

PRIVATE PLAN CHANGE REQUEST

to the

Tasman Resource Management Plan



Request made by:

NETWORK TASMAN LIMITED

Pursuant to:

**RESOURCE MANAGEMENT ACT 1991
CLAUSE 21, FIRST SCHEDULE**

AMENDED AUGUST 2019

Table of Contents

Plan Change Request

CHAPTER	HEADING	PAGE
1.0	The Purpose and Reasons for the Request	4
2.0	This Private Plan Change Request	6
3.0	Section 32 Analysis	15
4.0	Assessment of Environmental Effects ('AEE')	21
	4.1 Introduction	21
	4.2 The Site and Environment	22
	4.3 Traffic Effects	22
	4.4 Residential Amenity	24
	4.5 Productive Values / Cross Boundary Effects	28
	4.6 Visual Amenity	28
	4.7 Capacity of Services	30
	4.8 Natural Hazards	30
	4.9 Heritage and Cultural Values	31
	4.10 Ecological Values	31
5.0	The Relevant Planning Documents	32
	5.1 The Tasman Regional Policy Statement	32
	5.2 Tasman Resource Management Plan	34
6.0	Consultation	42
7.0	Evaluation of Matters under Clause 25(4) of the First Schedule	42
8.0	Conclusion	43

Attachments

	Title	Source	Date
1	Proposed expanded Schedule 17.5A boundaries	Canopy Landscape Architects	March 2019
2	Site Plan and TRMP Zoning	Canopy Landscape Architects	March 2019
3	Certificate of Title	Landlink Agency Ltd	March 2019
4	Traffic Impact Assessment - <i>Amended</i>	Traffic Concepts	July 2019
5	Landscape Assessment	Liz Gavin, Canopy Landscape Architects	February 2019
6	Stormwater Assessment	Tonkin & Taylor Limited	November 2018
7	Noise Assessment	Acoustic Engineering Services Limited	October 2018
8	Schedule 17.5A	Tasman Resource Management Plan	August 2014
9	Consolidated Changes Requested to the TRMP - <i>Amended</i>	Plan Change Request	August 2019
10 - Additional	Costs, Benefits and Risks Matrix	Landmark Life	August 2019
11 - Additional	Iwi Consultation and Feedback		

Statutory Form

Request made to: The Policy Manager
Tasman District Council
Private Bag 4
RICHMOND 7050
Attn: Mr B. Johnson

Applicant: Network Tasman Limited

Legal Description: Lot 1 DP 20183 (CT13B/293)
Lot 2 DP 435942 (CT ID 534073)
Lot 1 DP 435942 (CT ID 534072)
Lot 3 DP 435942 (CT ID 534074)
Lot 4 DP 435942 (CT ID 537340)
Lot 2 DP 4875 (NL122/55)
Lot 3 DP 4875 (NL121/185)
Lot 1 DP 20392 (NL13A/1079)
Lot 1 DP 19736 (NL13A/1079)

Location: 68 Main Road Hope (valuation Ref: 1943018100)
52 Main Road Hope (Valuation Ref:1943019207)
32 Main Road Hope (Valuation Ref:1943019208)
24 Main Road Hope (Valuation Ref: 1943019207)
18 Main Road Hope (Valuation Ref: 1943019000)
1 Norman Andrews Place (Valuation. Ref: 1943019100)

Nature of Request: To expand Schedule 17.5A of the Tasman Resource Management Plan to incorporate adjoining land owned by Network Tasman Limited.

Address for service: Duncan Cotterill
PO Box 827
Nelson 7040
Attn: Nigel McFadden

Phone: (03) 546-6223
Email: nigel.mcfadden@duncancotterill.com

1.0 The Purpose and Reasons for the Request

1.1 Background and Explanation

1.2 The land within and surrounding Schedule 17.5A has been developed for a range of light industrial, commercial and residential purposes yet the underlying zoning is Rural 1.

1.3 In 2014 Private Plan Change 50 was approved to expand the scope of Schedule 17.5A to include specified surrounding sites, expand the range of activity conditions, include specific building and construction activity criteria and establish particular matters of control. These amendments allowed for the practical administration of the Schedule to ensure the purpose of the Act was achieved.

1.4 This current Plan Change Request proposes to further expand the boundaries of Schedule 17.5A into an adjoining site with the same character and land use opportunities. Some consequential amendments to the activity and building conditions and matters of control are also proposed under this Plan Change Request.

1.5 Careful consideration has been given to actual and potential adverse traffic, landscape, flooding and amenity effects of these changes. The specialist traffic, noise, landscape and stormwater assessments discuss the relevant issues in detail, with the findings of these reports fully integrated into this Request.

1.6 Existing Environment

1.7 Attachment 2 includes two plans which show the extent of sites included within Schedule 17.5A under the TRMP.

1.8 At present there are two separate vehicle accesses (CP57 and CP66) to the sites within the Schedule from Main Road Hope, there is an internal circulation road within the Schedule site which allows traffic to enter / exit via either entrance.

Lot 1 DP 20183 contains:

- Network Tasman offices and associated parking.

Lot 1 DP 435942 contains:

- Farmlands (Retail warehouse supplying a wide range of farming products and equipment).
- Delta Utility Services Ltd (Delta carry out electricity line maintenance, upgrade work and new infrastructure around the district and beyond).

Lot 3 DP 435942 contains:

- Air Temp Industries Ltd (Specialists in repairing and installing vehicle air conditioning in vehicles of all scales from cars through to refrigerated heavy goods vehicles, earth moving and agricultural machinery).

- Ideal Electrical (Ideal is a distribution / retail warehouse providing electrical equipment for a range of uses – residential, commercial and industrial).
- AB Equipment (AB Equipment hire and sell construction and forestry equipment including vehicles. They also hire and sell equipment such as forklifts, order pickers, reach stackers and other similar equipment).

1.9 Proposed Activities

- 1.10 At the current time Network Tasman do not have a clear indication of what usage will be located on 68 Main Road Hope. Furthermore, Network Tasman are uncertain at this stage whether they will occupy the site themselves or lease the land out to a third party.
- 1.11 The existing Schedule 17.5A contains a list of activities which may be undertaken as a Controlled Activity and this can be taken as a guide to the types of activity which may be established on the site.

2.5 The existing Area Map information, relevant to the subject site, is provided below.

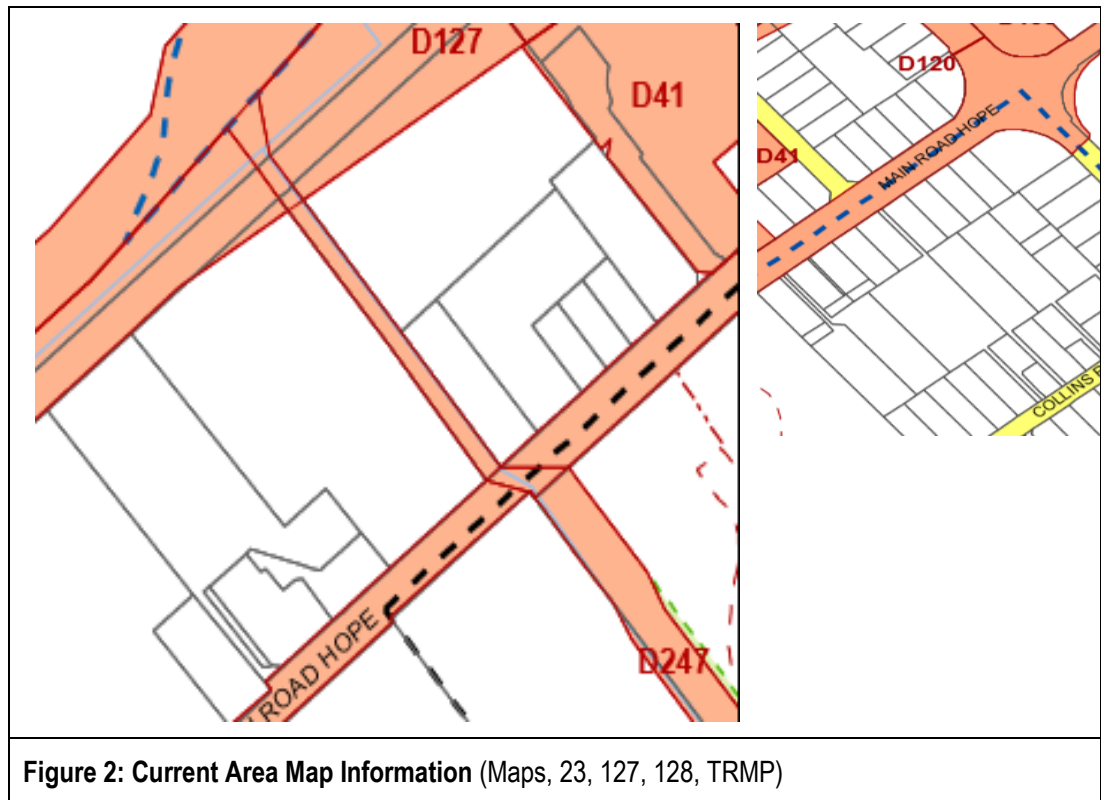


Figure 2: Current Area Map Information (Maps, 23, 127, 128, TRMP)

- 2.6 As shown on the following page, and within **Attachments 1 and 2**, Network Tasman Limited proposes to extend the boundaries of Schedule 17.5A over:
- Lot 1 DP 20392 (NL13A/1079)
 - Lot 1 DP 19736 (NL13A/1079)
- 2.7 Both allotments are contained within a single Certificate of Title, a copy of which is provided within **Attachment 3** of this Request.

