



## Long Term Plan Submission – April 2021

MDCA once again wish to thank TDC for this opportunity.

MDCA are resubmitting the contents of our 2020 LTP submission into the 2021 LTP submission process as the points that were valid and pertinent to our community are still extremely current and valid in 2021.

MDCA have also attached comments from some members who wish their voice to be heard. These items are listed in no particular order below.

### **1) The logic of the plan is back-to-front.**

Tim King said that the overall aim of the Council is to make sure that we make Tasman a better place for future generations to live in. In the plan, however, the starting point is the residential development - and this is spelled out with detailed numbers of people and houses that will be catered for. The vast spending on the dam, and the commitment to keep going on that whatever the cost, is part of this development drive. Everything else - the environmental and social stuff especially - gets fitted around it, and shares whatever money is left. Significantly, there are NO quantitative targets for environmental for social issues: the percentage reduction in greenhouse gas emissions, for example, or the impacts on vehicle kilometres travelled. All we get, instead, is empty phrases. This needs to be changed. We should start with our social and environmental goals clearly spelled out, and development should be fitted into those. That means we need a clear and concrete vision of what those environmental and social goals are.

### **2) The climate change actions are weak in the extreme.**

The list of actions and spending under the banner of climate change are vapid at best, and in many ways downright misleading. Waste management, for example, has very little to do with climate change - and in any case is not being paid for by the Council. Continuation of commercial forestry on TDC land is in no way a means of mitigating climate change; if that were the aim, we'd be converting the land to semi-natural or natural forest as the forests were harvested. It is purely for the purpose of making money. Investigating a more agile response to biosecurity (whatever that might mean) is a vague irrelevance. New tree planting is of course good - but is likely to be negated by the continued removal of trees by development and other land use change; nothing is said about conserving existing tree cover. Insulating 500 homes (option B) when the planned development will create 4300 additional homes - with all their associated emissions - is essential for social reasons, but almost meaningless in terms of climate change effects (There's evidence to suggest that, while insulation improves the indoor living environment, it doesn't greatly reduce energy use or emissions.)

### **3) There MUST be clear quantitative targets for all policy areas**

One of the principles of good policy is that it is defined in terms of clear and quantitative outcomes. Without those, the Council has no means of knowing whether or not it's actually achieved its goals - and cannot be held to account for its actions. Nor does it know whether individual actions make the situation better or worse. Likewise without clear measures of outcome, the public consultation is meaningless, because no-one really knows what they are voting for.

#### **4) Residential Developments**

Without much more information about the residential developments, it is impossible to make any serious assessment of the options. For example, if the proposed area for development in Lower Moutere in option B is merely another developer-led sprawl of residential housing, then it has many drawbacks: it's a long way from any shops or services so will involve lots of car travel, and it's unlikely to result in high density development. But if it is designed as a new community - with shops, services, recreational/green space - then it would clearly have substantial benefits. The TDC need to be much more proactive, therefore, in defining what sort of development occurs, and ensure this by a) providing a proper design for the new developments and b) by making developments conformable with this design through the resource consent process.

#### **5) Boat Ramp**

The MBC will be making a submission re the funding in the LTP for a boat ramp, which has now been reduced from 1.1M\$ (as it was in the current LTP) to \$600K – with construction put back from 2021/22 to 2026. One would have thought construction costs will increase in the intervening years!

The MBC would appreciate the MDCA including support for a replacement boat ramp in the Mapua (which has previously been mandated by the MDCA membership) and I have attached a copy of a generic submission we will be asking boat club members to sign and submit in addition to the MBC submission for your reference.

#### **6) Community Boat Ramp**

I would be keen to see MDCA ask council to keep funds for a new community boat ramp in the LTP.

#### **7) General**

Thanks for the opportunity to submit on the draft-LTP. Although we appreciate that TDC is seeking feedback on the four big choices we do have problems with this approach. After asking it appears that the full LTP-report is not yet available – still be worked on. As a community association we would like to search the LTP for all matters related to Māpua and its community and see how we can contribute to strengthening the LTP to ensure the outcomes meet community expectations.

Also, the options presented are presented as additional costs. We challenge this approach as there must also be trade-offs, lower priority activities that we would like to see reduced. We are well aware that the LTP process is very complex but feel that a lot of information is not provided and hence a comprehensive feedback is not possible. We also question the legality of this approach.

