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Re: submission on draft Māpua Masterplan – draft for engagement

Dear Māpua Masterplan team and elected members,

Below is my submission on the Draft Māpua Masterplan (MMP). I have based my submission on the supporting documents, as they offer a more detailed explanation and background to the thinking behind the summary of the Masterplan. The comments made are also applicable to the main summary document. In some case I have referred to comments in other parts of my submission

I have endeavoured to provide specific recommendations, and I trust that both my recommendations and my feedback will be taken into consideration.

I request to allow me to make a verbal submission during the hearing. Although I understand that in general you allow a limited time, I request, given the size of my submission to allow for **30 minutes**.

Summary

Although TDC has responded positively to some of the feedback received there are still major gaps, omissions and insufficient detail for it to be considered as a final draft.

The need for the new greenfield developments is unsubstantiated following more dwellings planned in other areas. The Catchment Management Plan is incomplete and substandard and doesn't discuss the effects of future developments and identify mitigation measures to meet the stormwater aspirations. There is a clear lack of the understanding of water sensitive design which is very likely having an effect on the scope of future developments. There are significant unbudgeted costs resulting from this draft that have not been identified and considered.

TDC has been unprepared to change their mind on many issues raised by me and many of the community and it appears that it is committed to give more weight to a small number of willing landowners.

There is a clear reputational risk to council based on my submission and probably many others and seek that feedback from this feedback process is considered with an open mind.

I recommend that a second draft for feedback is prepared following this round of submissions. It is better to delay and do the planning well first.

If TDC is not prepared to provide a second draft, I request that all feedback received is processed and considered with an open mind and that submitters and elected members are informed on if and why submissions are agreed to or rejected

A. Introduction

- A.1.1. My name is Jan Heijs. I'm a resident of Māpua for just over nine years.
- A.1.2. I'm a recently retired civil engineer and have worked my professional life in and for local government. My area of expertise is in three-waters management including long-term planning and catchment planning and strategy development. In that capacity I have been involved in many planning and land development processes. Before I retired I was, through my employer, instrumental in the development of the Urban Stormwater Strategy and the Stormwater Catchment Management Plan for Richmond, the guidelines for wetlands and bioretention and a review of the stormwater section of the Land Development Manual.
- A.1.3. I'm a member of Nelson Tasman 2050, who will make a separate submission. This is my personal submission.
- A.1.4. Over the last 9 years I have been very active in the local community and also have written articles in the local newspaper, often about the future of Māpua. Based on feedback received, I would like to think that my submission is based on what I think many from our community want Māpua to be.
- A.1.5. It is crucial that the common good takes precedence over individual preferences, often referred to as NIMBY (Not In My Back Yard). Based on feedback I received my submission is grounded in what I believe serves the best interests of our village community.

B. General

B.1. Feedback process.

- B.1.1. Positive observations. It is great to see:
 - that council officers have clearly invested significant effort into the draft Masterplan and supporting documents.
 - that feedback is accepted until February 16, 2025, allowing ample time for reading, digesting, sharing findings, and submitting feedback. So, thank you for that.
 - that TDC has recognized the need for more housing types, specifically more smaller houses.
 - that the zone changes to remove the 'deferred' from the "deferred residential" zones and the changes to require more intensifications in these areas are now combined into one future plan change.
 - that (the improvement of) many walking and cycling connections have been included.

- B.1.2. I provided feedback on the options last year. I was very disappointed to see that hardly any of my feedback is included in the consultation summary document. I'd like to think that most of my comments have been constructive. The only exception is the comments related to the need for more housing choices. I had the same experience with feedback provided on the LTP.
- B.1.3. I'm aware of many residents in Māpua that have given up commenting on the Masterplan (and other feedback processes), because 'council isn't listening anyway' and ask me why I bother. Well, I do!
- B.1.4. It makes me question whether feedback processes are genuine, if they are only considered when they fit the council's narrative, and if the staff is open to new ideas. Is this true local democracy?
- B.1.5. I hope that this time all feedback provided by me and many others is taken seriously with an open mindset.
- B.1.6. The questions in the on-line feedback form are often leading and do not cover the topics I have addressed in my submission. Does the limited scope of these questions really reflect what council is interested in to hear from its community?

Rec. 1. I request that all feedback given is seriously considered with an open mind by staff and elected members

B.2. Masterplan, Future development Strategy and (future) Plan Changes

- B.2.1. When the Future Development Strategy (FDS) was developed, we were told that the FDS would provide strategic direction in relation to the provision for future growth but that every new development still had to be re-justified through a proper RMA process (Plan Change).
- B.2.2. This is confirmed in the current FDS for example on page 16 *"The plans are illustrative only and site boundaries should not be relied upon, since future planning processes, including changes to the Councils' Resource Management Plans and more detailed planning processes (e.g. structure planning), will determine the final approach and extent. There will be further opportunities for engagement and refinement of these areas as they progress through these future planning processes."*
- B.2.3. The FDS is (only) a strategic document (under the LGA) and is revised every three years implying that changes can and will be made.
- B.2.4. Yet, in the context of the current MMP we have been clearly told that the growth as included in the FDS is a non-negotiable starting point.
- B.2.5. The feedback on the options-document last year indicated that the Māpua Community is not in favor of new developments in Seaton Valley. I quote from the consultation report: *"Much of the feedback advocates for minimal to no development in Seaton Valley to maintain the area's rural outlook"*.
- B.2.6. The provision of additional capacity in new subdivisions is not a response to local needs that have been left unaddressed for many years in the past. There is a huge catch-up process needed to provide for the housing types that our local community needs. See #D.15.2 and #I.1.8. This is where the focus should be.
- B.2.7. Māpua should not be used to accommodate out-of-region needs as a priority, which has been the case thus far and which is sometimes suggested by staff and elected

members. Māpua does NOT want to become a suburb of Richmond and does not want to become an unaffordable seaside town.

- B.2.8. Despite all the feedback, the council has proceeded with its plans for greenfield developments in Seaton Valley, that will largely attract out-of-region demand.
- B.2.9. It is clear that the greenfield proposals for Seaton Valley are based on willing landowners and not on a substantiated need and does not respond to the feedback received.

Rec.2. I request that the that the FDS is not used as a non-negotiable starting point, that the need for new greenfield developments is properly (re-)justified considering the additional capacity provided in other already zoned areas (see later) and using a plan-change process and the council keeps an open mind on whether or not any of the proposed area as identified in the FDS are still needed.

C. Te Māpua Masterplan

- C.1.1. I have opted to provide feedback on the ‘supporting information document first’ - because the masterplan is a summary of that and comments on this document will also apply to the main document.