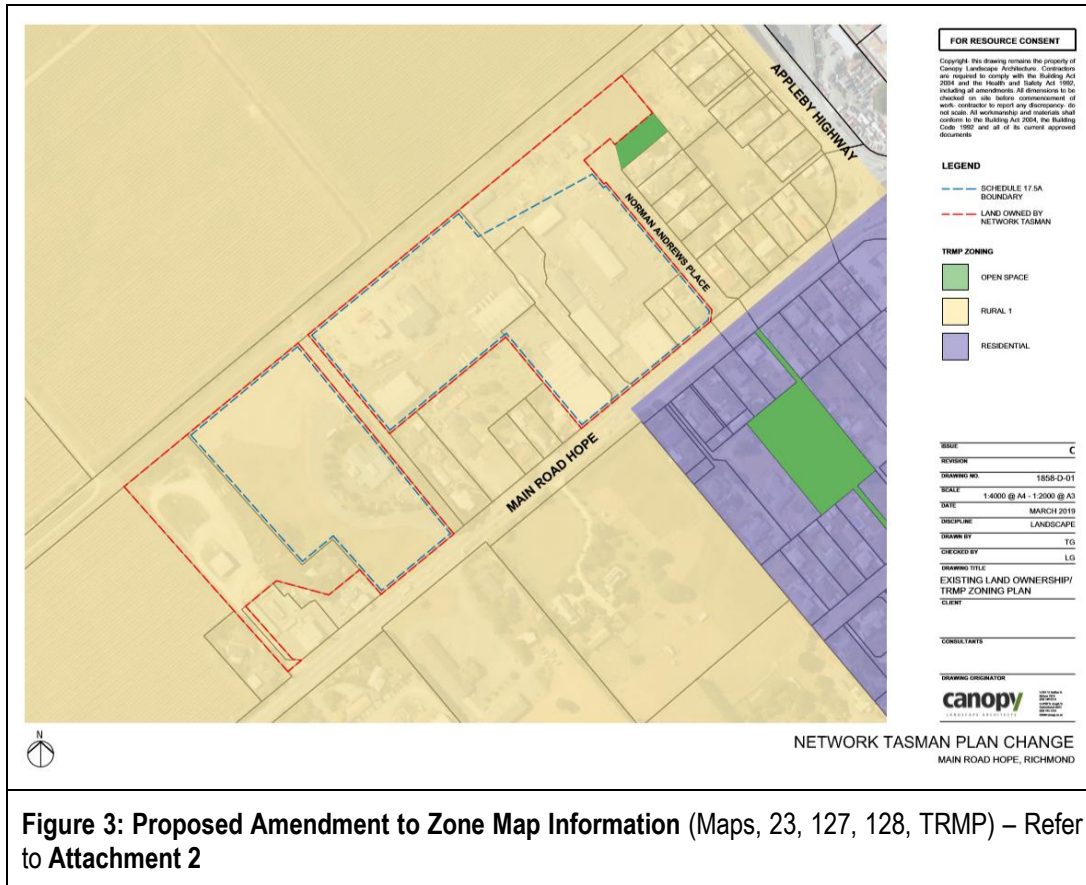


Figure 3: Proposed Amendment to Zone Map Information (Maps, 23, 127, 128, TRMP) – Refer to Attachment 2

Amendment 2: Rule 17.5.2.1(a)(xii) (Activities)

- 2.8 Rule 17.5.2.1 of the Plan lists the permitted land use activities for the Rural 1 Zone. All land use activities are permitted unless Rule 17.5.2.1 of the Plan states otherwise:

Any land use is a permitted activity that may be undertaken without a resource consent, if it complies with the following conditions. ... (p101, Chapter 17)

- 2.9 Following on from Rule 17.5.2.1, Rule 17.5.2.1(a) is headed “Activities” and states:

(a) *The activity is not:*

(xii) *on Lot 1 DP 20183, Lot 1 & 2 DP 435942, Lot 3 DP 435942, Lot 4 DP 435942, Lot 2 DP 4875 and Lot 3 DP 4875 (Main Road, Hope occupied by Network Tasman Ltd) (p102, Chapter 17)*

- 2.10 *Lot 1 DP 20183, Lot 1 & 2 DP 435942, Lot 3 DP 435942, Lot 4 DP 435942, Lot 2 DP 4875, Lot 3 DP 4875 are identified in Figure 4 below, and on the Plan provided within Attachment 1 of this Plan Change Request.*



Figure 4: Lot 1 DP 20183, Lot 1 & 2 DP 435942, Lot 3 DP 435942, Lot 4 DP 435942, Lot 2 DP 4875, Lot 3 DP 4875 (subject to Schedule 17.5A, TRMP) (refer to Attachment 1)

2.11 Pursuant to Rule 17.5.2.1(a)(xii) there are no permitted land use activities on Lot 1 DP 20183, Lot 1 & 2 DP 435942, Lot 3 DP 435942, Lot 4 DP 435942, Lot 2 DP 4875 or Lot 3 DP 4875 (Network Tasman Hope Depot).

2.12 Rule 17.5.2.3 then provides for land use activities at the Hope Depot as a controlled activity and refers to Schedule 17.5A:

17.5.2.3 *Controlled Activities (Land Use) – Site Specific Activity (Hope Depot)*

Refer to Schedule 17.5A (p106, Chapter 17)

2.13 Given that this Plan Change Request seeks to widen the land area covered by Schedule 17.5A, this Request seeks to expand the legal descriptions referred to in Rule 17.5.2.1(a)(xii). The following changes to Rule 17.5.2.1(a)(xii) are requested:

(a) *The activity is not:*

...

(xii) Lot 1 DP 20183, Lot 1 & 2 DP435942, Lot 3 DP435942, Lot 4 DP 435942, Lot 2 DP4875, and Lot 3 DP 4875, Lot 1 DP 20392 and Lot 1 DP 19736 (Main Road, Hope, occupied owned by Network Tasman Ltd)

- 2.14 The above change includes a technical amendment to clarify the sites are owned by Network Tasman although not all sites within the Schedule are occupied by Network Tasman.
- 2.15 The allotment references added to Rule 17.5.2.1(a)(xii) are identified in **Figure 5** below. Recent copies of the relevant certificate of title are provided within **Attachment 3** of this Plan Change Request.

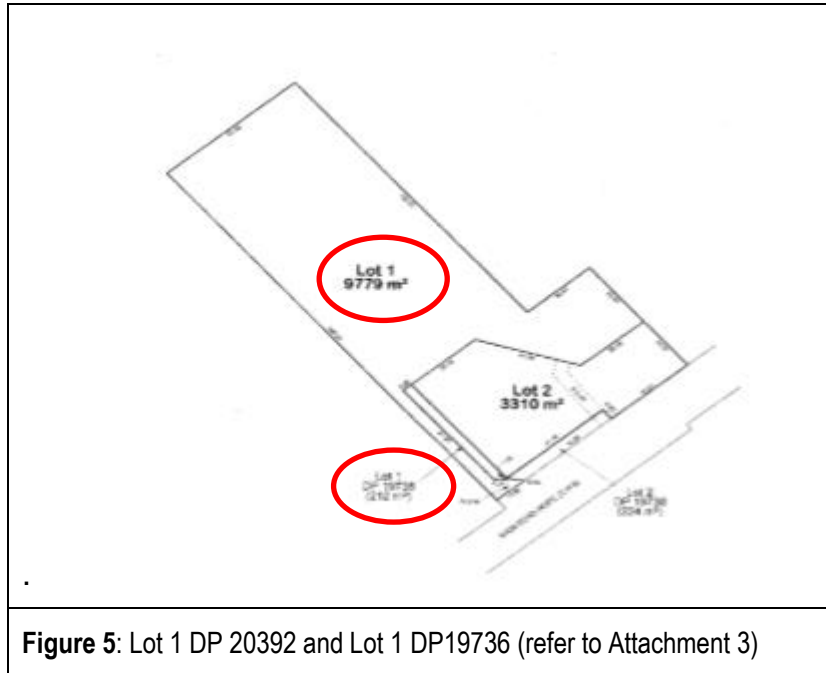


Figure 5: Lot 1 DP 20392 and Lot 1 DP19736 (refer to Attachment 3)

Amendment 3: Schedule 17.5A

- 2.16 The first part of Schedule 17.5A provides for Controlled Activity status on the Hope Depot Site, subject to compliance with the particular conditions.
- 2.17 As this Plan Change Request proposes to widen the area benefiting from Schedule 17.5A it is also necessary to add further legal descriptions to this rule. The following changes are requested:

Schedule 17.5A:Activities on Network Tasman Ltd Site at Main Road Hope

1. *Any land use on Lot 1 DP 20183, Lots 1 & 2 DP435942, Lot 3 DP435942, Lot 4 DP 435942, Lots 2 & 3 DP 4875, Lot 1 DP 20392 and Lot 1 DP 19736 is a controlled activity, if it complies with the following conditions: (p129, Chapter 17)*

Amendment 4: Schedule 17.5A – Activity Conditions

- 2.18 Schedule 17.5A lists the activities which are controlled (a) and conditions which the activity must comply with to constitute a controlled activity (b).

- 2.19 As this Plan Change Request proposes to add 2 additional allotments into the area benefitting from Schedule 17.5A it is necessary to review the activity conditions to ensure they are appropriate and relevant to the increased Schedule area.
- 2.20 No change is sought to the range of activities controlled under Schedule 17.5A (a).

Stormwater

- 2.21 Under Plan Change 50 it was identified that Lot 1 DP 20183 was the only part of the subject site that was largely undeveloped and not already fully sealed. Schedule 17.5A Rule 1(b)(vii) currently states:

(vii) Stormwater

Condition (p) as set out in rule 17.4.2.1.

For new development within Lot 1 DP 20183 (south-west of Reed Andrews Drain), the peak runoff rate during a 1 in 100 year storm event does not exceed the predevelopment peak runoff rate.

- 2.22 Lot 1 DP 20392 and Lot 1 DP 19736 contain approximately 4% impervious surface. Development within these allotments, therefore, has the potential to generate additional peak runoff which cannot be accommodated within the existing stormwater drainage network.
- 2.23 It is therefore proposed to amend Schedule 17.5A Rule 1(b)(vii) to include Lot 1 DP 20392 and Lot 1 DP 19736. The following change is proposed:

(vii) Stormwater

Condition (p) as set out in rule 17.4.2.1.

For new development within Lot 1 DP 20183, Lot 1 DP 20392 and Lot 1 DP 19736 (south-west of Reed Andrews Drain), the peak runoff rate during a 1 in 100 year storm event does not exceed the predevelopment peak runoff rate.

- 2.24 If this standard cannot be achieved then the proposal would become a discretionary activity.

Vehicle Access

- 2.25 Lot 1 DP 20392 and Lot 1 DP 19736 currently have direct access from State Highway 6 via crossing point CP68B. CP68B notice allows for "stock and/or associated farm vehicles and residential use". Following consultation with NZTA and consideration of the traffic effects associated with this access the following additional condition to Schedule 17.5A(b) is proposed:

(viii) Vehicle Access

Crossing Place CP68B (on Lot 1 DP19736) may only be used for vehicles to enter the site via a controlled access. All vehicles must exit the sites within Schedule 17.5A onto State Highway 6 (SH6) at Crossing Places CP66 or CP57 (on Lot 1 DP 435942).