#### **8) 2020 Submission by the Mapua and Districts Community Association (MDCA)**

In June 2020 the MDCA made a submission as input into the LTP process as requested by TDC. We struggle to find if and how most of the issues raised have been addressed (or not) in the LTP. This is disappointing. Consequently, we repeat our requests from the the June 2020 submission as part of this submission (attachment 1) See Appendix A

#### **9) Growth in Mapua**

We had a look at the “What is proposed for the Māpua/Ruby Bay” [overview](#). TDC appears to go by ‘growth projections’ without accepting the ability to influence the outcomes and a local scale. The overview makes comments such as “The actual number and location of new houses and commercial/industrial buildings is largely determined by the private sector...”. It appears that the aspirations of the Māpua community don't play a part in this. The map provided is at a very large scale and doesn't show where in that area the growth is projected. It provides no basis for a meaningful dialog about how much, where and when additional development is required. Current zoning is based on knowledge and planning insights that are old and do not meet the community aspirations of today. Insights related to climate change, the need for connectivity and most important of all the need to provide for affordable housing for our Mapua community are reasons to change what has been planned. We are well aware that TDC is working on a review of the TRMP and that central government will replace the RMA with other bits of legislation. This will be a long process and we feel that Māpua cannot wait for these lengthy processes to be completed.

TDC has the ability to re-zone or review the zoning of areas such as the ‘deferred residential areas’. The way these are currently zoned do not meet the needs of the Māpua community. The market, that TDC is fully relying on provides for large lots and large expensive houses in new greenfield subdivisions.

The Future Development Strategy is already outdated. The areas for future growth shown in this Strategy do not meet the test of current requirements such as connectivity, climate change and will encourage more larger houses, more car use far away from the village centre. Nothing to address the housing needs for the local community: no allowance for closer to town smaller and affordable housing. Infill plan changes undertaken elsewhere in the region where not initiated in Māpua. , We note that although these areas are tagged in the Development Strategy, these have not gone through a plan change process and thus any investment in unlocking these areas is premature and not justified.

As pointed out in the overview, the population and Tasman and Māpua will age. As people in Māpua get older and those that want to downscale, they have no local alternative, they will have to leave their friends and family in Māpua and find smaller housing elsewhere.

We are aware of examples where people wanted to build smaller and more affordable housing and have been basically frustrated by consent/planning staff because what they wanted to offer to the community was not permitted under the current zoning rules.

We understand that the LTP is not a planning document but the LTP can set priorities and provide funding for activities that will address the housing needs for the Māpua community.

We request that:

1. priority and funding be allocated to review the zoning in and around Māpua to allow for more, smaller and affordable housing.
2. Any investments proposed in the LTP to accommodate undesirable and unsustainable development on the outskirts of Māpua/Ruby Bay be removed, largely related to infrastructure connecting the 'Seaton Valley Hills area.
3. Provide for a fund for 'strategic purchases' and 'development initiatives' to enable and initiate smaller and affordable housing including social housing in Māpua. It is very unlikely that the market as referred to in the overview, will provide for this demand. We note that although initial funds would be required this would not necessarily cost TDC on the long run. A partnership with the private industry will be needed. As a first step, a business model would need to be set up to achieve this.
4. In relation to the 'big choices' provided in the LTP communication plan, we (1) believe that these options do not provide the detail for the Māpua community to provide a specific response, (2) that based on the reasoning provided above, developments such as 'Upper Moutere Hills' are not sustainable and should be rejected. Based in that we recommend option A.

## **10) Climate Change**

We agree with TDC that contributing to climate change mitigation and adaptation is very important. There are many climate-change actions that we feel TDC could also take that are not mentioned. The options do not provide the full suite of potential activities and do not provide adequate information on what is currently programmed. It is not clear how the three key themes as referred to in the climate action plan are programmed and funded (mitigation, adaptation, leadership).

The information on the webpage part "[big choices / climate change](#)" makes the observation that "As part of developing our Tasman Environment Plan (TEP) under the Resource Management Act, we're working on a project to involve our Tasman Bay/Te Tai o Aorere and Golden Bay/Mohua communities in planning for how we can best respond to sea level rise and coastal hazards." The plan for adaption refers to the TEP as the only instrument. Surely that is not the case?

It is great that TDC works with the communities to determine how best to respond to the effects of climate change. The development, implementation and funding of climate adaption plans is critically important. It is not clear in the LTP documents provided all activities related to climate change mitigation and adaptation are identified, prioritised and funded. The list of actions listed under options A and B is very limited. It is also not clear how TDC will take leadership on this topic as promised in the climate action plan. One example of leadership TDC could take is the inclusion of climate mitigation related requirements in the TDC procurement processes.