D. The Māpua Masterplan – supporting information - content

D.1. Section 1.0 Introduction

- D.1.1. The introduction begins with the statement, "*The Māpua Masterplan is a comprehensive plan that provides strategic direction on how Māpua will grow and develop over the next 30 years.*" The rest of the text in the introduction is all about growth and very little about anything else.
- D.1.2. The word ‘urban’ is often used in the text. When looking up the definition of ‘urban’ it always refers to cities and towns, not to villages. This could be unintentional; however, if it is not, it is very concerning.
- D.1.3. This is inconsistent with the wider agreed principles such as live-ability, environmental considerations, and other factors. These principles are not mentioned or referred to at all in the introduction. I have grave concerns that the council will not honor or deliver on the other outcomes sought through the masterplan.
- D.1.4. Most of the feedback during the previous consultation does not support the huge growth as proposed.
- D.1.5. This is all **evidence of clear bias**. It is evident that the council’s focus is only on growth. **Council wants Māpua to be an exclusive sea-side town, not a village.**
- D.1.6. The introduction of the draft plan states, "*Māpua is identified, along with Brightwater, Wakefield, Motueka, and Richmond as one of Tasman’s urban centers and is expected to provide for some growth in the district.*" This decision was made many years ago without consultation and at a time when none of the councilors were from Māpua and no consultation was undertaken on this issue, **so clearly undemocratic**. This decision also lacks rationale: the amount of new greenfield developments in Māpua will cause more traffic, will call for roading upgrades, will need many people to travel to Motueka, Richmond and Nelson for work, education and services, cause environmental effects

including green house gas emissions, and cause **higher council rates. Is that what you want to achieve?**

D.1.7. Thus far our Council has been unwilling to discuss the logic and re-consider the ‘urban center’ decision. Dodging this (re)discussion makes me wonder whether TDC has any rationale for this unfortunate decision.

D.1.8. It also conflicts with the objective of preserving the village's character. It seems that the Tasman District Council (TDC) aims for Māpua to become a suburb of Richmond and a wealthy seaside town. Several other townships in the region have been removed from this list, so it is unclear why Māpua has not been considered for removal as well.

Rec.3. I request that the text in the introduction is changed and truly reflect all principles in a balanced manner, to avoid the word ‘urban’ and that retaining the village character is paramount.

Rec.4. I recommend that Māpua is no longer regarded as an urban growth area and to confirm this in the next FDS.

D.2. Section 2.0 Purpose

D.2.1. I very much agree with the statement “*If planning is not done well now, the consequences include environmental and societal impacts from not adapting to the effects of climate change, increasing cost of infrastructure and rates, a lack of housing choices and adverse effects on community wellbeing.*”

D.2.2. The many comments in my submission such as about the incompleteness of the catchment management plan, the lack of an assessment of effects related to more greenfield development demonstrate that the **planning is not (yet) done well.**

*Rec.5. The outstanding issues mentioned in my submission, as well as potentially other submissions, **should prompt the council to pause the project.** This will allow for necessary changes and the preparation of **a second draft for feedback.** Referring to the purpose statement under section 22, this is a crucial opportunity to ensure accuracy.*

D.3. Section 2.2 Masterplan Area

D.3.1. I note that the extent of the area has been discussed in the past and agreed to. Recent consent applications just outside the area might however, if approved, will have a significant impact on the Masterplan in terms of the effects on infrastructure and the capacity provided which then no longer needs to be provided within the masterplan area.

D.4. Section 2.3 Change

D.4.1. I object to the terminology ‘vibrant urban centre’ as explained in item D.1.1. ‘Village Center’ should be used. I will not keep repeating this concern but it obviously applies to the whole document.

Rec.6. The use of the word ‘urban’ is to be avoided throughout the document.

D.5. Section 3.0 Methodology and Approach

- D.5.1. Council members might have been inadvertently misled or not sufficiently briefed in key aspects based on the following observations.
- D.5.2. On step 5, please refer to my comments under general – Feedback process at the start of my submission. In summary the council was pre-determined and did not consider feedback provided with an open mind.
- D.5.3. **Therefore appendix 6 “summary of engagement’ is incomplete and inaccurate.** Consequently, our elected members have not been able to have an informed discussion.
- D.5.4. The fact that the council workshop was confidential confirms the suspicion that the process is not transparent.
- D.5.5. Considering the location of the proposed greenfield developments, the councils determination to proceed despite the feedback received, and the reluctance to revisit the 'need for growth' as discussed later, it appears that the council is more influenced by private interests (willing landowners) rather than the common interest (the Māpua community), often dismissing this as NIMBYism.
- D.5.6. To date, processing the feedback received has not been done with an open mind and not been done with the common good as a priority.
- D.5.7. The draft MPP is incomplete and requires further changes. Therefore, **the process should be paused** for another draft to be reviewed before the Strategy and Policy Committee can make an informed decision.

Rec.7. *The development of the Masterplan must be paused to allow for the creation of a new draft, which will respond to the feedback received. This revised draft should be developed with an open mind and subsequently released for additional feedback.*

D.6. Section 4.0 Principles

- D.6.1. I agree with the principles. As commented before I don’t believe that council has used a balance approach to meet all these principles because growth has been the one dominant factor.
- D.6.2. I am missing an assessment showing to what extent the principles have been met.

Rec.8. *A detailed assessment showing if and how the principles have been met is to be included in the MMP*

D.7. Section 6.0 Place-based scenarios - options

- D.7.1. I object to the simplified support/reject process at an options level. There might well be elements from various options that are preferred.
- D.7.2. And as stated before, much of the feedback provided by me is omitted from the feedback summary report and clearly not considered.
- D.7.3. The text in the analysis column is therefore indicative at best and misleading at worst.

Rec.9. *The reject/accept approach should be replaced by a clear rationale on what the proposal is and where appropriate using an area-by-area approach similar to what was used in the option (see also #D.11)*

D.8. Section 6.0 Specific topics – Outline Development Plans.

- D.8.1. There is very little description or definition of what some of the future land uses will be, what requirements will be used and methods on the planning and design process. This is important because these are **intended to provide guidance to future plan changes**.
- D.8.2. I note that the text under 'residential design' often uses wording such as 'allowing for' and 'could include'. The text should be more decisive and provide direction.
- D.8.3. On 'Future Standard Density', "Future Medium Density", "Future Mixed Density". What densities will be required, which house-types will be required. How will these requirements generally look like? See also comment on section 7.4 Residential design.
- D.8.4. Rather than having strips specifying a different density, I prefer a more integrated approach where various housing types are scattered throughout an area, creating more variety and providing more opportunities for diversity and intergenerational outcomes. In my experience elsewhere a requirement to for example require 30% 1-2-bedroom, 10% social housing, 40% multiunit (smaller than 250m2) and 20% stand-alone housing. This is just an example, but I have seen such requirements work very well.
- D.8.5. I refer to the submission of Nelson Tasman 2050 that will provide some specific detail on what these densities, other related requirements and design process could include. Please consider these carefully and with an open mind.
- D.8.6. On Future Open Space, Future Recreational and Future Reserve, we need to know what the council has in mind and how that will differ from current zone types in the TRMP
- D.8.7. Water sensitive design principles must be applied from the start of the planning process (and not as an afterthought). See #D.19.4 and K.9.1.