Note: For the purposes of this condition 'controlled access' means an electronic entry only gate located at the site entrance in a manner which does not restrict access to Lot 1 DP 343453 from Main Road Hope. Access to the site will be restricted to services vehicles associated with the activity on the site. For the avoidance of doubt 'service vehicle' is intended to include trucks.

Amendment 5: Schedule 17.5A – Building Activity Conditions

- 2.26 Schedule 17.5A lists the conditions which all buildings must comply with (c).
- 2.27 As this Plan Change Request proposes to add 2 additional allotments into the area benefitting from Schedule 17.5A it is necessary to review the building conditions to ensure they are appropriate and relevant to the increased Schedule area.
- 2.28 The subject site (Lot 1 DP 20392 and Lot 1 DP 19736) does not have an existing connection to Council's reticulated wastewater system. Council's Development Engineer has advised that at the present time there is insufficient capacity in Council's reticulated wastewater network to allow a connection to the site.
- 2.29 The following condition is proposed as an addition to Schedule 17.5A to allow for a solution for wastewater disposal to be addressed at the time of development, or for connection to Council's reticulated wastewater system should capacity be available at the date of development.

(viii) Wastewater Disposal

All buildings which generate wastewater are connected to a reticulated wastewater system where the service is available.

OR

The discharge complies with section 36.4 of this Plan.

Amendment 6: Schedule 17.5A – Matters over which control is reserved

- 2.30 Under Plan Change 50 a list of matters over which control is reserved were added to Schedule 17.5A.
- 2.31 The current Plan Change seeks to include Lot 1 DP 20392 and Lot 1 DP 19736 (68 Main Road, Hope) into the area covered by Schedule 17.5A. An amendment is required to the matters of control numbers 1 and 5 to reflect that 68 Main Road, Hope is now part of the Scheduled site. An additional matter of control is also proposed.
- 2.32 Matter 1 currently states:
- 'In respect of buildings within 10 metres of the State Highway 6 boundary, the appearance of buildings'*
- 2.33 Based on the recommendations contained within the Canopy Landscape Assessment the effects on the visual amenity of the area from the ex-railway reserve (Great Taste Trail), sited to the north of 68 Main Road, Hope would be mitigated if buildings have an appropriate level of detail to provide visual interest from this view.

2.34 It is recommended that matter 1 be amended to the following:

'In respect of buildings within 10 metres of the State Highway 6 boundary and/or within 10 metres of the railway reserve, the appearance of the building.'

2.35 Matter 5 currently states:

'In respect of buildings within 10 metres of the north western or north-eastern boundary with 68 Main Road, Hope (Lot 1 DP 20392) (while this property is still in residential use) whether the design of the building and associated landscaping has addressed amenity values from this residential property including outlook, privacy and solar access.'

2.36 Taking account of the recommendations contained with the Canopy Landscape Assessment and the inclusion of 68 Main Road, Hope within the schedule, the following amendment to matter 5 is proposed:

'In respect of buildings within ~~10~~ 50 metres of the ~~north western or north-eastern~~ boundary with 68 Main Road, Hope (Lot 1 DP 20392) south western boundary with 82 Main Road, Hope (Pt Sec 114 Waimea East DIST) (while this property is still in residential use) whether the design of the building and associated landscaping has addressed amenity value from this residential property including outlook, privacy and solar access.'

Amendment 7

2.37 The Tonkin and Taylor Flood Hazard assessment within Attachment 6 considers the potential effects of flood hazard in relation to potential development on the site. The following condition is proposed to ensure that overland flow paths are adequately maintained and protected from future development.

2.38 To mitigate the potential for development to adversely affect overland stormwater flows it is recommended to amend Schedule 17.5A Rule 1(c) by adding an additional condition:

(viii) Stormwater

- a) The development provides for overland flood flow paths to cross the post development site, and retains the pre-development upstream entry and downstream exit points of the overland flood flow to and from the site; and
- b) The flood flow path surface is constructed or treated to prevent erosion of the surface.

Amendment 8

2.39 Following consultation with NZTA concerns were raised over potential future effects of traffic generation in relation to the use of Crossing Place CP68B. Two additional matters of control are therefore proposed to allow Council the ability to review consent conditions under section 128 of the Act in relation to traffic effects should those effects have an adverse effect on the safe and efficient operation of the State Highway. A further matter is recommended which will allow consideration of traffic effects in the event that an activity is proposed for the site which will generate higher than

anticipated traffic effects. This additional matter restricts Council to considering NZTA as the only potentially affected party. These matters are proposed in deference to the concerns which NZTA have in relation to increased traffic effects generated by proposed activities in relation to the inclusion of 68 Main Road Hope within the Schedule boundaries.

2.40 It is therefore recommended to add the following additional matters over which Council has reserved control:

(6) The purpose and timing of any review of conditions of consent (Section 128 of the Act) in relation to traffic effects.

(7) The effects of trip generation where the estimated number of vehicles entering the site via Crossing Place CP68B exceeds 40 Equivalent Car Movements (ECM) per day with New Zealand Transport Agency being the only potentially affected party.

Note: For the avoidance of doubt Equivalent Car Movement per day (averaged over a year) is defined as follows in relation to the entry only Crossing Place CP68B:

- 1 car entering the property = 1 equivalent car movements
- 1 truck entering property = 3 equivalent car movements
- 1 truck and trailer entering property = 5 equivalent car movements

3.0 Section 32 Analysis

3.1 The Duty

3.2 Section 32 is entitled 'Requirements for preparing and publishing evaluation reports'

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

- (a) examine the extent to which the objectives of the proposal being evaluated are the most appropriate way to achieve the purpose of this Act; and
- (b) examine whether the provisions in the proposal are the most appropriate way to achieve the objectives by—
 - (i) identifying other reasonably practicable options for achieving the objectives; and
 - (ii) assessing the efficiency and effectiveness of the provisions in achieving the objectives; and
 - (iii) summarising the reasons for deciding on the provisions; and
- (c) contain a level of detail that corresponds to the scale and significance of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the proposal.

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

- (a) identify and assess the benefits and costs of the environmental, economic, social, and cultural effects that are anticipated from the implementation of the provisions, including the opportunities for—
 - (i) economic growth that are anticipated to be provided or reduced; and
 - (ii) employment that are anticipated to be provided or reduced; and
- (b) if practicable, quantify the benefits and costs referred to in paragraph (a); and
- (c) assess the risk of acting or not acting if there is uncertain or insufficient information about the subject matter of the provisions.

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

- (a) the provisions and objectives of the amending proposal; and
- (b) the objectives of the existing proposal to the extent that those objectives—
 - (i) are relevant to the objectives of the amending proposal; and
 - (ii) would remain if the amending proposal were to take effect.

(4) If the proposal will impose a greater or lesser prohibition or restriction on an activity to which a national environmental standard applies than the existing

prohibitions or restrictions in that standard, the evaluation report must examine whether the prohibition or restriction is justified in the circumstances of each region or district in which the prohibition or restriction would have effect.

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

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

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

(5) *The person who must have particular regard to the evaluation report must make the report available for public inspection—*

(a) *as soon as practicable after the proposal is made (in the case of a standard or regulation); or*

(b) *at the same time as the proposal is notified.*

(6) *In this section,—*

objectives means,—

(a) *for a proposal that contains or states objectives, those objectives:*

(b) *for all other proposals, the purpose of the proposal*

proposal means a proposed standard, statement, national planning standard, regulation, plan, or change for which an evaluation report must be prepared under this Act

provisions means,—

(a) *for a proposed plan or change, the policies, rules, or other methods that implement, or give effect to, the objectives of the proposed plan or change:*

(b) *for all other proposals, the policies or provisions of the proposal that implement, or give effect to, the objectives of the proposal.*

3.3 Section 32 of the Resource Management Act 1991 requires that consideration is given to the different and most appropriate means available to address environmental issues and desired outcomes to achieve the purpose of the Act. The Section 32 assessment process is designed to generate the reasons why change to a provision is appropriate and establishes a formal process for working out how best to implement this change.

3.4 The Issue

3.5 Plan Change 50 considered and subsequently approved broadening the scale of Schedule 17.5A to include additional land under the ownership of Network Tasman. The allotments included in Schedule 17.5A were not all occupied by Network Tasman or related business, however, there was and continues to be a common theme of urban / light industrial activities that are incompatible with the underlying zoning of Rural 1.

3.6 Since Plan Change 50 was approved Network Tasman has acquired 68 Main Road, Hope and now seeks this plan change request to Schedule 17.5A to include the two allotments which comprise this site within the Schedule.

- 3.7 68 Main Road, Hope is sited directly adjacent to land contained within Schedule 17.5A. The site has access from State Highway 6, however, road frontage is limited to the width of the site access. To the south east lies 66 and 70 Main Road, Hope which are currently utilised for a storage container business, Caltex petrol station and a mechanics workshop. Despite these sites also being zoned Rural 1 it is clear that both 66 and 70 Main Road and 68 Main Road do not have the expected characteristics of a Rural 1 site.
- 3.8 The pattern and character of land use within and surrounding the Scheduled Site in no way relates to the underlying Rural 1 zoning. The land instead is urban and light industrial in character. 17.5.20 'Principal Reasons for Rules' of the TRMP describes the Scheduled Site as an industrial land resource.
- 3.9 Schedule 17.5A was first introduced in recognition of this disparity between zoning and land use. It was also introduced in recognition of the value of the former Network Tasman Depot for light industrial and other (than Rural) purposes.
- 3.10 68 Main Road, Hope has limited scope for productive potential considering historic and current land usage, size and location relative to other sites utilised under Schedule 17.5A for industrial purposes. The acquisition of 68 Main Road by Network Tasman will allow them to further increase their activities beyond the confines of the existing sites. Resource consent would be required as a Discretionary Activity to facilitate use of this site by Network Tasman for an industrial or commercial purpose if the site were not incorporated into Schedule 17.5A.
- 3.11 Given the proximity of 68 Main Road, Hope and the connection to the Scheduled site a change to the Tasman Resource Management Plan Schedule 17.5A is considered to be the most appropriate means of addressing this issue.

3.12 Objectives and Policies

- 3.13 The current objectives and policies of the Tasman Resource Management Plan remain valid and appropriate. No changes to objectives and policies are requested.