We request that:

1. Actions related to the development of adaptation plans are specifically included and funded.

2. Action related to climate change mitigation actions are specifically included and funded.
3. Action related to TDC providing leadership in climate change actions are specifically included and funded.
4. That the LTP provides adequate funds to give effect to the 'climate change adaptation plans' and if not yet identified provides for a placeholder to enable for such action when confirmed
5. Of the options provided we suggest to accept option B but note that there is much more TDC should do.

### **11) Waimea Community Dam - allocation of irrigators costs**

It is very frustrating to hear that the costs keep increasing despite the fact that we were promised hand-on-hard by the previous mayor and staff in a community meeting only a few years ago that any risks were costed and that it was very unlikely that the cost would escalate beyond the estimate at the time.

We strongly feel that the community pays a very high costs related to the ever-increasing costs of the dam. We cannot see a justification to pay for the 'irrigator' allocated costs.

For this reason, we recommend option D

### **12) Current performance, levels of service and following actions**

On request, we were send a [link](#) to the 'draft council Activitie)s summary 2021-2031 document. It was very hard to find this information which confirms our concern related to the transparency of the process as discussed under general.

We are concerned that the levels of service and the activities listed largely relate to undertaking very general activities such as monitoring and reporting but very few relate to the improvement of actual outcomes.

As an example, the [Richmond CMP](#) shows that streams at many locations In Richmond have a poor or very poor quality (stream habitat score). The LTP, nor this activities document shows what TDC intends to do to address this. It also appears that no catchment plans are available for other townships. So, for Māpua we have no idea if targets are met and what actions TDC will undertake to address water quality issues.

Another example is that there is no target for the number of wastewater overflows allowed. This is directly related to the need to justify capital works in the wastewater network. Without a quantifiable target, we question how expenses are justified. It is well possible that TDC provides for an over-designed, gold plated network or the opposite.

It is beyond our capability to review all the items in this document, the discussion above is using a few examples to demonstrate our concerns.

We request that the activity plans be reviewed to:

1. to include measurable/meaningful outcomes as Levels of service and the current state of performance
2. to include activities to improve the outcomes where the current state is not meeting the levels of service

In scanning the document, we are pleased to see that there is an allowance for a contribution to the upgrade of the Māpua Hall in 2003/04.

In the section 'contribution to community outcomes' the Māpua Wharf is mentioned but it is unclear what TDC is intending to do to provide for (improved) community outcomes and address potential negative effects.

We have also noted an annual renewal budget for the Māpua Wharf of \$580,000 and request how this budget will be spent and that the community association is actively involved in scoping any work. Renewal work often provides for an opportunity to improve the overall outcome rather than suing a like-for-like renewal process. This last request is obviously not just limited to the Wharf area but all works in the Māpua/Ruby Bay area.

We request to more specifically identify how this budget will be spend and how the MDCA will be involved.

We assume that the (delayed) allowance for the 'boat access improvements' of \$900,000 (page 45) is related to the provision of a boat ramp for our community following the outcomes of the study currently underway. From the table on page 47 we guess that this expenditure is programmed for 2028/29 but the wording is not clear. After many years of discussion we find the time disappointingly late.

We request:

1. that the commitment for a boat ramp to providing a satisfying outcome for our community is more clearly tagged and to bring forward the year this is project is programmed. Assumig the study is completed this year

and consultation and decision take another half a year the implementation could start in the 2022/23 financial year

## APPENDIX A:



### Long Term Plan Submission – June 2020

Māpua & Districts Community Association (MDCA) thanks TDC for this opportunity to make a submission.

The contents of this submission have been widely consulted with our financial members as well as those members who have not as yet renewed their annual subscription for the current year.

Covid 19 has resulted in some difficult financial times for all. MDCA are aware of how this will impact TDC's income moving ahead. We have approached this submission with this in mind, however, we are also mindful (rather hopeful) should this financial situation change for the positive in the coming years, items we would like to see prioritised have also been included.

MDCA believe now is the time for TDC to review its costs, staffing levels, and staff effectiveness, efficiencies and accountability in keeping with the 'Customer Commitment' detailed on page 5 of the '2020 Vision for Tasman', while examining how TDC services and systems can be improved and streamlined to ensure service delivery becomes more cost effective in both environmental outcomes, and time and dollars spent. ie. Adhering to all regulatory processes (both local and national); transport modes and links; future developments; environmental impacts etc, etc, etc.