Rec. 10. The MMP needs to be specific including the housing types and sizes required in a subdivision to guide the development of outline development plans and the design guideline. These might well differ for each zone, depending on its location.

D.9. Section 6.0 Specific topics - Design Guide

- D.9.1. I support the use of a "Māpua Design Guide". It is important that expert input and peer review and consultation is undertaken during the development of the Design guide. This intention should be clearly articulated in the MMP.
- D.9.2. I support the development of the "Māpua Design Guideline", ensuring that future developments maintain and enhance the Māpua village character. It is important that meeting these **design guide requirements is mandatory and can be enforced**. This is often not the case when using guidelines. For example, the uptake of water sensitive design en supporting practice notes, despite it being required in the Land Development Manual is very low, largely due to the absence of enforceable requirements in the Tasman Resource Management Plan (TRMP).
- D.9.3. It is important that the Design Guide is developed before or simultaneously with the zone changes so that there is a clear link and clarity for developers as to what is required.

- D.9.4. The MMP needs to explain how the Design Guide will be used as a mandatory part of the process.
- D.9.5. To me the village character is determined by buildings and by how an area, including public spaces, look and feel. Buildings closer to the wharf should be in keeping with the older parts of the wharf and apple sheds. (design, shape, colors, materials). Buildings in the rest of the village, including the center should be at a scale that is representative of a village, not a modern town / modern development as was shown in many of the visuals that were presented during the options stage. In addition, a leafy streetscape design would add to a better village character. The current look of Aranui street is very car-dominated with too much tar seal and should be changed. I don't mind two story, in some cases three story buildings as long as the village feel is not compromised. Part of the village is to create pleasant public spaces where our community can hang out.
- D.9.6. It is important that the MMP is specific about what the Design Guide will require and how.

Rec. 11. I support the development of The Māpua Design Guideline. It should area- specific where applicable and developed by experts, peer reviewed and consulted on with the community.

D.10. Section 6.0 Specific topics - Retirement villages and other special housing types.

- D.10.1. The MMP proposes traditional (gated) retirement villages in some of the new development areas. I disagree that this is the best/preferred solution to address the housing shortage specifically for the elderly and it will not address the housing demand for small 1–2-bedroom houses for other parts of the community.
- D.10.2. Retirement villages are a 20th century solution largely promoted by the retirement village industry and a rethink is needed. Retirement villages are expensive and do not foster intergenerational interaction. Alternatively, the requirement of various housing types, including those specifically designed for the elderly, may better support a multigenerational community.
- D.10.3. Additionally, development typologies such as social housing and co-housing should be included as a permitted activity meeting specific requirements (eg density). I was disturbed when staff commented when asked that social housing was not wanted / desired for Māpua. This confirms my suspicion that TDC wants to create an exclusive sea-side town. The Takaka co-housing development, consented by TDC and well underway, is a very successful project. Although I suggest that in Māpua a higher density would need to be required.

Rec. 12. Housing for elderly should be required not through the allowance of traditional retirement villages but through a zone requirement to provide a minimum of 50% of the dwellings in a subdivision to be 1-2-bedroom houses/units

Rec. 13. Other housing solutions such as cooperative housing and social housing should be allowed, in fact encouraged, in part by making these a permitted activity.

D.11. Section 6.0 missing: additional comments by area

- D.11.1. The options document detailed a number of areas and provided various options. However, aside from the 'decision table' in section 6.0, there is a lack of detailed descriptions for these (and other) areas, with only a few maps.
- D.11.2. **This omission is significant** because it informs our community what the specific intent of the TDC and because this information forms a crucial component of the masterplan, which aims to guide future plan changes, as reiterated throughout the MMP.

Rec.14. I recommend that a specific area-by-area description with a full and detailed scope is included in the MMP. My comments by area based on the maps provided and information found across the document follows below. Please consider in conjunction with other comments made in my submission

D.11.3. Village Centre

- To be added to the MMP
- To include a vision for Aranui Rod
- To include Māpua Domain/ Māpua Reserve and Māpua Hall
- Allow mixed use on South West Side of Aranui road between 65 and 85 Aranui (up to 3 stories)
- Allow mixed use for village centre areas between 60 and 70 Aranui

D.11.4. Low lying Māpua

- To be added to the MMP.
- Intended to be areas along Aranui, Toru, Iwa, Moreland, etc
- Allow redevelopment and small intensification infill under certain climate resilient conditions.
- Promise this area will be maintained and looked after until no longer possible as decided under future climate adoption policies

D.11.5. Wharf – Grossi Point

- Need to retain wharf character
- Allow mixed use along 17-25 Aranui and 14-22 Aranui
- No additional hard surface parking
- Both Kite Park and the Māpua Waterfront Park should be zoned as open space separately, putting both areas under the Reserves Management Plan.
- The original purpose for the Waterfront Park being explicitly for general public use and enjoyment, which was hard won by the community should be confirmed because it is essential that full public access of this estuary-side location continues
- The provision of community facilities in Waterfront Park (as promised before) such as playground, more seating, etc is to be included in the actions
- Old wharf buildings to be classified as cultural heritage (not allowed to be modified, losing its character).
- Discuss need for parking assessment.
- Support Cultural Management Plan at Grossi Point

- Include outcomes of boat ramp application process

D.11.6. Higgs Road – deferred residential area

- I object to separate the proposed densities with the “future Medium Density” to be restricted to along few roads. A better integration between housing types and sizes should be required to maximise diversity and intergeneration living. See comments elsewhere and the submission by Nelson Tasman 2050.
- I reject to allow for (gated) retirement villages and propose to allow co-housing developments and social housing (see #D.10).

D.11.7. Ruby Bay

- MMP silent about this area and should be included
- Retain current development pattern. No intensification on sea-side of Stafford Drive
- Allow intensification on land-side of Stafford drive (?) – this was never discussed.
- Need vision on areas like Pomona Rd, Crusader Drive, Korepo Rd, Brabant Drive. – this was never discussed. Will any further development be allowed as recently happened (Admiral drive, etc).
- If no zone changes or other changes are intended the current zoning needs to be visualised and future changes and implications compared to current state discussed.
- Any other discussions and actions visualised and discussed.

D.11.8. Seaton Valley

- I disagree with the need to allow more greenfield subdivisions because the need is not substantiated.
- If there is a future (post 10-year) need then this need needs to be re-justified and priority should be given to allow Māpua Residents to relocate from areas at risk of sea-level rise, assuming that a climate change adaption plan for Māpua will be available within the next 10 years.