3.14 The Methods Available

3.15 Plan Change versus other methods

- 3.16 The consideration of "methods" in this chapter deals with the "methodology" (or *vehicle*) chosen (i.e. a privately initiated plan change) to achieve the objectives and the purpose of the Act. The methods considered include:

- Do nothing / Status Quo;
- Await a further review of the TRMP and/or TRPS;
- Privately initiated Plan Change Request;
- A Resource Consent application for the overall site development;
- Other methods, such as voluntary agreements, by-laws, covenants, education, research.

- 3.17 The Resource Management Act indicates no preference between the choice of plan review, plan change request, or resource consent application. Attachment 10 contains

a full costs, benefits and risks matrix to analyse each option against the values which are important to Network Tasman and the development goals for the site.

- 3.18 Given that the district plan is the most appropriate means of managing the use and development of natural and physical resources, the “*other methods*” listed above are considered to be less appropriate and unrealistic, and hence much less effective or efficient.
- 3.19 The method chosen to privately initiate a plan change proposes to proactively update and improve the existing planning framework. This plan change request is also intended to improve the efficiency of the controls by reducing the financial costs associated with obtaining resource consents. The cost, benefits and risks matrix fully supports this chosen method.
- 3.20 In summary, a privately initiated plan change would provide the most effective and efficient means of achieving the purpose of the Act. The other methods available would certainly result in less efficient outcomes.
- 3.21 The gathering of detailed background information and the integrated manner in which this plan change request has been sought, is considered to have maximized the effectiveness of this method (including the individual amendments proposed).

3.22 Appropriateness of the Selected Amendments

3.23 Amendment 1: Planning Maps 23, 127, 128

3.24 Expanding the area covered by Schedule 17.5A would, in conjunction with the other amendments requested, have the benefit of:

- a) immediately identify to readers of the TRMP that the Rural 1 zone provisions are not relevant to this site;
- b) enable an appropriate range of uses that would achieve the purpose of the Act;
- c) introduce a regulatory framework that is logical and more relevant;
- d) provide for a more efficient use of an existing land resource on the fringe of Richmond, and reduce administration and compliance costs.

3.25 On the flip side, not acting would incur the parallel negative costs. Risks of not acting due to uncertainties or insufficient information have been avoided through the commissioning of specialist assessments of traffic, landscape and flooding impacts (refer to **Attachments 4 - 7**).

3.26 Amendment 2: Rule 17.5.2.1(a)(xii) (Activities)

3.27 This amendment merely involves the inclusion of additional legal descriptions into Rule 17.5.2.1(a)(xii) to take account of the additional properties to be included within Schedule 17.5A.

- 3.28 These amendments go hand-in-hand with the requested amendment to the planning maps. This amendment is therefore consequential in nature and designed to ensure these amendments are properly integrated into the current planning framework.
- 3.29 A technical amendment to 17.5.2.1(a)(xii) is requested to clarify that not all allotments are occupied by Network Tasman but all are owned by Network Tasman. This technical amendment is considered appropriate to accurately reflect ownership and occupation of allotments within the Schedule boundaries.
- 3.30 There are no costs or alternatives to this amendment that could be more efficient or effective. This amendment is considered to be appropriate and necessary.
- 3.31 Amendment 3: Schedule 17.5A
- 3.32 This amendment has the same purpose as Amendment 2 described above in that additional legal descriptions must be added into Schedule 17.5A in order to fully integrate the widened scope of Schedule 17.5A.
- 3.33 As with Amendment 1, the proposed amendment to Schedule 17.5A goes hand-in-hand with the requested amendment to the planning maps. This amendment is therefore consequential in nature and designed to ensure these amendments are properly integrated into the current planning framework.
- 3.34 Amendments 4: Vehicle Access
- 3.35 Under Plan Change 50 a full assessment of the traffic effects was undertaken and the existing activities exclude transport depots or storage of goods activities which could have an effect on the safe and efficient operation of State Highway 6. These activities are therefore Restricted Discretionary Activities.
- 3.36 The existing site access to 68 Main Road, Hope allows for “stock and/or associated farm vehicles and residential use” under the NZTA Crossing Place notice. Restricting the existing access to an ‘entry only’ access and requiring a connecting road between the application site and other lots within the Schedule site will allow for traffic flow which ensures the safe and efficient operation of State Highway 6.
- 3.37 The installation of an electronic gate to ensure controlled access to the site which will effectively limit the number of vehicles using the site is proposed. The gate will be sited so as not to restrict access to 70 Main Road Hope which also utilises Crossing Place CP68B.
- 3.38 The applicant has consulted with NZTA who have agreed that this condition provides a level of certainty around the restricted use of CP68B to entry only and for a limited number of vehicles.
- 3.39 Amendments 4: Stormwater
- 3.40 Amendments 4 also addresses the stormwater drainage constraints and flooding risks identified by Tonkin & Taylor Limited. The Flooding Assessment is provided within Attachment 6 of this Request.

- 3.41 Under Plan Change 50 it was identified that Lot 1 DP20183 was the only part of the then proposed Schedule Site that remained largely undeveloped with large pervious/grassed areas. Any further development within Lot 1 DP20183 would therefore have the potential to increase peak runoff. Condition (b)(vii) sought to ensure careful management of stormwater on this site to mitigate the effects of any further development on the peak runoff rates.
- 3.42 Lot 1 DP20392 and Lot 1 DP19736 contain approximately 4% impervious surface. Development within these allotments would therefore raise the same concerns in relation to peak runoff as development within Lot 1 DP20183. Amendment 4 seeks to include Lot 1 DP20392 and Lot 1 DP19736 within condition (b)(vii) to manage stormwater on-site or require resource consent as a discretionary activity.
- 3.43 Amendment 5: Wastewater
- 3.44 Council's Development Engineer has advised that at present there is insufficient capacity in the reticulated wastewater network in the location of the subject site to allow for a new connection. Amendment 5 seeks flexibility to allow for a wastewater solution to be developed when the site is developed. In the event that there remains insufficient capacity in the system at development stage an onsite solution will be designed, and the details provided with the resource consent application. The site is not in any special discharge overlays under the TRMP.
- 3.45 Amendment 6: Schedule 17.5A – Matters over which control is reserved
- 3.46 In order to mitigate potential adverse effects from development on Lot 1 DP20392 and Lot 1 DP19736 (68 Main Road) the existing matters of control are requested to be updated.
- 3.47 The proposed amendments to the matters of control would maintain the amenity of the receiving environment, in particular adjoining residential dwellings, while providing an appropriate level of certainty to the owner(s) of the land as to what may be undertaken as a controlled activity.
- 3.48 Amendment 7: Stormwater Overland Flow Paths
- 3.49 Council's Stormwater Engineer has recommended that a condition requiring pre-development upstream entry and exit points for overland stormwater flow paths are maintained post development and that any flood flow path surface is constructed and / or treated to prevent erosion.
- 3.50 These additional conditions are supported by the Tonkin & Taylor report contained within Attachment 6 and are appropriate to mitigate the potential effects of development on overland flows which currently exist across the site.
- 3.51 Amendment 8: Schedule 17.5A – Matters over which control is raised – Traffic
- 3.52 The proposed matters of control in relation to traffic effects in association with Crossing Place CP68B and a review condition for traffic effects are recommended as a means of mitigating the concerns raised by NZTA over the use of Crossing Place CP68B and wider traffic effects of activities.

4.0 Assessment of Environmental Effects (AEE)

4.1 Introduction

- 4.1.1 This AEE has been prepared to satisfy Clause 22(2) of the First Schedule of the Act, which requires:

Where environmental effects are anticipated, the request shall describe those efforts, taking into account clauses 6 and 7 of Schedule 4, in such detail as corresponds with the scale and significance of the actual or potential environmental effects anticipated from the implementation of the change, policy statement or plan.

- 4.1.2 The relevant actual or potential effects are those anticipated from administering the requested Plan Changes listed and explained within Section 2 of this Request.
- 4.1.3 The following also summarises the specialist reports / technical documents supporting this request as provided within **Attachments 4-7**. This summary does however also place each of the relevant specialist reports into context, with reference (at times) to the various statutory and non-statutory planning documents, including the significant resource management issues identified in these documents.
- 4.1.4 A description of the proposal (i.e. Plan Change Request) is provided within Sections 1 and 2 of this report.
- 4.1.5 Possible alternatives, as required by clause 6(1)(a) and 6(1)(h) of the Fourth Schedule, are not described in this report as no significant adverse effects on the environment have been identified and no adverse effects on the exercise of protected customary rights have been identified. The scale and nature of the activity enabled by the Change has been the subject of a thorough assessment therefore avoiding such significant impacts.
- 4.1.6 This request does not relate to rules regulating the use of hazardous substances or installations. A risk assessment, as required by clause 6(1)(c) of the Fourth Schedule, is not therefore provided.
- 4.1.7 Clause 6(1)(e) of the Fourth Schedule requires a description of mitigation measures. Such measures (methods) are discussed in detail, particularly (but not exclusively) in relation to the actual or potential effects relating to traffic (Section 4.3), visual amenity (Section 4.6) and flooding (Section 4.7 and 4.8). As a reminder, the supporting technical reports provide greater detail on specific issues.
- 4.1.8 Section 6 of this Request specifically identifies the persons affected by this proposal. Section 6 also explains the consultation undertaken and the views expressed from the persons consulted. The obligations for consultation stated under Clause 3 of the First Schedule apply to the Consent Authority during the preparation of a proposed policy statement or plan.
- 4.1.9 The need (or otherwise) for monitoring is also addressed within this assessment as required by clause 6(1)(g).
- 4.1.10 While the consideration of the “permitted baseline” is only a matter that “may” be taken into account when considering the effects of resource consent applications (s104), there is no

equivalent provision in the assessment of plan change requests. Doing so is however considered to be good practice and so comparisons with the effects of permitted activities are made within this Assessment. This is in recognition that such comparisons enable a full understanding of the issues, while providing another means of assessing the significance of the effects of implementing the Plan Change.

4.2 The Site and Environment

4.2.1 The site the subject of this Plan Change Request has been described in Section 2.0 above and Sections 4.1-4.10, with significant supporting information also provided within Attachments 1 to 9 of this Request.

4.2.2 The flat topography, the established mixture of non-rural based activities on the subject land and surrounding sites along with the presence of State Highway 6 combine to characterise this site.

