

8.0 RELEVANT NATIONAL PLANNING DOCUMENTS

National Policy Documents

8.1 The Project is consistent with relevant national policy documents. The Project requires Consent under the NES -Freshwater as has been detailed. The following sets out an assess of the relevant National Planning Documents.

National Policy Statement on Urban Development (NPS-UD)

8.2 The NPS-UD sets out objectives and policies to ensure urban environments in New Zealand are well-functioning, adaptable, and capable of supporting growth. The subject site is not part of an *Urban Environment*. The NPS-UD does not contain any policies that are of relevance to the subject property.

8.3 National Policy Statement for Indigenous Biodiversity (NPS-IB)

- i. This NPS largely applies to terrestrial indigenous biodiversity. Its policies promoting restoration and increasing indigenous vegetation cover are relevant to natural inland wetlands, otherwise the policies are generally not applicable.
- ii. The site's biodiversity value is largely limited to the existing finger wetlands, small streams, and ponds where there are some very limited areas of low-quality native vegetation providing habitat for some native species. The site does not contain any significant natural areas (SNA).
- iii. The decision-making principles under Clause 1.5 seek to prioritise mauri, intrinsic value and wellbeing of biodiversity and recognising the importance of biodiversity to Māori and the community. The development is consistent with the decision-making principles and the NPS objective because areas with biodiversity value, in the Applicants case wetlands, have been protected through the project design. There will be a significant net gain for biodiversity and mana whenua biodiversity values through the proposals for restoration, protection and ongoing management and maintenance of the wetland and waterway resources.
- iv. There are limited policies of relevance under this NPS as they largely apply to terrestrial indigenous biodiversity, however those that do apply to wetland restoration being Policies 13 and 14 are implemented through the development as the proposed development results in a biodiversity net gain through the restoration of wetlands.

8.4 National Policy Statement for Freshwater Management

- i. The existing wetlands onsite have been assessed by the Applicant's Ecologist confirming that the wetlands and waterways on the subject site are in a degraded state, and that notwithstanding the degradation and poor quality of these freshwater resources, there are still values.
- ii. The project will protect and restore the freshwater values through keeping all development out of the wetlands and waterways and ensuring appropriate setbacks of development and earthworks from wetlands and waterways, with one minor exception for the piling of one boardwalk across one wetland and piling for boardwalks across stream locations. The piling will be outside the wetlands and waterways but within the 10m setback.
- iii. The project aligns with Policy 1 and Policy 2 as the Applicant has proactively consulted with mana whenua iwi, ensuring their involvement with the concept design and the detailed design to follow. This is evidenced through the assessments undertaken within the Cultural Values Statement by Ngāti Rārua and the Cultural Impact Assessment for Ngāti Tama. The project aligns with Policy 3 as freshwater will be managed on a whole catchment basis,

considering effects on receiving environments (in this case the wetlands and waterways both within the site and external to the site). The project accords with Policy 4, ensuring that post-development peak stormwater flows are matched to pre-development flows, to ensure there are no impacts on downstream flooding. Policy 5 is addressed through the restoration of wetlands and waterways. Policy 6 and 7 are reflected in the project design, as there will be no loss of natural inland wetlands, their values are protected, and the restoration is proposed. In respect of river extent and values there will be no loss of the extent of waterways and the values will be enhanced through restoration planting. In respect of Policy 8, the site does not contain outstanding water bodies. In respect of Policy 9, the habitats of indigenous freshwater species are being protected through setbacks and by the proposed restoration. In respect of Policy 13, this is primarily an obligation on Council, however the Applicant's Ecologist's assessment accords with this Policy by setting out the current condition of the waterbodies and the proposal to reverse the deterioration of the water bodies. The same is the case in relation to Policy 14. In respect to Policy 15 the project enables the wider community to provide for its social, economic and cultural wellbeing by providing for housing in a manner that does not impact on water and wetlands, further the restoration proposals and provision of a public walkway through the development and through the local purpose reserve enables the community to enjoy and appreciate the wetland and waterway values that will be restored.