D.12. Section 7.1 Responses to hazards and climate change

- D.12.1. I support the principle of climate resilient development and keeping new developments out of harm's way and I acknowledge that large parts of Māpua are vulnerable to rising sea levels.
- D.12.2. The MMP however does not give effect to the need to “adapting to the effects of climate change and reducing the risks from natural hazards”
- D.12.3. The extent and timing of sea level rise is still unknown and until sea level becomes an insurmountable risk, we have a community in the lower parts of Māpua that needs looking after. It might still be 50-100 years away and could be well beyond the life of many existing buildings in these areas. Also, some parts of this area are shown to be still above the 2-meter sea level rise scenario, what is the future for these?
- D.12.4. In these areas is also infrastructure, commercial development (incl the wharf) and open space.

- D.12.5. The MMP does not clarify the strategic direction for these village areas. It is unclear if the current status will be maintained. This comes across as indifferent to the community living there.
- D.12.6. It is also strange that the Māpua Masterplan leaves 'half' of Māpua out of the plan.
- D.12.7. It is important that the masterplan includes these areas and outlines how these will be managed in response to climate change. Simply excluding these areas is not fair to the people living in these areas.
- D.12.8. Unless a retreat option is agreed upon and actioned, the TDC should address how these communities will be supported, how these areas will be looked after and outline this in the masterplan. For instance, property owners may wish to redevelop their sites, and the planning process needs to establish parameters for such developments (e.g., floor levels, climate-resilient designs, etc.).

Rec.15. I recommend that the lower parts of Māpua that are considered as at risk of future sea level rise are included in the MMP with a strategic direction on how these areas will be managed and looked after. This will also provide guidance to future climate adaption plans. This needs to be discussed with the communities involved. (note: this supports the recommended pause on the MMP development)

D.13. Section 7.2 Cultural values

- D.13.1. I support the observations and action in this section

D.14. Section 7.3 Ecological Values

- D.14.1. I strongly support the observations and proposed actions in this section, including the re-instatement of the former natural wetland.
- D.14.2. Stormwater runoff from future (and existing) developments should not be treated in this wetland as is suggested in the catchment plan. This runoff should be treated separately, and the point of discharge should be carefully chosen to avoid any negative effects on the receiving environment. See more comments #D.19.7, #D.19.8

D.15. Section 7.4 Housing and Business

- D.15.1. In the past, traditional subdivisions have been developed with relatively large lots and 3 or more bedrooms. This has attracted many people from outside the region. According to statistics New Zealand about 50% of New Zealand households have only 1 or 2 people. The local survey held that was used to support the development of the FDS stated that 19% of the surveyed residents were looking for smaller houses. This survey also stated that young people, young families and other minorities were underrepresented in this survey. So, this 19% is in fact higher, so let's say about 25% for the purpose of the calculation below. With Māpua having about 3000 residents, 25% of that is 750 people who would be looking for 1-2 bedroom houses. Catering for these needs would also free up existing housing for those looking for the 3-plus bedroom options. So we would still be able to cater for this, mainly out-of-region demand.
- D.15.2. There is no recognition of this large backlog of the need for more and in particular smaller housing choices. Not just for elderly people but also for young families. **Just**

providing a yet undefined mix of housing styles going forward will not address the current deficit any time soon.

- D.15.3. What is also **very concerning is seeing that parts of our community must leave Māpua when they need scale down with no options for them in Māpua**. They are losing their friends and family, often in times when a social network is most important. **The current proposal does not discuss nor address this problem.**
- D.15.4. It is not good enough for council to say ‘we need to cater for the influx from outside the region; nothing we can do about it’, while the needs of the local community are ignored.
- D.15.5. The traditional approach to **leave this to the market has never and will never work**. In fact, the market has created this problem. Future plan changes need to have strong requirements to provide for the immediate and local needs (first) and the MMP needs to provide guidance for that.
- D.15.6. I am aware that there are a number of applications for new subdivisions just outside the plan area. If some or all of these are granted, then the additional dwelling capacity provided should be removed from the need for greenfield areas as suggested in the MMP.
- D.15.7. I’m concerned with the paragraph quoting a section in “The Housing and Business Capacity Assessment” stating “in the short term there is insufficient housing land capacity in Motueka, Brightwater and Māpua. The shortfall in Māpua and Brightwater is due to insufficient infrastructure. In the long term there is insufficient housing land capacity in Motueka, but the shortfall is expected to be provided for in Richmond and Māpua’.
- D.15.8. This paragraph states that the lack of capacity in Māpua in the short term is caused by insufficient infrastructure, so not by the lack of land zoned for future development.
- D.15.9. It is great to read that there is an agreement to require more housing styles in already zoned land. This will provide additional capacity, which is then not needed elsewhere.
- D.15.10. In other words, **there is no business case to zone additional residential land** to cater for the short-term needs and there is no compelling and quantified logic provided to justify the additional greenfield areas in the long term.
- D.15.11. If additional capacity is provided when the land that appears to be approved under the Fast Track Bill proceeds, then **the statement above (D.15.10) is even stronger**.
- D.15.12. For the reason explained in items D.1.6 and D.1.8, **I strongly object** against sentence “*This means that Māpua is a key area for providing for growth in the district.*”

Rec. 16. There is adequate capacity in the already zone areas when allowing for more and smaller housing types so additional greenfield capacity is (1) not substantiated, (2) not needed in the next 10 years and (3) should be removed from the MMP

D.16. Section 7.4 residential design

- D.16.1. As already discussed in ###, it is important that there is a clear understanding about what densities are sought and can be achieved so that there is a clear understanding on what the MMP is proposing and also to provide clear guidance to the Outline Development Plans and related zone changes.

- D.16.2. For medium density development, the MMP proposes a “*dwelling density between 20-30 dwellings per hectare on sites averaging between 200-300 square meters*”.
- D.16.3. A quick search revealed that good practice in New Zealand defines medium density as 30-60 dwellings per hectare, and in larger cities, up to 75+ dwellings per hectare. This indicates that (1) TDC does not currently follow industry standards, and (2) if these standards were adopted, more dwellings could be accommodated in already zoned areas. This is particularly relevant for addressing the need for smaller 1-2 bedroom houses.