MDCA would like to encourage TDC to adopt new policies that incorporate all the lessons learned as a result of Covid 19 and ensure the Tasman District are as prepared financially and proactively as much as possible from future unforeseen crisis. TDC also need to consider what role it can play to encourage and educate individual households to be more prepared, self sufficient and self-reliant in time of natural or health disasters.

#### General:

- Slow down development so as Māpua maintains a 'Village' feel. This will require well thought out and planned areas of future growth.
- MDCA recommend TDC support and work collaboratively with communities to enable communities to become engaged and directly involved in any community based projects whether it be enabling a community where and how to apply to raise funds, project advice and assistance. Shifting TDC's focus slightly from fully providing to enabling and assisting.
- Beautify the entry to Māpua Village. Ensure plantings that have already occurred are maintained in a good condition – this has not been the case with some areas along Aranui Road.
- MDCA support and expect responsible, efficient and effective fiscal management so as to ensure rates are at an affordable level while ensuring basic infrastructure is well maintained. MDCA would like to see TDC adopt

the cost cutting measures learnt through the Covid 19 level four lockdown by utilising 'zoom meetings' more frequently to save on staff travel time and vehicle usage/expenses/environmental impacts.

#### **Parks, Reserves & Recreation:**

- Continue to support the planned redevelopment at the Ngaio Tree Reserve at Port Māpua currently being undertaken in co-ordination with the Māpua Waterfront Area Masterplan Working Group.
- Support a proposal from the Māpua Waterfront Area Masterplan Working Group to undertake a staged redevelopment of Grossi Point and the groups' ability to fulfil the functions set out within the Mapua Area Masterplan.
- To look seriously into resolving the outstanding boat ramp issue created by TDC when business & tourist development expansion was undertaken at Port Māpua.
- Maximise all green space in and around Māpua, Tasman and Mahana.
- Seriously consider allowing and supporting space within Māpua Village to establish a Community Garden. Suggested areas could include either Aranui Park, Moreland Place Esplanade Reserve, or Mapua Recreational Reserve between the Scout Den and the Māpua Bowling Club.
- Consider a variety of predominate uses of each recreational space so as to create diversity and interest from one space to another.

#### **Port Māpua (Māpua Wharf):**

- Continue with and complete the Ngaio Tree Reserve development
- Make the Ngaio Tree Reserve an 'alcohol free' zone for the public, not businesses and their patrons.
- Don't allow the commercial activities to over-ride the historical, cultural, community, educational, and recreational activities within the area.
- Do not allow any further commercial or residential development to occur within the Mapua Wharf area or within the open spaces of the Waterfront Park or the open area opposite from the Waterfront Park. Leave these areas as open space for community recreational purposes.
- Find and enable an alternative boat ramp solution for Māpua

#### **Roads, Footpaths & Cycleways:**

- Ensure the current footpath and roading priority list stays current without change or delay.
- Māpua Village shopping centre needs two safe pedestrian crossings – one in front of Māpua Health with the other near the Māpua Reserve Playground.
- Ensure the development of a walk and cycle way along Seaton Valley Stream from Moreland Place to Māpua School has a high priority ranking.
- Continue to add and link off road walk and cycle ways as land becomes available.
- Support the Nelson Tasman Transport Trust and the Māpua Community transport initiatives.
- Covid 19 highlighted our footpaths and cycle ways are too narrow. These need to be progressively widened to 2.5mtrs.
- Appeal to NZTA to resolve the traffic congestion at the Wakatu Drive round-a-bouts and the two sets of traffic lights near McGlashen St, Queen St & Gladstone Road.

#### **Solid Waste, Refuse & Recycling:**

- Increase charges on general refuse to off-set recycling charges as an incentive and to send a clear message to both residents and businesses to reduce single use packaging and plastics.

### **Growth, Sustainability and the Environment:**

- Māpua must remain a village that provides its residents with a healthy lifestyle of linking walk and cycle ways and open space as a priority through thoughtful and respectful planning and development that includes designs to reduced green house gas emissions, encourage carbon reduction, and improved carbon sequestration that is scientifically backed, rather than reactive planning that creates over-crowding, congestion, negative environmental impact, and the loss of valued amenities as Māpua has already experienced.
- Consultation with the community must be valued and heard. Residents know more about how a community functions than the TDC staff who are often left to make the decisions on behalf of a community. TDC need to adopt a collaborative community approach to decision making before changes occur. A community that is a pleasant place for its residents to live in will naturally flow onto becoming a pleasant place for others to visit. Residents must be the number one priority with all aspects of future development.
- Encourage the current Waimea Moutere Parks and Reserves review to vest all lands currently identified as reserves in community ownership and ensure parks and reserve spaces are made available and usable for the general public.
- Continue to support restoration and planting via practical support, funding or funding advice. Continue and expand support for volunteer groups. Encourage and guide communities how to help themselves.
- Educate the community and visitors on the Ecological, Environmental, and Historical values of communities and their surrounding areas by providing tastefully designed information boards. Could be a community/TDC joint venture.
- Covid 19 has inadvertently given the earth a huge breather and shown the world the huge impact us humans have on the planet. How can we capitalise on this learning and ensure we do not fall into our old habits once NZ starts getting back to work fully? TDC need to look hard into how to make it easier for residents to cycle and walk in and around their communities safely. TDC can take on an educate role and show residents how to reduce their carbon footprint and actively encourage and create incentives for its residents and its staff to adopt new ways of being. The best way to illustrate this is for TDC to lead by example.