4.2.3 The landscape assessment report provided within Attachment 5 states:

'Current landscape character is in an ecologically degraded state, due to its past use for pastoral farming, and its recent use for a mixture of residential and light rural industrial activity . The topography has not been changed and remains in a flat open state, with vegetation consisting largely of exotic grasses. The large gum tree that until recently was located near the western boundary has recently been removed, as has the amenity trees and planting.....Current landuse has resulted in a landscape character with low-moderate landscape amenity and a relatively open semi-rural character.'

4.3 Traffic Effects

4.3.1 The land subject to this plan change currently has an existing site access from State Highway 6, located along the south western boundary of the site. The access is approximately 9 metres long and provides two-way traffic movements. The vehicle access is also utilised by vehicles entering the Caltex Fuel Stop located at 70 Main Road, Hope, to the south of the subject site. The existing crossing is wide enough to provide for the turning requirements for trucks that use the service station and existing site.

4.3.2 NZTA have the listed access for 68 Main Road, Hope as Crossing Place 68B (CP68B). CP68B notice allows for 'stock and/or associated farm vehicles and residential use'. It should be noted that prior to the submission of this plan change request the residential use of the site has ceased with the residential dwelling demolished.

4.3.3 A full traffic assessment was undertaken as part of Plan Change 50 and an assessment of all existing access points to sites within Schedule 17.5A was provided. Consultation with NZTA was also undertaken at that time and the report from Urbis Ltd dated 9th November 2012 concluded the following:

2.9 Overall Conclusion

The overall conclusion from the SIDRA analysis of twelve scenarios (0.2, 0.3 and 0.41 generation rates for the AM and PM peak periods at two site access points) is that both CP57 and CP66 have the geometric capacity to cater for increased site generated traffic volumes such that the potential traffic effects of the plan change proposal on the operation of State Highway 6 at the

two access locations will be very minor.

The exiting performance of CP57 in the weekday evening peak period would be improved if the exit is marked with separate left and right turn exit lanes.

Despite the results of this analysis, consultation with the New Zealand Transport Agency (NZTA) has been unable to resolve their concern of potential impediment to southwest-bound through traffic flow if a queue of multiple HGV's occurred in either right turn bay. While this scenario is unlikely to occur, it has been agreed with the NZTA to insert some new rules into the District Plan that make transport depots and storage facilities a restricted discretionary activity with the discretion restricted to the potential effects of the operation of CP57 and CP66 on the operation of the State Highway and with the New Zealand Transport Agency as the only identified affected party. This rule will enable the continued operation of CP57 and CP66 to be monitored as the Hope Depot site is redeveloped over time.

- 4.3.4 Based on the above conclusion and agreement with NZTA transport depots (except on Lot 1 DP 435942) and storage facilities are not listed as controlled activities. The proposed amendments under this plan change request do not allow for transport depots or storage facilities on either Lot 1 DP20392 or Lot 1 DP19736.
- 4.3.5 A Traffic Assessment which outlines the actual and potential traffic effects associated with this plan change request has been provided by Traffic Concepts Ltd, a full copy is contained within Attachment 4. This assessment has been updated since the original application to include additional information to address matters raised by NZTA following further consultation with them.
- 4.3.6 The Traffic Assessment analyses the existing environment and access, crash history, traffic flow and generation. The Assessment also considers concerns raised by NZTA about the continued use of the existing access (CP68B), particularly taking into account the potential connections to adjacent industrial land uses and the already approved high volume connections to SH6 (CP57 and CP66).
- 4.3.7 As a result of this consultation with NZTA and detailed analysis of the access and potential uses of the subject site the Traffic Assessment considers that allowing vehicles to exit using the existing at 68 Main Road, Hope onto State Highway 6 would be unsafe. Accordingly, it is proposed to restrict the existing access at 68 Main Road Hope to a controlled access for service vehicles only to enter the site. Access for all other vehicles to the site will be a via a new road from the existing internal access road next to the Network Tasman offices. All vehicles will exit via the accesses (CP57 and CP66) approved under Plan Change 50.
- 4.3.8 Specialised intersection modelling software (SIDRA) analysis carried out as part of the traffic assessment for Plan Change 50 concluded that the two existing intersections into the Schedule 17.5A site would accommodate flows generated by existing sites as well as sensitivity testing, which doubles the most likely trip rates that would be expected from industrial activities. The Traffic Concepts report considers that the SIDRA modelling carried out by Urbis under PC50 is conservative. It is also important to further consider that the site area of 68 Main Road Hope will limit the type of activity which can be accommodated and consequentially the traffic effects.
- 4.3.9 As a means of mitigating concerns raised by NZTA in relation to the performance of Crossing Place CP68B and general traffic effects, further matters of control are proposed to allow Council to further consider the traffic effects associated with any activity

establishing on the site, particularly if the activity is estimated to result in more than 40 Equivalent Car Movements per day entering Crossing Place CP68B. These additional matters of control ensure that activities which utilise Crossing Place CP68B are limited to a volume of traffic which is appropriate to avoid adverse effects on the safe and efficient use of the State Highway. Should any activity establish which has a higher than anticipated volume of traffic using CP68B any resource consent application would need to be accompanied by a traffic assessment to consider these effects and Council could then consider NZTA an affected party if adverse effects are deemed minor or more than minor+.

4.3.10 The updated Traffic Concepts report concludes:

'The analysis and assessment of the proposal to allow industrial activities on a small area of Rural 1 land shows that the expected traffic movements from the site can be accommodated on the surrounding road network.

The proposed access arrangement will see trucks enter the site through the existing driveway at 68 Main Road Hope and exiting via a new road and existing intersections onto State Highway 6. This arrangement is necessary to preserve the land area for new activities and reduce inefficiencies arising from large areas set aside for onsite turning. All other traffic will use the existing accesses that were assessed as a part of PC50.

The Urbis report provided a robust traffic analysis on traffic flows and access performance. This analysis has been reviewed and used to understand the likely impacts of this increase in industrial land use. The conclusion of the analysis is that the intersections considered as part of PC50 can accommodate the expected flows from this development.

In consideration of the safety matters, the proposal can be accommodated within the surrounding road network with no discernible change in the existing levels of safety. This is due to the well laid out intersection that will be used by traffic to the new zone. Also the restriction on the existing access to only allow trucks to enter the driveway can be done safely.

Overall the proposal to change the zone from Rural 1 to Industrial can be supported from a transportation perspective.'

4.3.11 The above conclusion supports the outcomes that would arise from this Plan Change Request.

4.4 Residential Amenity

4.4.1 An assessment of the actual and potential effects of this Plan Change Request on residential amenity values is also important. This is because there are some residential dwellings located in close proximity to the subject site. It is also evident that Schedule 17.5A was established with an intention to avoid adverse effects on residential amenity values.

4.4.2 Plan Change 50 fully assessed the potential effects on the amenity of residential properties surrounding the existing Schedule Site. The assessment included matters such as noise effects and visual amenity effects. Several matters of control were

included in Schedule 17.5A under Plan Change 50 to ensure that the amenity of surrounding residential properties would be mitigated. This plan change does not propose to amend these matters of control other than to make changes to ensure their relevance to the increased area of the Scheduled Site.

- 4.4.3 As this Plan Change Request proposes to extend Schedule 17.5A over Lot 1 DP 20392 and Lot 1 DP 19736 (68 Main Road, Hope) the adjacent residential activity has been identified in **Figure 6** below.



- 4.4.4 In order to properly assess and determine the actual or potential effects of this Plan Change Request on residential amenity values one must also have regard to: the current characteristics of the environment within which these residential activities are located, and also; have consideration to the location/setback and nature of activities that this Plan Change seeks to provide for.
- 4.4.5 In terms of existing residential amenity values, it is appropriate to acknowledge that the identified residential activities are located within a receiving environment that is strongly influenced by the State Highway traffic environment. Traffic noise dominates the residential character of this environment, particularly those residential dwellings with direct frontage to the Highway.

4.4.6 Also of relevance is the nature of activities that would be enabled if this Plan Change Request was granted. Schedule 17.5A provides for industrial activities as a controlled activity subject to various performance standards, including:

- (i) compliance with the permitted activity noise standards contained within Rule 17.4.2.1(l); and
- (ii) hours of operation being limited to 7.00am-7.00pm, Monday to Saturday inclusive

4.4.7 Rule 17.4.2.1(l) requires that activities not exceed the following noise performance standards levels when measured at or within any boundary of any site within a Residential or Tourist Services Zone, or at or within the notional boundary of any dwelling in the Rural, Rural Residential or Papakainga zones:

	Day	Night
L_{eq}	55 dBA	40 dBA
L_{max}	----	70 dBA
N.B.	<i>Day = 7.00am to 9.00pm, Monday to Friday, inclusive of 7.00am to 6.00pm Saturday (but excluding public holidays)</i>	
	<i>Night = all other times excluding public holidays</i>	

4.4.8 The above noise performance standards therefore apply the same noise limits on Schedule 17.5A as if the site was used for Industrial purposes. Appropriate daytime and night-time standards are imposed. However, with operating hours being limited 7.00am-7.00pm (Schedule 17.5A(b)(i)), the Schedule requires a much tougher standard on night time effects than does the Rural 1 zone or Industrial Zone.

4.4.9 In addition, Schedule 17.5A only provides for a specific range of activities, including storage of goods, offices, light manufacturing activities, trade workshops, specific retail activities, laboratories and transport depots. Heavy industrial or resource processing industries are not provided for as a controlled activity.

4.4.10 The future development of Lot 1 DP 20392 and Lot 1 DP 19736 in accordance with Schedule 17.5A has the potential to impact on the residential properties identified in **Figure 3**. However, with the dominant influence of State Highway 6, and a limitation on operating hours of 7.00am to 7.00pm, it is considered that there is very little risk to the residential noise amenity of the identified properties.

4.4.11 For the reasons set out above, Schedule 17.5A was established with a set of performance standards that were designed to maintain the residential amenity of properties that exist within the receiving environment. Development of the land within Schedule 17.5A has seen a range of different light industrial and commercial activities that are compatible in this environment as envisaged by the Schedule.

4.4.12 Against the background noise generated by State Highway 6, it is considered that the proposed expansion of Schedule 17.5A would not generate any unacceptable adverse noise or nuisance effects. The current Schedule 17.5A noise standards and operating

hours would ensure that new activities established on the subject land would maintain the residential amenity of adjacent properties.