D.17. Section 7.5 Open Space and Community Facilities

- D.17.1. The need to provide for additional sports fields and associated amenities at the bottom of Seaton valley is to be re-assessed based on requested changes to greenfield development in Seaton valley
- D.17.2. Assuming the outcomes of the hearing about the Boat Ramp will be available in time for the completion of the MMP, the outcomes and implications should be included in the MMP. If not, the MMP should provide two visions for affected areas: one with and one without the boat ramp.
- D.17.3. Open space should not just include reserves but also **include other public space such as streets**. Our community spends like any other community a lot of time in those public spaces and a vision on how all public spaces should be experienced should be included.
- D.17.4. The area encompassing the Mapua domain and the Māpua Community Hall is excluded from the plan. I’m aware of requests to add/change services in and around the domain. A vision should be discussed with its users and included or developed for this area.
- D.17.5. Aranui Road is the gateway into our village. The layout and appearance are not very appealing and do injustice to our wish to have a real village character. The streets for people project was designed to fail despite its great intentions. Greening the streetscape would significantly contribute to achieving an enhanced village character. A clear vision for Aranui Rd, covering aspects such as appearance, character, movement, and public spaces, is missing and should be included into the plan providing future direction for various actions in and around Aranui Road.

Rec. 17. Widen the scope of this section to ‘Public Space (reserves and streetscape)’

Rec. 18. To include a vision for the Māpua Domain including te Māpua Community Hall in consultation with its users.

Rec. 19. I recommend that a vision for Aranui Rd as a gateway into Māpua village be included

- D.17.6. I support “Cultural Information Boards at Grossi Point and Waterfront Park depicting both Maori and European history of the areas” but not to limit this just to these sites but also provide signs and use other means (e.g. website) to show and explain about other areas of cultural significance as mentioned in section 7.2
- D.17.7. The issue of the location of the fire station is discussed under open space. A more logical space would be under infrastructure. Although the observations made in this

section might be correct I do not agree with the 'no action' result. For reasons explained many times the current location is not future proof and will compromise the services of the FENZ.

Rec.20. An ongoing action needs to be included in the MMP to commit council to continue to take to, pressure FENZ to move the location of the fire station to a better accessible spot (text and action table).

D.18. Section 7.6 – Movement

- D.18.1. The section of movement should be broadened to include the streetscape. Roads, cycling and walkways are important components of the public space. Our community should enjoy using these and be able to safely hang out with others. Attention to children, youth and elderly is paramount.
- D.18.2. Greening should be a key feature of the streetscape for environmental and health reasons.
- D.18.3. Water Sensitive design (wsd) should also be considered where appropriate in future streetscape, and mandatory in areas of high risk (see stormwater) in keeping with the Urban Stormwater Strategy.
- D.18.4. The 'Streets for People' trial has been completed. It is good to see that the MMP acknowledges that this project used 'temporary installation'. It is now up to TDC to develop a long term vision on Aranui Rd and identify actions to over time change the temporary features into permanent features. I therefore disagree with the statement "As a result of this separate programme of works, no walking or cycling connections along Aranui Road are included in the Masterplan."

Rec.21. The section movement should be renamed and broadened to include streetscape recognizing streets are also public spaces and subsequently include a discussion and identify actions.

Rec.22. A vision for Aranui Road is to be included as well as resulting actions.

D.19. Section 7.7 Stormwater Catchment Management - overall

- D.19.1. It was the intention to integrate the Stormwater Catchment Management Plan (CMP) into the Masterplan (see page 5 in the MMP). It is now presented as a separate attachment in the 'supporting information' and is a very incomplete draft CMP.
- D.19.2. My key concerns are:
- D.19.3. The CMP is incomplete and not supported by accessible interactive maps as is the case in the [Richmond](#) and [Motueka](#) CMP's. Flood maps are not provided in the CMP and included as a future action. This makes it in some cases impossible to consider the information at the scale and detail required.
- D.19.4. Water sensitive design (wsd) is not just stormwater treatment but is a design philosophy that includes many other elements such as avoiding stream loss, minimizing earthworks, minimizing changes to landform and minimizing impervious surfaces all intended to minimizing changes in hydraulic responses caused by rainfall events (runoff, groundwater flows, etc). **This process should start at the early phases of planning and not be considered as an afterthought.** There is no indication of this

understanding in the MMP and should be added. (happy to help drafting a wsd structure planning guideline)

- D.19.5. Maps of flood plains and sea-inundation are not provided in the CMP and included as a future action. It is generally known that the flood plain assessments have been underway for years and it is very disappointing that this information is not included in the CMP. Without this information it is not possible to take any flooding risks into consideration.
- D.19.6. It is impossible to assess downstream impacts caused by developments such as stream deterioration and flooding. **Many flooding incidents** across Aotearoa, including Tasman District Council **have been totally preventable**. This is the time to undertake these assessments to avoid the preventable. It is simply bad practice to address potential stormwater issues as an afterthought after many planning decisions are made.
- D.19.7. The proposed Seaton Valley wetland is described both as a stormwater treatment device and a restored natural wetland. These two functions cannot be combined. Manmade wetlands designed for stormwater treatment are off-line systems specifically designed for this purpose. In contrast, natural wetlands are typically on-line components of natural ecosystems. So Council does not follow its own guideline “Wetland Practice Note for Nelson and Tasman Councils”. The community's expectation to reinstate the old natural wetland in the proposed manner will not be feasible if combined with stormwater treatment.
- D.19.8. Stormwater treatment should be provided by the developer as part of the development process, typically located in the development areas and not be integrated with ‘natural reserves/wetlands’. The wetland at the bottom of Seaton Valley should be reinstated as a natural wetland, reflecting its historical state from many years ago.
- D.19.9. I left more detailed comments on the draft CMP in section K of this submission.

Rec.23. I propose to halt the development of the Māpua Masterplan until after the catchment management plan is completed.

Rec.24. The catchment plan should include the assessment of any potential risks caused by potential developments on flooding (floodplains and overland flow) and the receiving environment and provide clear direction on actions to prevent any future stormwater issues.

Rec.25. The catchment plan should direct the MMP to state that no development can take place in floodplains and that overland flow paths are identified and protected as part of future zoning rules.

Rec.26. A water sensitive design process should be required starting at the start of the planning process.

D.20. Section 7.7 Specific comments on the proposed text

- D.20.1. The aims listed in this section don't include the need to assess implications and opportunities related to future developments

Rec.27. I propose adding to the key aims outlined in section 7.7: "Understand the natural state, values, and constraints of the current stream environment prior to development, as well as the potential implications of possible development. This includes identifying measures to (1) prevent or (2) mitigate and/or enhance any negative implications where aspirations are not met."

D.20.2. The wording 'Investigate strengthened stormwater rules' in the identified actions is weak and offers a way out.

Rec.28. I propose to change the text to "Implement changes to stormwater rules"

D.20.3. I agree with the second action to allocate budget for the wetland at 49 Stafford drive but this area should only be used to re-instate the wetland. Any stormwater treatment should be provided by and paid for by the developer on his own land!

Rec.29. The purpose of the purchase of land for a natural wetland is to be clarified as discussed above.

D.20.4. I strongly agree with the need to protect the Aranui Wetland. Without any further information it is hard to assess whether the proposed action is the best response.

D.20.5. I note that many actions on page 25 start with 'investigate'. This confirms that the catchment plan is not complete and investigations should have been carried out and responses identified and included in the catchment plan.