### **Regulatory (planning, building, and resource management):**

- Do not allow multi storey buildings anywhere in and around Māpua. Keep the maximum building height to no more than two stories above ground level.
- Encourage, support and fund more family friendly open spaces with links to other areas within the community.
- Simplify and streamline all regulatory and consent processes.
- Use a common sense approach to specific planning situations. Sometimes following the rule book makes no logical sense in certain situations. These digressions must be made via a consensus of several rather than by an individual staff member and the logic behind the decision being well documented
- Encourage community input into all decision making process. It was as shame and disappointing that Covid 19 interrupted the new initiative to undertake workshops with the community representatives prior to publishing the Draft LTP. MDCA would strongly recommend this type of community engagement moving into the future.

### **Stormwater/Wastewater in the Wider Ruby Bay Area:**

MDCA acknowledges and thanks TDC for the work currently being undertaken to upgrade the fresh water reticulation and wastewater systems. MDCA hope the decision to upgrade the current wastewater pumping station on Stafford Drive will be fit for purpose due to lack of funds creating the inability to complete the project with the installation of a new, larger capacity pumping station on land purchased across the road.



MDCA are also appreciative of the new drain to help drain the storm water from the properties of 74 – 94 Stafford Drive. However, this drain was not completed due to a lack of funding – it still requires an outlet to the sea.

MDCA were promised that RDC would put together a integrated plan (with community consultation) during 2018 – 2020. This hasn't happened to date, so MDCA request funding be set aside for this. Without a plan it is very difficult to make comments. This needs to be addressed urgently – at least in the first half of the long term plan. MDCA would hope the plan would cover the following potential issues:-

- Completion of the final phase of the Seaton Valley Stream widening
- Completion of separable portion 3 of the Ruby Bay Storm water improvements project (2012) as detailed in the LTP.
- A catchment wide 'roof and road to sea' solution for the Stafford Drive to Broadsea Ave outfall to provide a resolution of flooding, seawater inundation and long-term resilience
- The completion of separable Portion 2 of the Ruby Bay Storm water improvement project from 2012.
- Connection of the two new culverts on Pomona Road redirecting their flow into separable portion 2 (when constructed) rather than onto private property.
- Upgrading the inadequate drainage system from Pinehill Road to the sea as this incomplete system has led to serious issues for residents on the seaward side.
- That the stones and sand blocking the overland flow path to the concrete ramp in Chaytor Reserve be correctly re-contoured.

#### **Coastal Protection:**

- There is ample evidence that Old Mill Walkway Coastal Protection Works performed substantially better than the Broadsea Ave Seawall. MDCA requests that TDC identify why they perform differently and correct the deficiencies.
- Regardless of how seawalls are funded, they need to be to similar standards, design, overland flow paths identified and exit strategies for seawater overtopping planned. If not, then the weaker walls will be breached and water will enter properties with more efficient seawalls from behind.

#### **Climate Change:**

- In response to submissions in the previous (2018) LTP, Mr Bush-King noted that current climate change projects are focused on adaption, not mitigation and there is no budget available to shift this current focus. MDCA ask TDC to make a budget available for mitigation (reduction of greenhouse gases GHG) otherwise there is no way emissions will be decrease as required by NZ's commitment to the Paris Accord 2015.
- MDCA believe there needs to be a concerted effort in dealing with climate change over the full 10 years of the LTP if the region wishes to comply with the targets of the Zero Carbon Act 2019. As such we would like to see a clause on the reduction of GHG emissions in all key council processes (such as procurement) with a document template that includes GHG reduction as a key objective.

Thank you for this opportunity to comment on the LTP process.

Please feel welcome to come back to the Māpua and Districts Community Association Executive with any questions you wish to ask.

Kind Regard