4.4.13 Acoustic Engineering Services (AES) have been commissioned to provide an Assessment of Environmental Noise Effects, their full report is contained within Attachment 7.

4.4.14 The noise assessment report examines the existing noise levels along with the potential noise generated by activities covered under Schedule 17.5A on the subject site. The report also assesses the potential noise effects in relation to the Tasman Resource Management Plan rules, New Zealand Standard 6802 and World Health Organisation guidelines.

4.4.15 The Acoustic Engineering Services report concludes:

'2.4 Discussion regarding appropriate noise limits

Based on the above, we observe that the Tasman Resource Management Plan noise limits outlined in Schedule 17.5A are the same as noise limits for the Rural 1 zone and more stringent than the guidelines recommended by WHO and NZS 6802:2008 especially in terms of the early commencement of the 'night time' period. Daytime noise levels from traffic on Main Road Hope also exceed 55 dB LAeq at the location of the closest dwellings.

We therefore consider that compliance with the Tasman Resource Management Plan noise limits outlined in Schedule 17.5A at the notional boundary of any dwelling will be appropriate to ensure noise emissions are reasonable, and that effects on neighbouring residential properties are acceptable.

3.0 NOISE GENERATED BY THE ACTIVITY OVER THE PROPOSED SITE

We understand that if the Schedule is extended, the following uses will be a controlled activity if they meet the noise rules outlined in 2.1.2 above and operate between 7:00 am and 7:00 pm Monday to Saturday as outlined in Schedule 17.5A, as follow:

- *The storage of goods*
- *Offices*
- *Light manufacturing activities*
- *Trade workshops*
- *The retail sale of goods which are either manufactured or serviced on the site, provided that the retail display area does not exceed 100 square metres*
- *Laboratories*
- *Transport depots*

Considering the similar expected noise levels from the above sources, we can confirm that the noise limits required by Schedule 17.5A are achievable and realistic; however,

physical and managerial noise mitigation would be required for louder noise sources, for example heavy vehicles on the access, workshops and the like.'

4.5 Productive Values / Cross Boundary Effects

4.5.1 Despite the subject land having an underlying Rural 1 zoning, the land is not currently used for rural purposes. Aerial photographs from 1940-1949 and 1980-1989 indicate the site has not historically been used for horticultural purposes. The property file provides evidence of unconsented use of the land for a truck wash facility and effluent dump as recent as 2011.

4.5.2 It is considered that the proposed expansion of Schedule 17.5A would not have any impact whatsoever on productive land use values. Nor would the proposed Change create or result in any new or more sensitive cross boundary impacts. Residential activity is not proposed.

4.6 Visual Amenity

4.6.1 It is appropriate to consider the visual effects of this Plan Change. In addition, with part of this site fronting State Highway 6 and being at the southern entranceway to Richmond, there is an expectation that the transition from the rural to urban land uses would be a gradual one. This section of the assessment will therefore consider the likely visual outcomes from expanding the Schedule over the subject properties.

4.6.2 Firstly, as a controlled activity, the Schedule requires that buildings be setback 3.0m from boundaries and 5m from property boundaries occupied by a dwelling. Furthermore, a condition of control requires amenity plantings on the boundary with any adjoining site used either for residential purposes, the ex-railway reserve or State Highway.

4.6.3 The subject site (Lot 1 DP 20392 and Lot 1 DP 19736) has minimal road frontage with the State Highway (limited to the width of the access) although the site is visible along the State Highway from the north east. The site is, however, open to the ex-railway reserve (Great Taste Trail) to the north west of the site and borders a residential property to the south west (82 Main Road, Hope).

4.6.4 The actual and potential adverse landscape effects that may arise from the amendments proposed by this Request have been discussed and addressed in the *Landscape Assessment* provided within **Attachment 5** of this Request. Furthermore, amendments to the matters of control under Schedule 17.5A (refer to Section 3.44) will mitigate the potential effects on visual amenity which may arise as a result of development on the subject site

4.6.5 The conclusion and recommendations to this *Landscape Assessment* are provided below:

CONCLUSION

55. *In the immediate environment, there will be a moderate adverse visual effect without mitigation when viewed from the cycleway that runs along the northern boundary, and a moderately-high visual effect from the neighbour to the*

southwest when viewed from the upper gable. This is due to the increased value associated with views from a recreational area, and the change in landscape character associated with the introduction of a greater site density that differs from rural character. Visual effects and magnitude of change from the State Highway and east is low due to the modification to the landscape character, and screening from land within Schedule 17.5A (which is land owned by the applicant).

56. *Current landscape character has weakly defined boundaries that do not clearly relate to topography or notable elements in the landscape and surrounded by residential and commercial/light industrial character to the south, southwest and east. This lack of definition in landscape character is less susceptible to change. Overall, the landscape can absorb the change in character, and this change will simplify this part of the landscape that currently is a jumble of different character areas, with the site neither rural nor light industrial in character. Increasing the size of Schedule 17.5A will create a more definite edge between rural and light industrial character.*
57. *The change in landscape character to one that can have up to 65% built form, will represent a move from the relatively open character of the site (which is more aligned with open rural character) that has the capacity for one building up to 12m high; to one that has the capacity for 65% coverage and several buildings up to 10m high. There is the potential to improve visual amenity values along the Great Taste Trail that has oblique views into the site currently. Schedule 17.5A does provide for mitigation along this boundary with screen planting, which would create a green hedge along this boundary, with views to the north (across the vineyard) remaining open from the Trail. I consider that this would mitigate the adverse visual effect. Another method of increasing amenity from the views outside of the site relate to ensuring buildings have an appropriate level of detail to provide visual interest.*
58. *The current setbacks within Schedule 17.5A would provide sufficient depth to screen the development from the Great Taste Trail, and would mitigate most views, with only the upper portion of the fringe buildings visible. The exception to this is the elevated view from the residential dwelling neighbouring the property to the south west (82 Main Road Hope). This property has two dormer windows that look down across the site. There would be a moderate to high visual effect experienced from these upper windows which would result in a loss of outlook and amenity (even though current amenity values are in a degraded state). This loss would relate to a main component of the mid-ground view from this vantage point, and would result in a consistent light industrial/commercial character in both the foreground and mid-ground view (where currently the site appears as a relatively open but unkempt yard).*
59. *This would provide certainty for the neighbouring residence (at 82 Main Road Hope) in terms of the actual effects associated with the change in landuse. This method of mitigation would only be required if the neighbouring property is still being used for residential purposes and still had visual access across the site. Should that change, then the necessity of mitigation should be reassessed.*

RECOMMENDATIONS

60. *That any development within proximity (50m or less) to the boundary with 82 Main Road, Hope (Pt Sec 144 Waimea East Dist) is assessed against effects on amenity and privacy values on this property – especially if the property retains its current residential use. These values include outlook, privacy and solar access. In relation to this objective, facades within direct line of site with the second storey gable windows at 82 Main Road Hope are designed (through glazing treatment such as frosting) to prevent a loss of privacy experienced from these views.*
61. *That the buildings facing the Great Taste Trail have sufficient detail in their north facing façades to provide visual interest along this section of the boundary.*

4.7 Capacity of Services

- 4.7.1 The existing sites within Schedule 17.5A are connected to the Council's reticulated wastewater system. However, insufficient capacity to serve development on Lot 1 DP20392 and Lot 1 DP 19736 mean that mitigation measures may be required if a connection to the reticulated network is not available at the time of development.
- 4.7.2 Water, power and telephone are available to the subject site.
- 4.7.3 As the land has been predominantly undeveloped there is no existing stormwater management system on site. Tonkin & Taylor Limited has assessed the current site in terms of flood risks and stormwater discharge. See **Attachment 6**. Flood risks are summarised in Section 4.8 below.
- 4.7.4 In terms of stormwater runoff, Tonkin & Taylor has noted that at the time of the report there was a total impervious area of 420 square metres, making up approximately 4% of the site area. In addition, there is a large gravel hardstanding area with the remainder of the site currently grassed. Any further development may involve an increase in impervious area which could lead to an increase in peak runoff and total runoff volume from the site. This additional runoff would need to be captured by the existing Borck Creek and Reed/Andrews Drains which have been identified as having inadequate capacity.
- 4.7.5 The actual and potential adverse stormwater runoff effects have therefore been assessed by Tonkin & Taylor. The report compiled by Tonkin & Taylor for Plan Change 50 made similar observations and as a result of recommendations from that report condition (b)(vii) Stormwater was included in Schedule 17.5A. It is considered that including Lot 1 DP 20392 and Lot 1 DP 19736 within this condition will manage the risks associated with increased peak runoff from future development. Refer to Amendment 6 and Section 4.8 below.

4.8 Natural Hazards

- 4.8.1 As set out by Tonkin & Taylor in **Attachment 6**, there are stormwater drainage constraints within this Richmond South area that are proposed to be addressed by the

Council as a part of upgrading Borck Creek and Reed/Andrews Drain. Until these works are completed there remain overland flood risks.

- 4.8.2 Plan Change 50 identified that the adverse effects of flooding risks could be avoided if the finished building platform levels of new development were appropriately established.
- 4.8.3 In their report for this Plan Change request Tonkin & Taylor has assessed that the level of flood hazard varies across the site.
- 4.8.4 With existing capacity constraints, it is therefore considered appropriate that this Request ensure any new development on Lot 1 DP 20392 and Lot 1 DP 19736 be designed taking account of flooding risks. Until such time as the necessary capital works have been completed, this will require very careful management of total runoff volumes to avoid adverse effects on downstream watercourses and properties.
- 4.8.5 Proposed Amendment 4 is designed to ensure stormwater drainage and flooding effects of the expanded boundaries of Schedule 17.5A achieve the purpose of the Act.
- 4.8.6 Amendment 7 is proposed to ensure that overland flood flow paths are protected from future development and also .

4.9 Heritage and Cultural Values

4.9.1 The Tasman Resource Management Plan identifies all known cultural heritage and archaeological sites in the District. The planning maps indicate that there are no known archaeological or heritage sites on the subject site. It is therefore highly unlikely that the use or development of the subject land could, in any way, have any adverse effect on cultural heritage values.