D.20.6. I agree with the action "Look for opportunities to cost-effectively retrofit water quality treatment" and agree with giving a lower priority for 'relatively low risk contamination areas'. Contamination risk assessment have not been carried out and should have been similar to the Richmond and Motueka catchment management plans. Based on my experience, **I assume that high use roads such as Aranui Rd and larger car parks such as the car parking servicing the wharf will be high risks.** Consequently an action to treat these areas should be included.

Rec.30. To resolve actions that start with investigate and update the catchment management plan and MMP accordingly

Rec.31. Include an action to treat the carparks servicing the Māpua Wharf commercial area and Aranui Road

D.20.7. The action "Carry out a monitoring programme in Māpua, in collaboration with iwi, to identify potential stormwater quality issues and track progress towards achieving our stormwater aspirations." should include the need to identify and implement improvement actions where aspirations are not met.

Rec.32. Include the need to identify and implement improvement actions where aspirations are not met to the last action proposed

D.20.8. It is not clear what the status of the flood maps presented at the end of this section is because the CMP states that there are no flood maps and includes an action that flood risk assessments are yet to be carried out. It is also not clear if the sea level rise shown

on the maps include soil subsidence and use the most recent available sea level rise predictions.

Rec.33. Flood plain information is to be clarified and updated if necessary

D.21. Section 7.8 Infrastructure

- D.21.1. It is strange to read that a cycling /walking bridge is dismissed on the grounds of the significant effects on the 'outstanding features of the Māpua Waterfront area' and the 'stunning views over the inlet' while the Māpua Boat Ramp has been actively supported by Council including the gifting of substantial funds to support the process.
- D.21.2. There is no alternative safe way to commute between Richmond and Māpua. The ferry timetable doesn't allow for daily commuting for work, education or services because of its limited operation times.
- D.21.3. I disagree that a bridge is simply dismissed while no safe alternative walking/cycling options are investigated or offered. This shows the unwillingness of the council to consider the need to provide for a safe walking/cycling link.

Rec.34. I recommend that a safe (off road) walking cycling link is investigated and implemented between Māpua and Richmond and to keep the option for a bridge open until the investigation is completed.

- D.21.4. Despite recent upgrades in the wastewater network, the network still overflows during times of heavy rain. This is illegal according to the TRMP. So, these upgrades are not adequate to manage current wet weather flows. Allowing new connections from future developments will make this worse. In addition, there is no proof that the proposed actions in the MMP will make the network comply with the TRMP stating that overflows are NOT permitted. See communication between me and council on this subject over the last few years.

Rec.35. New developments cannot proceed until council can demonstrate that there will be no wastewater overflows in Māpua.

- D.21.5. This section **doesn't talk about other infrastructure** such as health, social services, education, water supply, stormwater, and transport.
- D.21.6. On transport it seems inevitable that an upgrade of road infrastructure will be required to service all the additional traffic to and from the new developments. Not just local roads but also the connections with SH60 and any downstream cumulative effect on the roading network specifically towards Richmond. There is no information in the MMP analyzing risks, actions and future costs related to these issues (e.g. increase in accidents on the intersection of Māpua Drive and SH60).

Rec.36. The implications of the growth proposed in the MMP on the transport infrastructure are to be included including the risks and resulting actions.

Rec.37. The implications of the growth proposed in the MMP on the other infrastructures such as health, social services, education, access to council services are to be included in the MMP.

D.22. Section 8.0 Implementation and actions

D.22.1. I endorse that TDC will undertake yearly progress reporting on the actions but the suggestion is that only completed actions will be listed

Rec.38. I recommend that the yearly 'Masterplan Action Plan Progress Report' will show all actions and their status including for those not completed when these will be actioned.

D.23. Section 9.0

D.23.1. It is interesting to note that consultation feedback is not included in the references

E. Appendix 1 Action Plan

Rec.39. I recommend that the action plan is updated based on my feedback and the results of this round of consultation in general.

Rec.40. Please consider all feedback on the action plan as specific recommendations.

E.1. Action 1.

- E.1.1. First priority should be given to the plan changes for existing urban and what is currently zoned as 'Deferred Residential' as well as the Māpua Design Guideline.
- E.1.2. Based on my submission, zone changes for the new greenfield areas should be removed or given a long-term priority. There is no business case (see all comments in section) to undertake these now.
- E.1.3. Policies and Rules for areas that are not 'climate resilient' should be added to the MMP, existing rules should be reviewed so these areas keep liveable as long as possible (see D.12)
- E.1.4. The need for consultation and peer review should be added

E.2. Action 2

- E.2.1. The wording should be changed so that **it is required** to implement water sensitive design (see D.20.2)

E.3. Action 4

- E.3.1. I agree with the general intent of the action but, other than a few wastewater projects, there is no supporting text in the document about which projects the council has in mind (see comments in D.21).

E.4. Action 8

- E.4.1. I do not agree with this action also because the need for paid parking is not discussed/justified in the MMP (comes totally out of the blue). I also disagree with the need to provide more paved (angle) parking along Tahiti Street. If any improvements are needed this should be provided using permeable paving.

E.5. Action 10

- E.5.1. This action depends on the need and timing of more development in Seaton Valley. The Māpua domain appears to be under used and I am not aware of any needs assessment.

E.6. Action 11

- E.6.1. I agree with the action to reinstate the Seaton Vally Wetland and Stream restoration, regardless of whether more development will eventuate in Seaton valley. I disagree to also use this wetland for stormwater treatment. See also #D.14.1, #D.14.2, #D.19.7, #D.19.8.

E.7. Action 12

- E.7.1. Changes to speed limits as per the Nelson Tasman Speed Management Plan following community consultation should be implemented regardless. I can't see if/how central government can enforce higher speed limits even if they are deemed non-complying. This is an opportunity to challenge central government if it comes to that and provide what the community asks you to do.

E.8. Action 13

- E.8.1. I agree to zone most of kite-park as open space but propose to zone the strip along Aranui Rd as mixed use (climate resilient). The future use of the open space should exclude it being used as a car park. I also can't see the need to make this a short term action.

E.9. Action 15.

- E.9.1. I agree with undertaking a parking survey and this should be followed by a parking needs assessment before any other action related to parking in the Wharf area are confirmed.

E.10. Action 16

- E.10.1. This should be part of the vision and following action on Aranui Rd as discussed in #D.9.5, #D.18.4.

E.11. Action 19, 20 and 21

- E.11.1. I support these actions but feel most of this should be and can be a short term action

E.12. Action 22

- E.12.1. There are many actions in the CMP. This action should be more specific although it would be great if all of the actions could be implemented in the short term

E.13. Actions 23 and 24

- E.13.1. Since improvements to the wastewater network are long-term actions and the network still experiences overflows, additional connections cannot be allowed as they would cause more wastewater overflows which are a prohibited activity. See also #D.21.4 and Rec.35.