- iv. The Effects Management Hierarchy in relation to the natural inland wetlands and rivers has been fully assessed and complied with through project design, three waters assessment and design, consideration of natural hazards, the landscape assessment and landscape plans for restoration, the ecological assessment and requirements for protection and restoration, the hydrogeology assessment of impacts on surface water and groundwater, and the cultural assessments.

8.5 **Resource Management (National Environmental Standard for Freshwater) Regulations 2020 ("NES F")**

- i. *Regulation 38 Restoration and Maintenance of Wetlands* – The Applicants propose to restore the wetlands through the removal of weeds and undertaking of restoration planting. This activity is a Permitted Activity.
- ii. *Regulation 42 Construction of Wetland Utility Structures* – A boardwalk is defined as a wetland utility structure. There will be one boardwalk crossing over one of the wetlands. There will be some land disturbance within 10m of the wetland for the boardwalk construction. These two activities trigger Consent as a Restricted Discretionary Activity. There will be no requirement to dam or divert water and there will be no discharge of water related to the installation of the boardwalk structure.
- iii. *Regulation 45 Construction of Specified Infrastructure* – The only specified infrastructure being constructed is a communal water tank as the Applicants assess that their stormwater detention proposals and wastewater infrastructure do not come under construction of specified infrastructure. The water storage communal tank and potentially some of the individual water tanks on individual allotments may be within 100m of wetlands but the proposal will not

- involve any drainage or partial drainage of a wetland and therefore Regulation 45 is not triggered.
- iv. *Regulation 52 Drainage of Natural Inland Wetlands* – The project will not result in any partial or complete drainage of any natural wetland onsite. The Applicants view is that Consents are unlikely to be triggered under this regulation, however the Councils view is that they are, out of caution therefore the Applicants have approached the application on the basis that consent is required under this regulation.
 - v. *Regulation 57 Non Complying, No Other Status* – A number of stormwater detention dams are within 100m of wetlands and there will be discharge of stormwater into water within 100m of wetlands where there is a hydrological connection between the damming and discharge of stormwater and the wetland. Stormwater will be collected from impervious surfaces from roading and driveway areas and directed to stormwater detention basins. The water generated from some building roofs will be collected and directed towards the heads of wetland areas in the gully systems. The stormwater management proposals will result in a redistribution of groundwater and surface water inflows resulting in an increase in surface water and a decrease in groundwater. The modelling carried out by the Applicant's Hydrogeologist confirms there will be a change in the water level range in some of the wetlands within the western and eastern catchments, however both the Hydrogeology Assessment and Ecological Assessment conclude that there is an overall benefit from the increase in surface flows to the wetlands. Notwithstanding the positive benefit of the increase in surface flows to the wetlands, the Regulation notes that where there is a change in the water level range that Consent is triggered.

8.6 **NPS for Highly Productive Land**

The NPS HPL does not apply. The site is zoned Rural 3, and the "nearest equivalent zone" is the "rural lifestyle zone" in the National Planning Standards. As such, the site is not highly productive land, in terms of the transitional definition in the NPS HPL. Additionally, the Applicants have had an expert assessment of the productive values of the land which has confirmed there is no LUC 3 land on the site.

8.7 **Resource Management (National Environmental Standard for Assessing and Managing Contaminants in Soil to Protect Human Health) Regulations 2011**

- i. The preliminary site investigation (PSI) did not identify any hazardous activities that have, or are likely to have been undertaken, as listed on the HAIL.
- ii. The PSI concluded that it is highly unlikely that the proposed subdivision and associated activities (change of land use and land disturbance) would pose a risk to human health. The proposal is a Permitted Activity under the NESCS.
- iii. The PSI confirmed that the risk of contaminated material being buried within the land is low but that this can be managed by implementing an Accidental Discovery Plan during construction. The Envirolink Assessment Report included an Accidental Discovery Plan, and the Applicant accepts that compliance with this Plan this is an appropriate Condition for any Consent issued.