4.9.2 Iwi consultation has been undertaken with all 8 Iwi's consulted:

- Ngāti Apa ki te Rā Tō
- Ngāti Kuia
- Rangitāne o Wairau
- Ngāti Koata
- Ngāti Rārua
- Ngāti Tama ki Te Tau Ihu
- Te Ātiawa o Te Waka-a-Māui
- Ngāti Toa Rangatira

4.9.3 The results of consultation and feedback received is contained within Attachment 11, however, no objections to the proposal were raised.

4.10 Ecological Values

4.10.1 The land the subject of this Plan Change Request does not contain any natural values or environments. Given the location and character of this site and future land uses provided for within Schedule 17.5A, no adverse effects on ecological or natural value would arise.

5.0 The Relevant Planning Documents

5.1 Tasman Regional Policy Statement (TRPS)

- 5.2 The resource management issues identified as being “*significant*” within the Tasman District are identified and addressed in the Tasman Regional Policy Statement (TRPS). The identified issues range from avoiding effects from the use of river resources through to the land transport and contaminant discharges.
- 5.3 In order to identify and assesses the proposed Plan Change Request(s) against the TRPS it is appropriate to first consider the resources involved and potentially affected.
- 5.4 The subject land is described in Section 4.2 of this Request. Within this description the land is described as having a lack of rural character with characteristics similar to the developed urban character of sites directly to the north. Hence in the context of the significant resource consent issues identified in the TRPS, it is appropriate consider the site as:
- i) an urban land resource, and not a rural-productive land resource;
 - ii) on the edge of the urban / rural boundary;
 - iii) with the development of this land having the potential to impact on other urban amenity values (i.e. residential) and the land transport system (SH6).
- 5.5 The relevant chapters of the TRPS are discussed and assessed below.

Chapter 5.0 Urban Development

- 5.6 Of the 7 issues identified under this Chapter of the TRPS, the two of particular relevance to this Plan Change Request include:
- Issue 5.6 – Effects of Land Transport Activities and Urban Development on Each Other
 - Issue 5.7 – Maintenance and Enhancement of the Quality of the Urban Environment
- 5.7 Issue 5.6 overlaps directly with Chapter 12.3 of the TRPS addressed from paragraph 5.11 of this assessment.
- 5.8 In terms of Issue 5.7, Objective 5.5 and Policy 5.7 are considered to be relevant to the amenity considerations of relevant to the proposed amendments to Schedule 17.5A:

Objective 5.5

Maintenance and enhancement of urban environmental quality, including amenity values and the character of small towns. (p32, TRPS)

Policy 5.7

Council will seek to enhance urban environmental quality, having regard to:

- (i) the design and appearance of buildings and spaces;*
- (ii) vegetation and open space;*
- (iii) heritage sites and values;*
- (iv) pedestrian facilities and traffic management;*
- (v) noise levels and air quality;*
- (vi) the relationship between the urban area and the values of its adjoining landscapes. (p38, TRPS)*

5.9 “Methods of Implementation” are also listed at the end of Chapter 5 to identify how the above listed objective and policy will be achieved. Aside from the provision of funds and information, the primary method is identified as follows:

- (i) The Council will develop policies and rules in the District Plan and make decisions on resource consent applications to require appropriate standards of environmental performance, amenity and network utility provision, buildings and open spaces in urban development or redevelopment, including financial contributions to be made by developers. (p39, TRPS)*

5.10 This Plan Change Request does not propose to amend the existing planning framework. An amendment is sought to Schedule 17.5A and the relevant amenity considerations can be addressed through some consequential rule amendments. It is considered that this Request maintains consistency with this planning framework.

Chapter 12.3 Transport Issues

5.11 Objective 5.4 and policy 5.6 are located in Chapter 5 of the TRPS under the topic of Urban Development:

Objective 5.4

A safe and efficient urban transport system. (p32, TRPS)

Policy 5.6

Council will avoid, remedy, or mitigate the adverse effects of:

- (i) urban development on the safe and efficient operation of land transport resources, including effects on:

 - (a) their accessibility;*
 - (b) principal road corridors;*
 - (c) alternative modes of transport; and**
- (ii) the provision and operation of the land transport system on:

 - (a) the amenity, convenience, health and safety of people in urban communities;*
 - (b) the health of ecosystems; and*
 - (c) the quality of air, water and soil resources. (p37, TRPS)**

- 5.12 These provisions are relevant to Chapter 5 in recognition of the fact that urban development and expansion may create adverse effects for land transport networks. Chapter 12.3 does however provide a more specific set of transport provisions. Objective 12.4 and Policy 12.5 are therefore relevant to this assessment:

Objective 12.4

Maintenance and enhancement of safe and efficient land, maritime, and air transport systems, while avoiding, remedying or mitigating the adverse effects on human health, public amenity and water, soil, air and ecosystems. (p148, TRPS)

Policy 12.5

The Council will ensure that the land transport system efficiently and safely provides for the movement of goods, services, and people, including a reasonable level of access, while avoiding, remedying or mitigating adverse effects on the environment including communities. (p148, TRPS)

- 5.13 The following *Method of Implementation* are also considered relevant to this assessment:

Methods of Implementation

- (ii) *The Council will develop policies and rules in the District Plan and make decisions on resource consent applications which provide for compatibility between:*
- (a) *the standard of roading;*
 - (b) *the nature of adjoining land use;*
 - (c) *traffic generation (at source and cumulative downstream traffic);*
 - (d) *access to property. (p149, TRPS)*

- 5.14 This Plan Change Request will not fundamentally change this urban form / pattern and proposes to utilise existing vehicle accessways designed and constructed to consolidate the type and intensity of traffic proposed.

SUMMARY

- 5.15 It is considered that this Plan Change Request has been designed to appropriately maintain consistency with the relevant provisions of the Tasman Regional Policy Statement.

5.16 Tasman Resource Management Plan (TRMP)

- 5.17 As no amendments to the current framework, objectives or policies are requested as a part of this Plan Change, this assessment focuses on the extent to which the expanded boundary of Schedule 17.5A achieve the overall intentions of the Plan.

- 5.18 It is considered that the following chapters of the TRMP are of particular relevance to this assessment:

- Chapter 5: Site Amenity Effects

- Chapter 6: Urban Environment Effects
- Chapter 11: Land Transport Effects

Chapter 5: Site Amenity Effects

- 5.19 The introduction to Chapter 5 provides a helpful and concise summary of this issue of “site amenity effects”:

Land use frequently has effects which cross property boundaries. Those effects may add to or detract from the use and enjoyment of neighbouring properties. They may also affect natural resources, such as air and water quality, or common goods such as views or local character.

Adverse cross-boundary effects are commonly noise, dust, vibration, odour, contamination, shading and electrical interference. Amenity values such as privacy, outlook, views, landscape, character and spaciousness may also be affected.

Amenity values may also be affected by increased or decreased stormwater run-off from development. The health and safety of people must be assured, and flooding to property must be avoided, remedied or mitigated.

Within a site, amenity may stem from the versatility of the site: the proportions of buildings, open space, and vegetation; provision for vehicles; the benefits of daylight and sunlight both indoor and outside.

The health and safety of people, communities and property is a significant part of site amenity, both within the site and between sites. Contaminants, including noise, and fire, hazardous substances and natural hazards, are factors in maintaining or enhancing amenity values.

The density of development influences the degree of some effects. In other cases it influences the perception of when an effect becomes adverse; for example development at urban density produces different expectations of privacy than is achieved in rural areas.

In rural areas, ... (Section 5.0, p1, Chapter 5, TRMP)

- 5.20 Chapter 5 then contains a set of objectives, policies and stated methods that collectively set out how activities are to be managed to ensure adverse effects on amenity values can be avoided, remedied or mitigated.
- 5.21 Section 5.1 addresses “Adverse Off-site Effects”, Section 5.2 addresses “Amenity Values”, Section 5.3 is entitled “Visual and Aesthetic Character”, Section 5.4 addresses the issue of “Residential Activities and Community Facilities”, and Section 5.5 addresses “Health and Safety”. The relevant objectives are provided below:

Objective 5.1.2

Avoidance, remedying or mitigation of adverse effects from the use of land on the use and enjoyment of other land and on the qualities of natural and physical resources. (p1, Chapter 5, TRMP, emphasis added)

Objective 5.2.2

Maintenance and enhancement of amenity values on site and within communities throughout the District. (p5, Chapter 5, TRMP, emphasis added)

Objective 5.3.2

Maintenance and enhancement of the special visual and aesthetic character of localities. (p7, Chapter 5, TRMP, emphasis added)

Objective 5.4.2

Accommodation of a wide range of residential activities and accessible community facilities in urban areas. (p9, Chapter 5, TRMP)

Objective 5.5.2

Reduction of risks to public health and safety, property and the environment, arising from fire and hazardous substances. (p10, Chapter 5, TRMP)

5.22 Objectives 5.1.2 and 5.2.2 are supported by a range of generic policies that seek to avoid, remedy and mitigate adverse off site and on site effects from land use, subdivision and development. In both cases, the Plan identifies a range of regulatory and non-regulatory “*Methods of Implementation*”. In terms of off-site effects, one of the regulatory methods includes:

(b) *Zones and areas that are identified on the basis of particular characteristics and qualities where variations in rules to manage actual and potential effects apply.* (5.1.20.1, p3, Chapter 5, TRMP)

5.23 It is considered that Schedule 17.5A is one such example of how regulation has been used to address the particular characteristics, values and circumstances. “Rules” relating to bulk and location, nuisances, noise, and screening are also listed as methods used to achieve the relevant objectives.

5.24 This Plan Change Request proposes to use the current planning framework while improve the current administrative structure surrounding this framework. The specialist landscape assessment has directed that appropriate matters of control are required in order to ensure the amenity of this environment is maintained. These recommendations have been adopted in full.

5.25 While section 5.3 (Visual and Aesthetic Character) focuses on special visual and aesthetic character, policies 5.3.3.6 has some relevance to this Request given the location of the site:

Policy 5.3.3.6

To provide clear and distinctive boundaries to urban areas in relation to the main highway routes. (p8, Chapter 5, TRMP)

5.26 While this policy guidance would be important to the proposed rezoning of rural land to enable urban development, the subject site already has a degraded rural character which the landscape assessment considers to be ‘*neither rural nor industrial*’. The site is predominately screened from view from the State Highway by the existing commercial premises (Caltex fuel stop and container storage yard) to the South. Despite this, consideration has been given to the visual and landscape effects of this Request (refer to Section 4.6 above and **Attachment 5**).