E.14. Action 25

- E.14.1. I assume this action talks about the seawall in Ruby Bay. It is disappointing that many years after this area was flooded and investigations were called for, no improvement actions have been identified and planned or completed, only more investigations are proposed. The catchment management plan should have identified solutions that have been tested using hydraulic calculations. Kicking the can down the road.

E.15. Action 26

- E.15.1. I agree with this short-term action. Just investigating is not enough. There needs to be a commitment to implement stormwater treatment of high-risk areas in keeping with the Urban Stormwater Strategy. See also my comments on the catchment management plan (section K).

E.16. Action 32 and 33 and 35

- E.16.1. These actions are related the Māpua Domain. There is no text in the main document identifying the need for these actions. I propose that a discussion about this area is included in the MMP, including the justification for these actions. Action 35 and actions 32 and 33 seem to overlap as well.

E.17. Action 37

- E.17.1. I agree with the intent, but the wording should be stronger. I don't believe this needs investigating, just needs to be done. I suggest the wording: "Require the protection of existing native vegetation, the planting of specimen trees and increasing green cover in all future plan changes"

F. Appendix 2 Spatial Maps

- F.1.1. The maps need to be updated based on submissions received.
- F.1.2. It is misleading to see that a green color is used to indicate 'Future standard housing'. A color typically used for green spaces.

G. Appendix 3 Options and Actions

- G.1.1. It is not explained what the intension is of this appendix but in reading it appears that it only describes what was proposed at the options stage almost a year ago.
- G.1.2. As I discussed at the start of this document, I submitted last year on these options but hardly any of my comments have been included in the summary document and appear not to have been considered in the current draft (see #B.1.2)

H. Appendix 4 Cultural Values

- H.1.1. I do not feel qualified to make comments on the details of this section, but I support that cultural values are recognized and celebrated with priority.

I. Appendix 5 Population, Housing and Business statistics

- I.1.1. I want to reiterate my comments on the need to grow and for who previous in this document. See #B.2,#D.1 #D.15. Some additional comments follow below
- I.1.2. Māpua is not an urban environment (bottom of page 52), Māpua is a village. Retaining the village character is one of the most important feedback received.
- I.1.3. The paragraph on the top left of page 53 states: “**Māpua has (only) a small shortfall in the short term (years 1-3) but sufficient capacity by year 10.** In the long term Māpua needs to provide for the shortfall in other urban areas particularly Motueka which has a shortfall of 800 homes by year 30. The following table (Table 12 from the Nelson Tasman Housing and Business Assessment 2024) provides further details.”
- I.1.4. I don not see/agree why the village Māpua has to make up for the shortfall in Motueka. Where was this decided? Was there any consultation on this?
- I.1.5. As I discussed in section #D.15, the increased density proposed in existing residential and the deferred residential zones will cater for some or possibly all of the shortfall. No calculations are provided to support the re-justification for the new development areas in Seaton Valley as identified in the FDS.
- I.1.6. The absence for the need for these new development areas is confirmed by the next paragraph stating that there is no need for these areas in the next 10 years.
- I.1.7. I disagree with the statement “*residential demand in the Māpua/ Ruby Bay will be 404 dwellings*”. The allocation of future needs across the region is totally arbitrary.
- I.1.8. Based on my discussion related to the backlog of the need for 1-2 bedroom houses in Māpua (see #D.15.2), any additional capacity should mainly in providing 1-2 bedroom dwellings, be provided close to the village center by quality intensification and higher densities in the areas currently zoned as deferred residential. TDC has not provided any calculations on the extra capacity achieved in these areas but compared to the traditional standard subdivision, this has to be significant.
- I.1.9. Any additional capacity for traditional large lot/large houses and additional capacity provided in new greenfield developments should be deferred by at least 10 years and re-justified in 10 years from now when an updated version of the Masterplan is prepared.
- I.1.10. We are now one of the most expensive areas in which to build in New Zealand. With all the uncertainty related to future demand for housing, Given the uncertainty and economic challenges it is more than likely that the future need for more houses, certainly in the next 10-20 years will be less than what has been anticipated. It is sensible to phase any provision for future development. This would allow Council to adapt to any changes in forecasts. Yet, TDC is determined to provide the full capacity from day one plus more. I have raised this point before, but TDC appears to be unwilling to have a discussion.
- I.1.11. I recommend a total re-write of this section. The new section should include calculations of current and future capacities for each zone/development and the phasing.

J. Appendix 6 Summary of Engagement

- J.1.1. I am upset by this document. I was very disappointed that hardly any of my feedback was included in this document. My feedback was intended to be constructive. As

stated before, I feel that this document attempts to confirm the councils (growth) narrative and doesn't do justice to the people that put in an effort to provide feedback. (see also #B.1 and #D.5).

- J.1.2. The consequence is that the elected members are not aware of much of the feedback provided and therefore are not in the position to make an informed and unbiased decision.

K. Appendix 7: Draft Mapua Stormwater Management Plan – Detailed comments

- K.1.1. It is unclear why the Mapua Stormwater Catchment Management Plan is not made available in the same digital format as the [Richmond](#) and [Motueka](#) Catchment Management Plans. These use a more accessible ‘story map’ format by which it is much easier to navigate through the plan with the ability to look up information and provide the ability to have access to many map layers, information held in these maps and the ability to zoom in/out.

Rec.41. The Māpua/Ruby Bay catchment Management Plan should be presented in a similar format as for the Richmond and Motueka Catchment Plan using an interactive, map based digital platform sometimes called StoryMap.

- K.1.2. In the past, TDC has consulted on the Catchment Management Plans of Richmond and Motueka. Having the Mapua Catchment Plan presented as an appendix of the ‘supporting documents’ to the Mapua Masterplan is not the type of consultation needed to support a catchment management planning process. Separate consultation should follow before the catchment plan is accepted.

Rec.42. The Māpua/Ruby Bay Catchment Management Plan should also be consulted on separately similar to what was done for Richmond and Motueka to invite more stormwater specific feedback

Rec.43. The comments below should also be taken as recommendations

K.2. Catchment Overview

- K.2.1. Catchments and intermittent and permanent streams are not shown (figure 0-1). Digital interactive access is needed.
- K.2.2. The catchment description is taken from Wikipedia records. Surely more and better information is locally available.
- K.2.3. Figure 0-2 is very small and not well accessible. Digital interactive access using a sliding map is needed.
- K.2.4. Rainfall patterns are not supported by a map as is the case in the Richmond CMP.

K.3. Rivers and Streams

- K.3.1. Under Rivers and Streams (page 9), only the Seaton Valley stream is mentioned. The supporting maps are very small and not readable including its legend.
- K.3.2. It is required to map all the catchments and all ephemeral and intermittent streams and have a way to zoom in/out using an interactive map!
- K.3.3. Looking at objectives 1.2 in the Urban Stormwater Strategy requiring no stream loss, all streams have to be mapped (in the CMP) and so it is clear when new development proposals don’t cause any stream loss!

K.4. Land Coverage

- K.4.1. The maps (figure 0-4) related to Land Coverage are very small inaccessible and legends are not readable. Need an interactive map. Reference to key information in other documents stating a long URL is not helpful. Key information / maps should be included in the CMP.
- K.4.2. Reference to Plan Change 81 is unclear (top of page 10). Many readers will not know what this is. A short description with relevant information related to Māpua needs to be included.
- K.4.3. Masterplan maps need to be supported by legends and be accessible using interactive maps (pages 10-12)

K.5. Stormwater assets

- K.5.1. Figure 0-8 showing the stormwater network is very small, has no legend and should be accessible using interactive map technology
- K.5.2. The location of the Seawall is discussed but not shown on an (interactive) map.
- K.5.3. I support the mapping, protection and enforcement of overland flow paths. How will this be achieved as it has been on the cards for many years already.
- K.5.4. Figure 0-10 is hard to see because it is too small and not interactive.

K.6. Stream Health

- K.6.1. Have all (permanent and intermittent) streams been assessed?
- K.6.2. The scope of health assessment appears much more limited compared to what was done for the Richmond CMP but hard to see because no detailed information is accessible. Stream modification and riparian margins and barriers to fish passage are not included.
- K.6.3. The observation that all streams in Māpua have been modified highlights a significant issue and underscores the need for improved stream management practices.
- K.6.4. Improvement actions should also include: 'no stream loss is required through zone changes' and 'riparian planting and access to streams to be achieved through.

K.7. Water quality and contamination

- K.7.1. I very much agree with the statement that "Compared to other regions in New Zealand, the adoption of stormwater treatment and water-sensitive designs in new subdivisions is low". This observation and the reasons for that are clearly explained in the report ["Applying Low Impact \(Water Sensitive\) Design in Nelson Tasman"](#) from 2016. After 9 years this still hasn't resulted in improved stormwater requirements in the TRMP.
- K.7.2. An assessment of contamination risks for high-use roads and car parks, like the one done in Richmond, is missing. **The roads in and out of Māpua, Aranui Road, and the carparks near Māpua Wharf likely fall into a medium or high-risk category and need stormwater treatment.**
- K.7.3. The location of wastewater pumping stations and overflows should be mapped with an indication of the (modelled) overflow frequency
- K.7.4. The observation in the aspirations and target table on page 19-20 stating that *"Treatment from Residential development is excluded from the Nelson Tasman Land Development manual (NTLDM)"* is **factually incorrect**. [The stormwater chapter in the](#)

[NTLDM](#) states in section 5.4.8.2 “*Stormwater treatment shall be provided within greenfield, infill and brownfield developments, including any redevelopment of roads and carparks that meet the treatment requirements in 5.4.8.2*”.

- K.7.5. The NTLDM is however not enough to enforce the requirement for Water Sensitive Design (WSD) at the planning stage. The Resource Management Plan requirements are critical to enforce the need to implement ESD to give effect to the Urban Stormwater Strategy and complement the NTLDM requirements. **Plan change text must be strong and leave no room for avoiding the desired outcomes.**
- K.7.6. Also, the MMP needs to require that Water Sensitive Design (WSD) will be required during every zone-change for all (re)developments. The text behind in the “Aspirations and Targets table” needs to be adjusted accordingly and targets and actions identified resulting from that.
- K.7.7. The 10-year target in the Aspirations and Targets table under section 2.3 to retrofit council-owned car parks should also include high-use roads. Stormwater runoff from very high-use car parks in the area of the wharf, including parking along Aranui Rd, Iwa Street, and Tahi St, must be treated. If the boat ramp project proceeds, parking related to the boat ramp and the boat ramp itself should also undergo treatment.
- K.7.8. With this target the council commits to making funds available to undertake these retrofits. I don’t believe these funds are available in the current LTP, so council must include these in the next LTP.
- K.7.9. To meet the 10-year target under aspiration 2.3, improvement action I.3 should be changed to “Install stormwater treatment devices at carparks within 10 years”

K.8. Flooding

- K.8.1. I fail to see why in the MMP some flood maps are presented but in the CMP maps of flood plains and sea-inundation are not provided and only included as a future action. It is generally known that the flood plain assessments have been underway for years and it is very disappointing that this information is not included in the CMP.
- K.8.2. This triggers the question whether TDC believes the current mapping is not reliable and should be repeated.
- K.8.3. This type of information is critical to understand risks to life and property in existing and new developed areas and changes in risks caused by new developments. **A CMP without mapped flood risk assessments is not a CMP.**
- K.8.4. Flood risks assessments should include risks assessments for various return periods (as a minimum 1% and 10% AEP), various development scenarios (with and without proposed development) and include climate change (changes in rainfall and sea level rise). Very similar to what was undertaken for the Richmond and Motueka CMP’s.
- K.8.5. Without this information it is not possible to take any flooding risks into consideration.
- K.8.6. In my professional life I have seen too many examples where flooding would have been avoided when flood risks assessments would have been considered. **Many flooding occurrences in this region have been totally avoidable** and the current approach using flooding as an afterthought is simply not acceptable and **exposes the council and the community to avoidable risks to people and property.**
- K.8.7. I am missing an Aspirations and Targets table as is included for the other aspirations.

K.9. Development

- K.9.1. I generally agree with the observations under key-issues why there has been a low uptake of water sensitive design. The lack of clarity in structure planning is one of these. The MMP provides the opportunity to do better, but **this does need a comprehensive approach at the initial planning stages, not as an afterthought.** These approaches include minimizing earthworks, avoiding large modifications of the landform incl compaction, retaining intermittent and permanent streams, using a 'green-finger' approach in the initial stages of the design, minimization of impervious areas and finally fit for purpose stormwater treatment (happy to help).
- K.9.2. The 10-year target for Aspiration 4.1 and 4.2 should include the need to require wsd in addition to the support and guidance. There should be no room for not having to provide stormwater treatment.
- K.9.3. Action 1.7. The hard surfaces (pedestrian areas and car parks) are most polluted in the wharf area, so planter boxes (typically above ground) would not be able to catch stormwater runoff from those areas. I suggest providing 'raingardens'. A practice note on how to design these can be found in TDC files [here](#).

K.10. Integration

- K.10.1. I suggest changing improvement action 1.10 into "Look for and implement stormwater improvement opportunities in other council projects e.g. improved quality treatment" such as enhanced stream habitat (incl riparian planting) and related to roadworks.

K.11. Summary

- K.11.1. Should be reviewed as result of suggested amendments discussed above