- 5.27 Section 5.4 (Residential Activities and Community Facilities) of Chapter 5 is not considered to be of particular relevance to this proposal. This Request does not impact on the community's ability to accommodate a range of residential and accessible community facilities.
- 5.28 Section 5.5 is directed at the safety of people, property and resources, and in particular the impacts of hazardous substances in this regard. No amendments are proposed to the planning framework surrounding hazardous substances and therefore this Plan Change Request does not affect these Plan intentions.

Chapter 6: Urban Environment Effects

- 5.29 The key locational and urban form issues addressed within Chapter 6 of the Plan are listed in Section 6.0:
- (a) *Urban development that provides a liveable and sustainable environment for the community through the use of careful design.*
 - (b) *Urban growth that minimises the loss of the most productive and versatile land in the District.*
 - (c) *Urban development that avoids locations where it has the potential to be adversely affected by loss or damage from natural hazards.*
 - (d) *The ability to service urban growth (including new residential subdivision) cost effectively and sustainably. Compact urban form can promote efficient use of existing utility services, energy and infrastructure.*
 - (e) *The effect of urban expansion on the character of coastal locations.*
 - (f) *The efficient use and development of the scarce industrial land resource.*
 - (g) *Efficient use of commercial land resources.*
 - (h) *Maintenance and enhancement of environmental character and design features in towns. The relationship between buildings and ridgeline features is an issue in some towns.*
 - (i) *The extent of urban expansion bordering national parks.*
 - (j) *The cumulative effect of more dense development on stormwater quality and flood risk.*
 - (k) *Residential development that provides for a diversity and choice of housing density and form to cater for a growing population, a changing demographic profile and a range of living options.*
 - (l) *The effect of urban development and expansion on historic and cultural heritage. (p4, Chapter 6, TRMP, emphasis added)*
- 5.30 Using the above list as a guide, the following sections of Chapter 6 are considered to be of relevance to this assessment:

- Section 6.5 Land for Industrial Activities
- Section 6.8 Richmond

5.31 Section 6.5 of the Plan acknowledges that there is a limited availability of land for industrial activities where adverse effects can be adequately avoided or mitigated. Objectives 6.5.2.1 and 6.5.2.2 then seek:

Objective 6.5.2.1

Accommodation of a wide range of industrial activities in locations where adverse effects on other values and activities are avoided, remedied or mitigated. (p17, Chapter 6, TRMP)

Objective 6.5.2.2

A supply of suitably located industrial land to provide for the medium to long-term needs of the Tasman and Nelson region. (p17, Chapter 6, TRMP)

5.32 Of the 13 policies provided to achieve these objectives, the following are considered to have some relevance to the assessment of this Plan Change Request:

Policy 6.5.3.1

To promote a form of settlement that identifies area where industry can operate with the required services and without adverse effects on or from other activities. (p17, Chapter 6, TRMP)

Policy 6.5.3.3

To identify areas where light industry can operate with convenient access to the transport system and without adverse effects on or from other activities. (p17, Chapter 6, TRMP)

Policy 6.5.3.5

To avoid a reduction of amenity standards in residential areas by industrial activities. (p17, Chapter 6, TRMP)

Policy 6.5.3.7

To prevent the expansion of industrial zones, or the creation of new industrial zones, in sensitive environments such as aquifer recharge areas and margins of lakes, rivers and wetlands. (p17, Chapter 6, TRMP)

Policy 6.5.3.9

To provide a medium-term supply of suitable industrial land close to urban areas and strategic road networks. (p17, Chapter 6, TRMP)

Policy 6.5.3.11

To enhance the amenity values of new industrial areas for employees, customers and for the public when viewed from public areas such as roads, and open space. (p18, Chapter 6, TRMP)

- 5.33 The above policies provide some useful guidance to this assessment of this Plan Change Request. It is however appropriate to acknowledge that Schedule 17.5A already exists and the land the subject of this Request is already very conveniently located in close proximity to the State Highway 6 (and SH60), and also well positioned in terms of an employment base.
- 5.34 It is considered that the key issues that arise relate to the amenity values of nearby residential properties and the management of the visual effects of an expanded schedule when viewed from State Highway 6 and the railway reserve (Great Taste Trail). These matters have been comprehensively assessed in section 4.6 of this Request.
- 5.35 Moving onto Section 6.8 of the Plan and the issues for “Richmond”, the following provides some context to this section:

The key issues for the future development of Richmond area:

- 6.8.1.1** *The management of peripheral growth in a manner that enables Council to progressively upgrade services on the western, south-eastern and north-eastern margins of Richmond.*
- 6.8.1.2** *Industrial and mixed business land located to minimise adverse effects on neighbours, on the Waimea estuary, watercourses and their margins, and on the productive potential of land.*
- 6.8.1.3** *Enhancement of the setting of Richmond, especially the coastal margin and the hill backdrop.*
- 6.8.1.4** *Upgrading of the amenity of the central business area, main highway routes and town entrances.*
- 6.8.1.5** *Maintaining the Central Business Zone as the central focus for intensive retailing, administration and community interaction, and as the core pedestrian-oriented area.*
- 6.8.1.6** *Meeting the demand for a range and choice of residential housing within the Residential Zone in Richmond. (p26, Chapter 6, TRMP)*

- 5.36 The same resource management issues underlined above are those that have already been noted and assessed in earlier parts of this assessment.

Chapter 11: Land Transport Effects

- 5.37 There are two components or issues addressed within Chapter 11 of the Plan. The first is addressed within Section 11.1 and relates to the effects from the form and location of development **on** transport safety and efficiency. The second, contained within Section 11.2, relates to the effects on the environment from the location, construction and operation **of** the land transport system. Only Section 11.1 is relevant to this assessment. The relevant objective and policies are provided below:

Objective 11.1.2

A safe and efficient transport system, where any adverse effects of the subdivision, use or development of land on the transport system are avoided, remedied or mitigated. (p1, Chapter 11, TRMP)

Policy 11.1.3.1

To promote the location and form of built development, particularly in urban areas, that:

- (a) avoids, remedies or mitigates adverse effects of traffic generation;*
- (b) provides direct and short travel routes by vehicle, cycling and pedestrian modes between living, working, service, and recreation al areas;*
- (c) avoids an increase in traffic safety risk;*
- (d) allows opportunities for viable passenger transport services to be realised;*
- (e) provides a clear and distinctive transition between the urban and rural environments;*
- (f) segregates roads and land uses sensitive to effects of traffic. (p2, Chapter 11, TRMP)*

Policy 11.1.3.2

To ensure that land uses generating significant traffic volume:

- (a) are located so that traffic has access to classes of roads that are able to receive the increase in traffic volume without reducing safety or efficiency;*
- (b) are designed so that traffic access and egress points avoid or mitigate adverse effects on the safety and efficiency of the road network. (p2, Chapter 11, TRMP)*

Policy 11.1.3.6

To control the design, number, location and use of vehicle accesses to roads; including their proximity to intersections and any need for reversing to or from roads; so that the safety and efficiency of the road network is not adversely affected. (p2, Chapter 11, TRMP)

- 5.38 The direction provided in the above objectives and policies is summarised in Section 11.1.30 (p4, Chapter 11, TRMP):

The location and form of build development and other traffic-generating activities is a strong determinant of the form of the transport system, a major physical resource of the District. Compact urban form, with a minimum of ribbon development, enables development of an efficient network for through traffic. There is a legacy of ribbon development in parts of the District, such as at Hope, Wakefield and Ruby Bay. Any more intensive development in such areas will need to avoid adversely affecting traffic safety and efficiency. (p4, Chapter 11, TRMP)

- 5.39 The actual and potential traffic effects of the requested amendments are assessed (**Attachment 4**) as being minor. Particularly as a result of the requested amendments for the purpose of managing traffic effects. This Request is therefore considered to achieve the relevant objectives and policies within Chapter 11 of the Plan.

SUMMARY

- 5.40 It is considered that this Plan Change Request has been designed to appropriately maintain consistency with the relevant provisions of the Tasman Resource Management Plan.

6.0 Consultation

- 6.1 In recognition of the function of the New Zealand Transport Agency and the potential effects of activities on the safe and efficient operation of State Highway 6, the applicant has consulted with NZTA while preparing this Request.
- 6.2 This consultation has resulted in a number of amendments to the original application and additional matters of control are proposed to mitigate any potential adverse effects on the safe and efficient use of the State Highway particularly in relation to the use of Crossing Place CP68B are proposed.
- 6.3 The applicant also consulted with the following landowners in relation to the proposal
- The owners and occupiers of 82 Main Road Hope – Gary & Alison Manson
 - The owners of 70 Main Road Hope – Gareth and Tamara Gabb
 - The owners of 66 Main Road Hope – Lester Shayne Gregg
 - The occupiers of 66 Main Road Hope – Nelson Automotive Solutions (John Everett)
- 6.4 No feedback or comments were received from any of the above parties.
- 6.5 The applicant consulted with all 8 Iwi providing a copy of the application and a summary document for each Iwi to review. Iwi were consulted with via an email sent on 14th June 2019, a follow up email was sent on 28th June.
- 6.6 Feedback was received from 3 Iwi, with details of the feedback received contained within Attachment 11.

7.0 Evaluation of matters under Clause 25(4) of the First Schedule

- 7.1 Section 25(4) of the First Schedule states:
- The Local Authority may reject the request in whole or in part, but only on the following grounds that –*
- (a) *The request or part of the request is frivolous or vexatious; or*
 - (b) *Within the last 2 years, the substance of the request or part of the request –*
 - i. *has been considered and given effect to or rejected by the Local Authority, or Environment Court; or*
 - ii. *Has been given effect to by regulations made under section 360A; or*
 - (c) *The request or part of the request is not in accordance with sound resource management practice; or*
 - (d) *The request or part of the request would make the Policy Statement or Plan inconsistent with Part 5; or*
 - (e) *In the case of a proposed change to a Policy Statement or Plan, the Policy Statement or Plan has been operative for less than 2 years.*
- 7.2 It is considered that there are no grounds available for this request to be rejected.

8.0 Conclusion

- 8.1 This Request seeks to expand Schedule 17.5A into adjoining land with the same character. The traffic, residential amenity and landscape effects of this Request have been carefully considered and addressed within the integrated package of amendments proposed.
- 8.2 It is considered that this package of Plan amendments achieves the “sustainable management” of this land resource in close proximity to Richmond.